

A585 Windy Harbour to Skippool Improvement Scheme

TR010035

7.18 Comments on Written Representations

APFP Regulation 5(2)(q)

Planning Act 2008

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

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

COMMENTS ON WRITTEN REPRESENTATIONS

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ABBREVIATIONS

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

Abbreviation	Meaning
ALC	Agricultural Land Classification
BMV	Best and Most Versatile (in relation to agricultural land)
C4 Estimate	A detailed estimate of the cost of utilities apparatus diversions
Outline CEMP	Outline Construction Environmental Management Plan
DCO	Development Consent Order application
dDCO	Draft Development Consent Order
DML	Deemed Marine Licence
ES	Environmental Statement
FRA	Flood Risk Assessment
HGV	Heavy goods vehicle
HRA	Habitats Regulations Assessment
LPA	Local Planning Authority (either Fylde Borough Council or Wyre Council)
MCAA	Marine and Coastal Access Act 2009
pMCZ	(Proposed) Marine Conservation Zone
MMO	Marine Management Organisation
MOVA	Microprocessor Optimised Vehicle Actuation
NPPF	National Planning Policy Framework
REAC	Record of Environmental Actions and Commitments
RIS1	Highways England's Road Investment Strategy - Tranche 1
RR	Relevant Representation
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TA90/05	TA 90/05 "The Geometric Design of Pedestrian, Cycle and Equestrian Routes"
TA91/05	TA 91/05 "Provision for Non-Motorised Users"
UKCP18	UK Climate Projections 2018

1 COMMENTS ON WRITTEN REPRESENTATIONS

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

Table 1-1: Applicant's Responses to the Written Representations (WR)

Reference Number	Comment from Written Representation	Response to Written Representation
REP2-056	John Bailie	
REP2-056.1	<p>I am writing to express my concern with regard to the unavailability of some specific information...</p> <p>A fundamental element of this scheme is the three new traffic signal controlled junctions at Skippool, Skippool Bridge and Poulton Junction.</p> <p>To improve my detailed understanding of the scheme, and to enable me to express my considered opinion in order to comply with the deadline of 17 May, I wished to examine drawings showing the location of all the traffic signal posts. Having contacted Highways England I was informed that the General Arrangement Plans (TR010035/APP/2.5) would only be completed for the Planning Inspectorate's deadline of 17 May which would clearly make it impossible for myself to analyse that information in time for the deadline. However, I was informed that a document ref: TR010035/APP/7.12 (Combined Modelling and Appraisal Report, Appendix F) which indicates these locations as used to determine traffic modelling, would be available on line and would provide a reasonable guide. The link to that document is however broken. I was then directed to Wyre Civic Centre where it would be possible to view hard copies. Having visited Wyre Civic Centre it transpires that this is not the case. It is unfortunate and unacceptable for a scheme of this scale not to have available to the public information relating to such a fundamental element. Can I respectfully request that this matter is investigated as a matter of urgency, with a view to implementing an extension to the 17 May deadline.</p>	The Applicant understands that these documents have now been made available to Mr Bailie.
REP2-056.2	As a concerned local resident, I wish to draw the attention of the Planning Inspectorate to the following observations and concerns, which consolidate and complement those submitted by myself on 9 April 2019, in the light of obtaining further information. These views are shared by a number of local residents.	The Applicant notes and has had regard to the comments made.
REP2-056.3	<p>Introduction</p> <p>It is recognised that congestion occurs on the A585 Garstang Road at Little Singleton traffic lights, along Mains Lane and at the junction with Shard Road (A588). This congestion is generated mainly at peak times.</p>	
REP2-056.4	At first glance, a road which by-passes these areas would appear to be the solution. However, through detailed analysis and looking at the broader picture of the effects of that analysis, I would urge the Planning Inspectorate to consider the following in the preparation of their submission to the Secretary of State for Transport:	
REP2-056.5	<p>Overview</p> <p>i) The distance from M55 junction 3 to Fleetwood is 19km (11.87 miles). The proposed dual carriageway is 4.85km (3 miles) in length, around only 25% of the total route.</p>	
REP2-056.6	ii) This proposed dual carriageway is fundamentally compromised by the fact that at each end it connects with existing relatively narrow 2-lane roads, each with a length of approx. 4 miles. These are the sections of the A585 from Fleetwood to Skippool	Please refer to response LIR-001, 6.6 in Comments on Local Impact Reports (document reference TR010035/APP/7.19).

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	Junction and from Windy Harbour via Esprick and Greenhalgh to M55 junction 3 (Fig 1). These sections will remain unmodified.	
REP2-056.7	iii) Two existing traffic signal-controlled junctions (at Little Singleton and Shard Road / Mains Lane junction) will be by-passed. However, these will be replaced by three new and more complex junctions, each with many more traffic signals, which will be introduced within the length of the new road. This will result in a "stop-start" experience for motorists that is likely to generate more frustration, congestion and pollution than the scheme aims to alleviate.	There are currently 2 signalised junctions and a roundabout within the Scheme limits. The proposal is to change the roundabout to a signalised junction. The Scheme will introduce 2 additional junctions, Skippool Bridge junction and Poulton junction, both of which will be signalised. By having the junctions all signalised, the Scheme introduces standardisation of junctions and continuity to the road user, the effect of which would be to facilitate the free-flowing of traffic and prevent slowing. All the junctions will be operated using a Microprocessor Optimised Vehicle Actuation (MOVA) system, including the existing Windy Harbour junction. This will enable further control of traffic flow and reduce bottle necks.
REP2-056.8	iv) The section of the A585 stretching eastwards from Little Singleton to Windy Harbour will no longer exist if this scheme goes ahead. This will necessitate a circuitous zig zag route for residents of the Little Singleton and Over Wyre areas wishing to access the new road.	The stretch between Little Singleton to Windy Harbour (Garstang New Road) will become restricted access and a no through road. However, this will benefit the stretch along Mains Lane and alleviate traffic while providing journey time savings for vehicles using the proposed bypass.
REP2-056.9	Skippool Junction and Skippool Bridge Junction The complex Skippool Junction will replace the existing roundabout (Fig 2) at one of the principle gateways to the town of Poulton-le-Fylde. This new traffic signal controlled junction is intended to improve traffic flow and reduce congestion. However, delays and congestion will in fact increase as there are several points of conflict that will interrupt the flow of traffic.	At Skippool junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays.
REP2-056.10	Located alongside the eastbound carriageway, between the two junctions (themselves less than a quarter of a mile apart) a recreational field is utilised several times a year for gymkhanas and other events. United Utilities also have a facility at this point and a new office block development (Fig 3) has recently been constructed close by, which will attract a number of personnel and their vehicles who will need to access these premises on a daily basis. Therefore, traffic travelling in a westward direction (towards Fleetwood) that requires to access these facilities will have to make a U-turn at the Skippool Junction. Provision has been made for this but in order to provide adequate sweep for turning commercial vehicles, HGVs (including articulated vehicles up to 16.5 metres in length) etc as well as private vehicles, this traffic will be required to turn across the signal controlled approaching traffic and turn back on itself around traffic islands (Fig 4) thereby interrupting traffic flow approaching from Thornton (B5412); an extremely awkward and potentially dangerous manoeuvre. This and other factors will inevitably create more delays and congestion currently exists and will interrupt the phasing of the signals. (Currently traffic wishing to access these areas merely has to go around the existing roundabout, a smooth traffic flow).	It is correct vehicles travelling westbound will have to make a u-turn at Skippool Junction however this will not create extra delays to traffic as the phasing of the lights will accommodate this. The Applicant does not agree such a manoeuvre is dangerous and is replicated on other areas of the Strategic Network in the country with no detriment to either safety or congestion. The layout of the junction has been designed to ensure that all traffic (including the 16.5m articulated HGV and 12m long rigid HGV) can carry out the turn effectively.
REP2-056.11	Similarly, traffic exiting these locations can only do so in an eastward direction and if wishing to return westwards towards Fleetwood will have to negotiate a similarly complex and potentially hazardous U-turn across several traffic lanes at the Skippool Bridge Junction.	It is correct vehicles travelling eastbound will have to make a u-turn at Skippool Bridge Junction to return westwards. However, this will not create extra delays to traffic as the phasing of the lights will accommodate this. This solution has been assessed as part of the preparation of the application.
REP2-056.12	The existing slip road to the River Wyre Hotel, which allows access to traffic in a	The existing slip road / service road (Old Breck Road) to the River Wyre Hotel is currently used

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	<p>westward direction, will be closed off (Fig 5). If the scheme goes ahead all traffic both entering and exiting this establishment will have to do so from a point very close to the traffic signals on Breck Road. Highways England have described traffic flow from the River Wyre Hotel as “occasional”. However, this is an extremely busy hostelry with a number of vehicle movements in and out that could hardly be described as occasional.</p> <p>Access to and from the re-routed Old Mains Lane and its residents will require traffic (without traffic signals) to negotiate a hazardous “touch-and-go” manoeuvre across several lanes of traffic very close to the complex signal-controlled multi-lane Skippool Bridge Junction; another potentially hazardous manoeuvre.</p>	<p>as a rat-run, this was confirmed by the public during the statutory consultation, refer to the Consultation Report (document reference TR010035/APP/5.1). The Scheme addresses these concerns by altering this road into a cul-de-sac and closing it to traffic at its eastern end. The Scheme includes provision for traffic lights at Breck Road as part of the Skippool Junction to enable vehicles to access and exit the road safely.</p> <p>The design of the junction of the diverted Old Mains Lane with Mains Lane east of Skippool Bridge Junction would not be signal controlled Traffic turning right out of or turning right into Old Mains Lane would be able to use the gaps in eastbound flows along Mains Lane created by the phasing of the Skippool Bridge Junction traffic signals.</p>
<p>REP2-056.13</p>	<p>Poulton Junction</p> <p>Having negotiated the two complex junctions described above, motorists will embark on the new dual carriageway, each carriageway having two lanes.</p> <p>The road will be built on a raised embankment to enable it to cross the flood plain and then cross the existing Garstang Road East (A586) at Poulton Junction. This involves yet another complex, traffic signal-controlled junction that will once more interrupt and potentially delay journeys.</p> <p>The new dual carriageway then sweeps across open fields, through a new bridge (under Lodge Lane / B5260) and back to the current Windy Harbour Junction. Traffic then re-joins miles of unimproved, relatively narrow roads along A588 to M55 junction 3 or eastwards to Great Eccleston and Garstang (A586).</p>	<p>The Applicant notes and has had regard to the comments made.</p>
<p>REP2-056.14</p>	<p>Additional observations</p> <p>The revised road layout will necessitate several erratic and circuitous routes:</p> <p>i) Traffic travelling from Shard Bridge / Shard Road wishing to access the new road will have to turn right at the Shard Road / Mains Lane junction and then turn left back on itself at the new Skippool Bridge Junction.</p> <p>Unfortunately, a more convenient alternative would be to turn left at the Shard Road / Mains Lane junction and proceed to the “old” Little Singleton junction and then on to Lodge Lane (B5260) and through Singleton village, thereby increasing traffic volume through this township.</p> <p>ii) Residents living near the Little Singleton junction or at the eastern end of Mains Lane also need to negotiate a zig-zag route to access the new road at Poulton Junction and may also be inclined to utilise the alternative route described above, through Singleton village. This may particularly apply to residents in the new housing development on Lodge Lane and traffic visiting Singleton Lodge Country House Hotel.</p>	<ol style="list-style-type: none"> 1) The Applicant does not agree. The de-trunking measures (which include a reduction in speed to 30mph) proposed on Mains Lane will make the road less desirable as a through road. Refer to the Traffic Regulation Measures and De-Trunking Plans (document reference TR010035/APP/2.8). 2) The Applicant considers this will have the effect of decreasing traffic through Singleton. The Transport Assessment (document reference TR010035/APP/7.4) shows that the traffic flows on Lodge Lane and Mile Road will be slightly higher northbound (most notably in the AM peak) but will reduce in the southbound direction in all time periods.
<p>REP2-056.15</p>	<p>Conclusion</p> <p>i) This proposed scheme will merely transfer and create more congestion and pollution than already exists.</p> <p>ii) It is fundamentally compromised and will generate more frustration as it includes three new highly complex junctions with many more traffic signals and potential opportunities for traffic flow interruption, congestion and inconvenience than is</p>	<p>The Applicant has had regard to the comments made and considers that these have been addressed above and in Comments On Further Representations Received At Deadline 1 (REP1-017 (document reference TR010035/APP/7.16)).</p>

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	<p>currently encountered.</p> <p>iii) It necessitates several conflicting and disjointed traffic flows, U-turns and hazardous access points.</p> <p>iv) It is an isolated scheme as it links at each end two-lane single carriageway roads (each approx. 4 miles in length), neither of which are to be modified. It will therefore do absolutely nothing to alleviate traffic density and congestion on these roads, one of which serves Fleetwood to the west.</p> <p>v) At its easterly end the A585 from Windy Harbour to M55 junction 3 has at least 70 access points directly onto it from residential property, farm premises and fields.</p> <p>vi) With a quoted budget of up to £150million, the potential journey time saving has been estimated to be around three minutes. The upheaval, inconvenience and delays that will be created during the scheme's two-year construction (much of it sacrificing swathes of green fields to the detriment of birds, wildlife and the very environment that we are continually encouraged to preserve) will completely negate this minimal journey time benefit.</p> <p>I would request that the Planning Inspectorate consider all the above observations when preparing its submission.</p>	
REP2-057	Mrs S J Brown	
REP2-057.1	<p>Highways England have recently produced a report – <i>'National Pinch Point Programme – One Year After Evaluation Meta-Analysis Version 1.0 November 22 2017 5150707 January 2019'</i>. The Executive Director's Foreword states "The evaluation has shown that across a 24-hour period we are not sustaining the journey time benefits we generate during peak periods, and predominantly this has been a consequence of 24-hour signalisation." Commenting specifically on Journey Time Benefits on page 8, the report states "Reducing congestion during the busiest periods of the day, or on severely delayed routes, was a specific objective for the vast majority (88%) of schemes within the sample, and there is evidence of success in achieving this with schemes producing in total £5.1m of benefit during the AM and PM peak periods, as these were the periods of the week with highest flows, but they also produced net dis-benefits of over £5.6m in non-peak periods of the week... ..journey time benefits experienced by road users during peak times have been offset by slower journeys during off peak periods which in turn has reduced the net benefit of schemes over a 24 hour period across the sample. Predominantly, this was caused by schemes which introduced signalisation (44% of the total sample) and led to small scale journey time dis-benefits for a number of off-peak road users which, when aggregated across a 24 hour period, led to adverse impacts for journey times overall in the opening year."</p>	<p>The report quoted relates to pinch point schemes which typically focus on a single junction. The A585 Scheme is a major project which has a wider focus looking across the strategic road network rather than on a single junction. The journey time benefits for this Scheme have been assessed on that basis.</p>
REP2-057.2	<p>The remit of Highways England's development proposal is to reduce the congestion between Windy Harbour and Skippool. The proposed dual carriageway might meet the objective of reducing journey time during peak times on the specific section of road covered by the planning application. However, insufficient consideration has been given to the capability of adjacent infrastructure to cope with the resulting</p>	<p>The Applicant has undertaken strategic and operational modelling to verify the performance of the junctions. Further detail is provided within Appendix H of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12).</p>

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	<p>increased traffic flow during peak periods and also the extent of delays caused to motorists using existing roads that link to the proposed new road throughout 24 hour periods. The effects of the proposed signal controlled junctions at Skippool are a particular concern.</p>	
<p>REP2-057.3</p>	<p>Traffic lights currently cause congestion at Little Singleton and Shard Road at certain times of the day - bypassing these junctions would obviously remove traffic build-up at these specific locations. But the planning application includes two new complicated traffic signal controlled junctions at Skippool that are likely to cause delays in a more densely populated residential area. In the proposed scheme, westbound traffic leaving the fast moving dual carriageway at Skippool Bridge Junction will have to pass the two new sets of traffic lights before feeding into the three single carriageway roads beyond Skippool Junction.</p> <p>These are:</p> <ul style="list-style-type: none"> a) Breck Road (A588) towards Poulton town centre, b) Skippool Road/Lambs Road (B5412) towards Thornton, and c) Amounderness Way (A585) towards Norcross/Carleton/Cleveleys. <p>All three roads are extensively used by local and commuter traffic; lengthy traffic tailbacks occur during the morning and evening rush hours. New housing developments at St John's Walk (49 houses) off Moorland Road in Poulton and at Kingsley Manor (165 houses) off Lambs Road in Thornton will place further pressure on Breck Road and Skippool Road.</p> <p>At the other end of the proposed new dual carriageway, eastbound traffic heading for the M55 will be held up on the single carriageway Fleetwood Road (A585) beyond Windy Harbour.</p> <p>Highways England acknowledged public concerns about increased congestion on Amounderness Way and Fleetwood Road in the <i>A585 Windy Harbour to Skippool Improvement Scheme Consultation Report Application Document Ref: TR010035/APP/5.1 Oct 2018 Section 5.8.6</i> and responded that traffic problems beyond the proposed new road are being considered by other departments but are 'outside the scope of the scheme'. But there is no reference anywhere to the existing daily congestion at peak times on Breck Road and Skippool Road (see Figs 1, 2 and 3; photos of tailbacks in traffic accessing Poulton in the morning and evening rush hours at various times of year). These narrow, busy roads struggle to cope with existing traffic levels and are not wide enough to accommodate an additional rapid influx of vehicles from the proposed dual carriageway; increased traffic tailbacks and associated higher pollution are inevitable.</p>	<p>At Skippool junction and Skippool Bridge junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays.</p> <p>The inclusion of planned developments within the traffic model has been discussed with the local authorities. Paragraphs 3.3.24-3.3.32 of the Transport Assessment (document reference TR010035/APP/7.4) summarise how extra traffic from committed developments is included in the traffic modelling. Paragraphs 3.3.27 to 3.3.32 describe how information from local authorities was collected. Each individual development was then classified as per Table 3.4. Any development that was classed as near certain or more than likely; developments under construction or approved development proposals or developments with a planning application within the consent process; were included in the Core Scenario forecasts. All other developments were classed as reasonably foreseeable and included in the Optimistic Scenario. As stated in the Transport Assessment the Scheme includes future provision for traffic growth year 2037 showing that the Scheme mainline has reserve capacity to support future development in the area.</p> <p>The area wide changes in traffic volume forecasted for 2022 and 2037 are presented Section 5.2 and Appendix A of the Transport Assessment (document reference TR010035/APP/7.4). This shows that the traffic flows on the A588 Breck Road will decrease in all time periods compared to without the scheme in place. In addition, the traffic flows on A585 Amounderness Way, Skippool Road and A585 will be similar between without and with scheme scenarios, therefore providing additional capacity at these junctions will reduce the congestion seen at these locations.</p>
<p>REP2-057.4</p>	<p>In meeting the remit of speeding up traffic flow to and from Windy Harbour the needs of local residents, local businesses and schools in Thornton, Poulton and Over Wyre have been overlooked. Not all road users in the area are aiming to get to/from the M55 at high speed; shorter journeys made by local motorists throughout the day are going to be made slower and more difficult with the new road junction proposals. Traffic currently moves freely on the existing Skippool roundabout at Amounderness</p>	<p>In preparing the application for the Scheme the Applicant has had regard to the needs of all road users.</p> <p>The Transport Assessment (document reference TR010035/APP/7.4) covers a wide area, focusing on the road network to the north of the M55 and to the west of the M6, including the principal settlements as shown in Figure 3.9 of Section 3 of the Transport Assessment.</p>

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	<p>Way/Breck Road/Skipool Road for the majority of the day (see Fig 4).</p> <ul style="list-style-type: none"> • The planned 4-way traffic signal at Skippool junction will interrupt the flow of traffic and cause tailbacks throughout the day. • Turning right at the junction in any direction will be a particular cause of delays with potential safety issues, even with motion sensitive traffic lights. • Eastbound motorists will face an inconvenient manoeuvre at the proposed Skippool Bridge junction to access Skippool Service Station. • Under the proposed scheme, all local traffic exiting or accessing Shard Road, whether heading to the M55 or Garstang Road east of Windy Harbour, will face a significant detour via Mains Lane and add to congestion and delays at Skippool Bridge junction. Using Lodge Lane (B5260) to get to the M55 from Shard Road is not a viable alternative route as turning right onto Fleetwood Road (A585) is always difficult because of traffic flow from the motorway. • The proposed junctions will introduce hazards and delays where none exist at the moment. 	<p>The traffic model consists of two key model areas; the Fully Modelled Area (FMA) and the External Area. The FMA is the area over which the Scheme is expected to have an influence, focusing on the A585 to the north of the M55 and to the west of the M6, including the principal settlements of Fleetwood, Blackpool, Cleveleys, Poulton-Le-Fylde, Singleton and a number of smaller areas as shown in Section 4.2 of Appendix E of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12).</p> <p>The FMA is further sub-divided into the Area of Detailed Modelling (ADM) and the Buffer Area. The ADM is the area over which significant impacts are expected and is characterised by small zones and detailed network. Paragraphs 5.4.11 - 5.4.16 of Appendix F of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) summarise the network statistics over this ADM for all forecast years which shows a reduction in travel time, an increase in average speed, and a decrease in delays.</p> <p>Please refer to response REP2-056.9 with regards to the 4-way traffic signal at Skippool junction.</p> <p>At Skippool Junction there would be a dedicated right-hand turn with sufficient stacking capacity to generally clear within one traffic light cycle.</p> <p>Please refer to response REP2-056.11 for the eastbound motorists accessing Skippool Service Station.</p> <p>Whilst there would be an increase in journey length for local traffic exiting or accessing Shard Road it is not believed this would be significant. Journey times would be similar as a result of travelling along the bypass.</p> <p>With regards to hazards and delays at proposed junctions please refer to Section 2.2. and paragraph 5.2.1 of the Planning Statement and National Policy Statement Accordance (document reference TR010035/APP/ document reference 7.1).</p>
REP2-057.5	<p>Section 5.9 of the abovementioned Consultation Report Document Ref: TR010035/APP/5.1</p> <p>Oct 2018 states 'It is clear from this data that the majority of respondents disagree that the proposed traffic signals will address the traffic flow issues at Skippool Junction and Skippool Bridge' but goes on to say 'The responses raised ...are all areas which have already been considered during the design and development of the Scheme and consequently did not result in any changes'. Effectively, Highways England overruled concerns of local residents raised in the consultation process.</p>	<p>The Consultation Report (Document Ref: TR010035/APP/5.1) documents the findings from the Customer Response Forms and, in accordance with s49 of the Planning Act 2008, the account taken to the responses received. The Applicant did not overrule concerns raised. Rather it was intended to indicate that the comments raised by members of the public had already been taken into consideration within the traffic modelling and operational modelling which was undertaken to inform the design.</p>
REP2-057.6	<p>Environmental issues should also be given greater consideration. In 2016 EarthSense, an organisation specialising in accurate air quality monitoring, created a UK-wide map showing localised nitrogen dioxide pollution levels; this could be accessed from the BBC News website https://www.bbc.co.uk/news/science-</p>	<p>The air quality assessment concludes that the Scheme would not have a significant effect on local air quality. The air quality assessment presented in Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6) has been undertaken in accordance with government advice in relation to both the air quality modelling and monitoring. The air quality</p>

Reference Number	Comment from Written Representation	Response to Written Representation
	<p>environment-42566393 The results for the Skippool postcode (Fig 5) show NO2 levels are already likely to exceed annual legal limits. Vehicles waiting at red lights throughout the day and night at the proposed signal controlled junctions will add to air pollution affecting pedestrians, cyclists and local residents.</p>	<p>monitoring that has been utilised in the assessment and used to validate the air quality model predictions is based on measurements which are taken in accordance with relevant guidance. As part of the assessment air quality, monitoring has been undertaken at roadside locations, which requires installation of actual monitoring equipment in the locality of the Scheme. This results in robust measurements and predictions than UK wide information provided by Earthsense which is published on a 100m x 100m resolution. The air quality model has therefore been validated based on actual measurements collected in the locality of the Scheme. The impact of congestion and changes in traffic flows as a result of the Scheme have been taken into consideration in the air quality assessment utilising the traffic modelling undertaken to determine the schemes impacts on traffic flows.</p>
<p>REP2-057.7</p>	<p>The new road junctions and additional traffic lanes at Skippool will require large areas which are currently turfed to be covered in tarmac. This will add to surface water run-off in a flood risk area where drainage and potential tidal flooding from the adjacent Wyre Estuary is already an issue. <i>Appendix A of Highways England Flood Risk Assessment TR010035 5.2 Part 1 (Oct 2018)</i> shows that the Skippool junctions are both in Flood Zone 3 with a high risk of tidal and river flooding. Properties in the Skippool area have received several flood warnings in recent years, most recently in March 2019 (Fig 6). Local tide tables for Wyre estuary show that high tides regularly reach heights over 10m; at these times Skippool Creek, at the Horsebridge Dyke outflow adjacent to Skippool roundabout, overflows its banks (Figs 7 and 8)</p>	<p>The Scheme drainage design provides for attenuation of rainfall runoff from impermeable surfaces, ensuring that new discharges to receiving watercourses are made at greenfield rates, and discharges from existing outfalls are limited to existing rates. This will ensure no detriment to existing surface water flood risk.</p> <p>A Flood Risk Assessment has been prepared for the Scheme and the Environment Agency has accepted its contents (document reference TR010035/APP/5.2-rev 1).</p> <p>It should be noted that the local tide tables give high tide levels related to Chart Datum that is not the same as Ordnance Datum used on land. The conversion between Chart Datum and Ordnance datum for the River Wyre area is to subtract 4.9m from the Chart Datum – see link https://www.ntsif.org/tides/datum.</p>
<p>REP2-057.8</p>	<p>To summarise, any benefits produced by the scheme in reducing peak time traffic congestion specifically between Windy Harbour and Skippool will be offset by:</p> <ul style="list-style-type: none"> • delays to journey times elsewhere that affect local residents and local businesses, • an increase in air pollution in residential areas from traffic held up at traffic lights, • a potential increased flood risk from developing in an existing flood risk zone. <p>In drawing up this road proposal Highways England have taken insufficient account of the adverse effects that the development will generate.</p>	<p>The Applicant notes and has had regard to the comments made.</p>
<p>REP2-058</p>	<p>Mr Buckley</p>	
<p>REP2-058.1</p>	<p>I welcome the decision of the Examining Authority to inspect my property at to assess the impact of the scheme upon it.</p>	<p>The subsoil interest is the parcel of land in relation to the western half width of the existing highway (A588 Breck Road), refer to plot 1/07b in the Land Plans (document reference TR010035/APP/2.1) and Book of Reference (document reference TR010035/APP/4.3). At this location there is no further encroachment than the current arrangement of the existing highway.</p>
<p>REP2-058.2</p>	<p>During and after the Preliminary Meeting and Open Floor Hearing it became apparent that the Scheme envisages Highways England compulsory purchasing my interest in the land outside and to the North of my front gate. Highways England maintain that it is only my interest under the subsoil of the existing A585 highway which is in issue (and, therefore, of little value), I do not necessarily accept that this is so. I seek Further and Better Particulars of the proposal, and while I am always prepared to enter into negotiations to resolve any differences, any outstanding matter may need to be resolved by way of an Issue Specific Hearing. In any event, even if the land is restricted to my interest in the subsoil, it demonstrates the extent to which the proposed widening of the A588 to create a slip road encroaches on to home with loss</p>	<p>The Applicant's previous responses to the relevant representations (RR-005, paragraph 5.3 to 5.5) should be referred to.</p>

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	of privacy, noxious fumes, traffic noise etc. coupled with tail backs from traffic waiting to enter the A585 (thereby further restricting my ability to exit and enter my property at busy times), as well as a reduction in value.	
REP2-058.3	It also was revealed at the open meeting that the proposal to replace the roundabout with traffic lights at the junction of the A588 with the A585 is coupled with a proposal to replace and renew the water culvert which flows from the River Wyre underneath the existing roundabout and into Horsebridge Dyke which constitutes part of the Easterly boundary to my property. This means that substantial engineering works are proposed during the implementation and construction of the Scheme which alone will create substantial nuisance, noise and inconvenience. Moreover, my concerns are the waters that flow through the culvert and into the dyke are tidal. At the present time, the tidal flow is controlled by a delicate mechanism under the roundabout to prevent flooding. On at least one occasion to my knowledge Horsebridge Dyke has become blocked which caused the dyke to flood the farmers' fields which are situate to the South and West of my property.	<p><u>Noise</u> Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) outlines that daytime temporary construction noise levels are unlikely to be significant based upon the guidance of BS 5228-1:2009+A1:2014; this was also concluded to be the case for any overnight construction works. However, construction noise and vibration will be further controlled through a Construction Noise and Vibration Management Plan forming part of the formal Construction Environmental Management Plan (CEMP) which is secured through the dDCO (document reference TR010035/APP/3.1) and a Section 61 Consent. The scope of the CEMP and Noise and Vibration Management Plan will be consulted on and implemented in association with Fylde and Wyre Borough Council's Environmental Health Departments. Mitigation will then be implemented on an active basis to control construction noise and vibration.</p> <p><u>Skippool Clough Culvert</u> The proposed replacement culvert will include for a mechanism at the culvert outfall (at the north end of the culvert) to prevent tidal ingress upstream along the Horsebridge Dyke. The existing culvert has a number of internal bends and changes of diameter. The design of the replacement culvert reduces blockage risk, being of a uniform (and slightly larger) diameter and avoiding internal angles/bends. The design proposals for the replacement culvert have been reviewed and approved in principle by the Environment Agency. A Technical Note for the new culvert is appended to the draft Statement of Common Ground with the Environment Agency (document reference TR010035/APP/8.3).</p>
REP2-058.4	I understand that Highways England view the construction of the new junction as an opportunity to renew the infrastructure under the roundabout junction which is now forty years old. I accept the wisdom of that. However, that part of Horsebridge Dyke into which the culvert runs and which forms part of the Easterly boundary of my property is substantially in excess of forty years old and I question how it will cope with a connection to a new culvert carrying with it a significant flow of powerful tidal surges. I seek from Highways England proposals which will ensure that the construction of a new culvert under the new traffic light junction will be coupled with the construction of a two metre high fence along the top of the embankment and any further reconstruction works to make the Dyke which forms my easterly boundary secure and safe	The section of Horsebridge Dyke south of Skippool Junction is not subject to tidal waters due to the presence of a flap valve on the existing northern headwall that prevents the high tide waters from moving upstream. However, the flap valve does prevent water upstream from being discharged during those high tides. The arrangement of a tidal flap valve would be re-provided on the northern headwall of the proposed replacement culvert. Measures will be included to prevent scour and erosion at the culvert inlet and outlet and the proposed replacement culvert will include for a mechanism at the culvert outfall to prevent tidal ingress upstream along the Horsebridge Dyke. The design proposals for the replacement culvert have been reviewed and approved in principle by the Environment Agency as having no detriment to existing flood risk. A Technical Note for the new culvert is appended to the draft Statement of Common Ground with the Environment Agency (document reference TR010035/APP/8.3). A 2m high fence is not necessary.
REP2-058.5	I accept that something needs to be done about the ever-increasing volume of traffic which affects the junction. However, the proposed development will have a significant impact upon my enjoyment of the property and also its value. My home has recently been "highly commended" at a Local Authority Building Control awards ceremony in	Proposals for the re-modifying of Skippool Junction can be found in the General Arrangement Drawings (document reference TR010035/APP/2.5). Also refer to 1.8.4 in the Responses to the Examining Authority's Written Questions (document reference TR010035/APP/7.10) for details of how the Scheme will impact the parcel of land.

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	<p>Manchester in the “Best Individual Home” category against competition from the whole of the North West. The fact is that I doubt whether I would have proceeded with the development (i.e. the demolition of my old family home and the proposed construction of two family homes on the site) if I had been aware of these proposals. Certainly I am delaying the construction of the second house until I can see how the proposed development is to be implemented.</p>	
REP2-058.6	<p>If an the Order Granting Development Consent is to be made, therefore, I seek the following:</p> <p>a. the erection of a suitable solid two metre high sound-proofing fence along the Northerly Boundary of my property together with appropriate landscaping</p> <p>b. the erection of a similar fence and landscaping at the top of the embankment which runs along the Dyke to the East of my property. (This may have to be done with cooperation from, and in conjunction with, Wyre Council, Lancashire County Council and the Environment Agency). A site visit will demonstrate that the fence needs to be situate at the top of embankment (rather than along my actual boundary) because of the elevation of the highway at this point.</p> <p>c. such steps which are needed to be taken to ensure that the construction of the proposed new culvert under the proposed traffic light junction can safely be linked to an appropriately reconstructed Horsebridge Dyke and that the smooth flow of fast flowing tidal water can be safely and securely managed. It may be necessary (and certainly would be safer and, in my submission, more environmentally friendly) if the construction of a new culvert under the roundabout could be linked to a reconstructed Horsebridge Dyke (ideally enclosed underground) which would renew or replace the existing boundary</p> <p>d. I am prepared to enter into negotiations with the Applicant on the above mentioned matters but if it is not possible to reach a resolution, I would seek an order that they be listed for issue specific hearings.</p> <p>e. The Applicant proposes to acquire compulsorily land in the North East corner of my property and land fronting and to the North East of my front gate. Again, I am prepared to enter into negotiations but if these do not come to fruition I would seek compulsory purchase hearings in relation to them.</p>	<p>a. The erection of a sound-proof fence is not required as part of the Scheme. The new slip road/junction improvements would have a negligible effect on road traffic noise in this area due to these levels being mitigated to a minimum and below a level where significant adverse effects on health would occur through the use of low noise surfacing on both the new slip and across the proposed new junction alignment refer to Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).</p> <p>b. The erection of a similar sound-proof fence is not required on the eastern boundary as no noise mitigation is required in this location. However, the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1) submitted at Deadline 2 shows that approximately 15m of fencing will be provided for the property to replace the existing boundary treatment along the line of the draft order limits affected by the construction of the replacement culvert.</p> <p>c. Measures will be included to prevent scour and erosion at the culvert inlet and outlet and the proposed replacement culvert will include for a mechanism at the culvert outfall to prevent tidal ingress upstream along the Horsebridge Dyke. The design proposals for the replacement culvert have been reviewed and approved in principle by the Environment Agency as having no detriment to existing flood risk.</p> <p>It is considered that the suggestion to extend the culvert southwards to replace the existing watercourse channel over a length of about 50m is unlikely to be acceptable to the Environment Agency as this would connect to the existing culvert under the driveway to Nos 181 and 183 Breck Road and would introduce two enclosed changes of direction within the extended culvert and could increase the flooding risk upstream of this location.</p> <p>d. The Applicant is already in discussions with Mr Buckley. The Applicant does not consider it appropriate for there to be an Issue Specific Hearing in relation to this matter.</p> <p>e. Refer to section 5.6 in Comments on Relevant Representations (document reference TR010035/APP/7.9).</p>
REP2-060	Cadent Gas Limited	
REP2-060.1	<p>Cadent Gas Limited ("Cadent") have made a relevant representation in this matter on 22nd January 2019 in order to protect apparatus owned by Cadent. Cadent does not object in principle to the development proposed by the Promoter. Cadent does, however, object to the Authorised Works being carried out in close proximity to their Apparatus in the area unless and until suitable protective provisions and related agreements have been secured to their satisfaction, to which see further at paragraph</p>	<p>The Applicant is in discussions with Cadent regarding the issues raised. The protective provisions included in the draft DCO are under review and a Statement of Common Ground is being progressed.</p>

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	<p>4. They also object to any compulsory acquisition powers for land or rights or other related powers to survey, temporary acquisition powers or to override easements or rights or the stopping up public or private rights of access being invoked which would affect their existing Apparatus, or right to access and maintain their existing Apparatus. This is unless and until suitable protective provisions and any necessary related amendments to the wording of the DCO have been agreed and included in the Order or otherwise addressed between the parties.</p>	
REP2-060.2	<p>Cadent wish to ensure appropriate land rights are available for any diversion of their assets sitting outside the adopted highway boundary and will require crossing agreements where there are proposals to work within the easement strip of any existing Cadent's Apparatus, to which see further at paragraph 2.</p>	<p>The Applicant has included within the draft DCO all necessary land interests required to deliver the Scheme, including those anticipated to be required for the diversion of Cadent's assets.</p>
REP2-060.3	<p>Cadent is holder of a licence under section 7 of the Gas Act 1986 and operates four gas distribution networks in North London, Central England (West and East) and the North West</p>	<p>Noted, no further response required.</p>
REP2-060.4	<p>Cadent is required to comply with the terms of its Licence in the delivery of its statutory responsibilities. It is regulated by the Network Code which contains relevant conditions as to safe transmission of gas and compliance with industry standards on transmission, connection and safe working in the vicinity of its Apparatus, to which see paragraph 3.</p>	<p>Noted, no further response required.</p>
REP2-060.5	<p>Cadent has Low and Medium Pressure Gas Pipelines, assets and associated equipment ("Apparatus") within the highway in the Order Boundary as shown on the Plan in Appendix 1. Low Pressure and Medium Pressure mains are located in the highway and will be affected by the Authorised Works. In particular the Authorise Works provide for seven diversions of Cadent Apparatus, namely in Works No. 16, 33, 51, 67, 69, 80 and 112.</p>	<p>Noted, no further response required.</p>
REP2-060.6	<p>As Highways England have not yet commissioned and paid for the C4 diversion design work, the detail of the alignment of these diversions are currently unknown. Accordingly it is not possible to confirm whether these diversions will be capable of being carried out fully under the New Roads and Street Works Act 1981 or not. Where they extend beyond the adopted highway boundary, Cadent will require new land rights to be secured by the Promoter through the DCO for any diverted apparatus. Such rights will need to be made available to Cadent by the Promoter before any existing Apparatus is removed, in order to prevent an impact on the Apparatus required for the delivery of Cadent's Statutory Undertaking, which is protected by Section 127 and s138 of the Planning Act 2008. Cadent's apparatus required for the purposes of their statutory undertaking should not be authorised for acquisition where it's replacement by way of diversion and delivery of appropriate corresponding rights cannot be secured. Appropriately worded protective provisions for the benefit of Cadent will secure this and prevent detriment to the Statutory Undertakers undertaking.</p>	<p>Refer to response REP2-060.2 above. The Applicant is now in dialogue with the Contractor which will allow the C4 design work to be progressed in due course.</p>
REP2-060.7	<p>At this stage in the absence of the detailed design of the diversion works Cadent</p>	<p>Refer to response REP2-060.6 above.</p>

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	<p>cannot comment on (i) diversion route and/or (ii) whether the necessary land rights have been secured by the Order. In these circumstances therefor it is essential that Protective Provisions on Cadent's standard terms are agreed and included in the Order to prevent the acquisition of any of their existing Apparatus other than by agreement. Diversion will then follow in future by agreement between the parties in accordance with the terms of the Protective Provisions which will require the grant of property rights before the overriding of any existing rights can occur, thus protecting the Statutory Undertaker's undertaking. It should be noted that any consequent program delay arising from the Promoter failing to include the necessary land or rights within the Order, will be as a direct result of the Promoters failure to commission sufficiently detailed design of the Diversions in advance of promotion of the Development Consent Order.</p>	
REP2-060.8	<p>In respect of all Cadent infrastructure located within the DCO boundary, or in close proximity to the proposed project and associated works, Cadent will therefore require protective provisions to be put in place to ensure:</p> <ul style="list-style-type: none"> (i) that all Cadent interests and rights of access are unaffected by the power of compulsory acquisition, grant and extinguishment of rights, survey powers and temporary use powers and temporary or permanent stopping up unless and until diverted under the Protective Provisions; and (ii) to ensure that appropriate protection for the retained apparatus is maintained during and after construction of the project. This includes compliance with all relevant standards on safety as set out in paragraph 3 below; and (iii) to ensure that Deeds of ConsenUCrossing Agreements are entered into where any work is proposed in the easement strip of Cadent, which doesn't necessitate it's diversion. 	Refer to response REP2-060.1 above.
REP2-060.9	<p>Cadent have sought to engage with the Promoter since at least April 2018 in order to seek to agree in advance the Protective Provisions ahead of the submission of the DCO and to avoid engagement in the examination process. However there was no substantive engagement or response from the Promoter until 26th March 2019, although reasonable progress towards agreeing protective provisions is now being made. Cadent also have various concerns about the drafting of the Order but will liaise with the Promoter directly to seek to resolve any such issue in the first instance. Accordingly we have not raised any of these issues in detail at this stage but reserved the right to raise issues on the drafting of the DCO should the promoter not proceed to put in place agreed Protective Provisions in the dDCO</p>	Refer to response REP2-060.1 above.
REP2-060.10	<p>Cadent require all Promoters carrying out Authorised Development in the vicinity of their Apparatus to comply with</p> <ul style="list-style-type: none"> • TSP/SSW/22 - Safe Working in the vicinity of Cadent's Gas Assets; • ICE (institution of Gas Engineers) recommendations IGE/SR/18 Edition 2 Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations, and • The HSE's guidance document HS(G)47 Avoiding Danger from Underground 	Noted, no further response required.

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	Services.	
REP2-060.11	The industry standards referred to above have the specific intention of protecting: (a) The integrity of the pipelines and thus the distribution of gas; (b) The safety of the area surrounding gas pipelines; (c) The safety of personnel involved in working with gas pipelines	Noted, no further response required.
REP2-060.12	Cadent requires specific protective provisions in place for an appropriate level of control and assurance that the industry regulatory standards will be complied with in connection with works in the vicinity of Cadent's Apparatus.	Noted, no further response required.
REP2-060.13	Cadent seeks to protect its statutory undertaking, and insists that in respect of connections and work in close proximity to their Apparatus as part of the authorised development the following procedures are complied with by the Applicant: (a) Cadent is in control of the plans, methodology and specification for works within 15 metres of any Apparatus, works which will adversely affect their Apparatus or otherwise breach distances/guidance set out in paragraph 3 above; (b) DCO works in the vicinity of Cadent's apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of Cadent's land or rights or overriding or interference with the same.	Noted, no further response required.
REP2-060.14	Cadent maintain that without an agreement or qualification on the exercise of unfettered compulsory powers or connection to its Apparatus the following consequences will arise: <ul style="list-style-type: none"> Failure to comply with industry safety standards, legal requirements and Health and Safety Executive standards create a health and safety risk; Any damage to Apparatus has potentially serious hazardous consequences for individuals/property located in the vicinity of the pipeline/apparatus if it were to fail;. Potentially significant consequences arising from lack of continuity of supply; 	Noted, no further response required.
REP2-060.15	Insufficient property rights have the following safety implications: <ul style="list-style-type: none"> Inability for qualified personnel to access apparatus for its maintenance, repair and inspection. Risk of strike to pipeline if development occurs within the easement zone in respect of which an easement/restrictive covenant is required to protect the pipeline from development. Risk of inappropriate development within the vicinity of the pipeline increasing the risk of the above. 	Noted, no further response required.
REP2-060.16	The proposed Order does not yet contain fully agreed Protective Provisions expressed to be for the protection of Cadent to Cadent's satisfaction, making it currently deficient from Cadent's perspective nor does it address fully how property rights will be made available for the diversion of Cadent's assets to their satisfaction where compulsion, rather than agreement with a third party land owner is necessary.	Noted, no further response required.
REP2-060.17	Cadent contend that it is essential that these issues are addressed to their satisfaction to ensure adequate protection for their Apparatus and that Protective Provisions on their standard terms are provided.	Noted, no further response required.
REP2-060.18	Should this not be possible and attendance at a Compulsory Acquisition Hearing or	Noted, no further response required.

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	Issue Specific Hearing is necessary then Cadent reserve the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage once they have received a substantive response from the promoter.	
REP2-062	Environment Agency	
REP2-062.1	<p>Following the submission of our Relevant Representation on 24 January 2019, we have continued to work with the Applicant's consultant (Arcadis) to address the issues raised within our representation.</p> <p>Our current position on the application is that our concerns have mainly been satisfied since our Relevant Representation, though some remain and are outlined below. For this reason, some issues are still considered Under Discussion in the draft Statement of Common Ground (SoCG) submitted by the Applicant and is therefore by no means final or agreed, and will not be signed off by either party, at this stage.</p>	Noted, no further response required.
REP2-062.2	<p>Since our Relevant Representation, the Applicant has satisfactorily addressed our concerns with their tidal modelling and in relation to the impacts of climate change on tidal flood risk following the publication of the UK Climate Projections 18 (UKCP18). This has been reflected in their revised Flood Risk Assessment (FRA), application document reference TR010035/APP/5.2 (Rev 1), dated May 2019, which we recently reviewed though a charged planning advice agreement prior to submission.</p>	Noted, no further response required.
REP2-062.3	<p>In summary, having been involved in discussions with the Applicant's consultant and having reviewed the various preceding iterations of the FRA, we can confirm that we are generally satisfied with the content of the revised FRA and that in principal, and being subject to further detailed design, the FRA demonstrates that the proposed development will not be at an unacceptable risk of flooding or exacerbate flood risk elsewhere, either as the permanent proposal or during the construction phase.</p>	Noted, no further response required.
REP2-062.4	<p>The FRA and the Applicant's enhanced tidal model results confirm that small parts of the Scheme immediately east of Skippool Junction are at risk of tidal flooding during a 0.5% Annual Exceedance Probability (i.e. the 1 in 200 year annual probability) event with and without an allowance for climate change. Tidal flooding was concluded as the main source of flood risk to the operational Scheme. It should be noted that the existing road network is currently at risk of tidal flooding. Parts of the scheme will therefore remain at risk of tidal flooding, as built mitigation cannot be provided to ensure these parts are free from flooding in a design flood for the lifetime of the development. As such, to comply with the requirements of the National Planning Policy Framework (NPPF), a robust Flood Warning and Evacuation Plan must be submitted as part of the Development Consent Order (DCO) application, and referred to a key document in the DCO itself. The flood warning and emergency response is fundamental to managing the flood risk associated with the development, and the Examining Authority will need to formally consider the emergency planning and rescue implications.</p>	<p>A draft Flood Warning and Evacuation Plan was submitted to the Examining Authority at Deadline 2. The draft Plan can be found at Appendix Q of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 1). Reference has also been made to the Flood Warning and Evacuation Plan in Requirement 4 of the draft DCO and this document will form part of the Construction Environmental Management Plan.</p>
REP2-062.5	<p>We are satisfied that section 11, Recommendations, Securing of Commitments, and subsequent sub-paragraphs 11.1.1 to 11.1.21, adequately addresses the associated</p>	Noted, no further response required.

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	flood risk requirements to be secured, acknowledging that in particular and in common with the design for the compensation storage, that these aspects will be developed during the next stage of design. In particular, but not exclusively, the compensation area and other relevant works would subsequently be required to gain consent in accordance with the requirements of the Environmental Permitting (England & Wales) Regulations 2016 (EPR 2016) for certain elements, and through the discharge of a Requirement to be included in the DCO for works outside of the EPR 2016.	
REP2-062.6	The proposed temporary compensatory flood storage area is a flood risk critical aspect of the scheme that is not yet designed. The detailed design of the compensatory flood storage scheme required to ensure flood risk is not increased elsewhere during the construction phase. The proposed scheme will only meet the requirements of the NPPF and National Policy Statement for National Networks if a Requirement is included in the DCO in relation to the submission of details confirming the proposed design, function, construction and decommissioning of the temporary compensatory flood storage area. We will discuss the draft of the Requirement with the Applicant's consultant.	The Applicant is in discussion with the Environment Agency about the flood storage areas including the means by which these will be secured.
REP2-062.7	Given the above, the proposed scheme will therefore only meet the requirements of the NPPF and National Policy Statement for National Networks provided it proceeds in strict accordance with the mitigation measures and the design parameters identified within the FRA, and subject to the following requirements to be agreed: i. a satisfactory flood warning and evacuation plan to be listed as key document in the DCO; and ii. the inclusion in the DCO of a Requirement for the submission of details confirming the proposed design, function, construction and decommissioning of the temporary compensatory flood storage area.	Please refer to response REP2-062.4 and REP2-062.6.
REP2-062.8	We do not comment on or approve the adequacy of Flood Warning and Evacuation Plans (FWEPs) or equivalent procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with most developments during an emergency will be limited to delivering flood warnings.	Noted, no further response required.
REP2-062.9	It is for the Examining Authority to decide if access and egress arrangements are 'safe' and determine whether the FWEF or equivalent procedures are sufficient or not. As such, we recommend you consult with emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the national Planning Practice Guidance.	Noted, no further response required.
REP2-062.10	Through a charged planning advice agreement, we have however reviewed the Applicant's draft Flood Warning and Evacuation Plan (FWEF) prior to submission and, insofar as it relates to our remit, we identified a number of deficiencies which we have communicated to the Applicant's consultant. We consider that these deficiencies will need to be addressed in order to provide a fully informed evacuation plan.	The deficiencies noted were addressed in the draft Flood Warning and Evacuation Plan (Appendix Q of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 1)) submitted at Deadline 2 to the Examining Authority.
REP2-062.11	Our remit covers the provision of advice on the technical aspects relating the availability of our flood warning service and the likely duration, depths, velocities and	Details of modelled durations, depths and velocities of floodwaters have been added to the draft Flood Warning and Evacuation Plan (Appendix Q of the Outline Construction

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	flood hazard rating against the design flood event for the proposed development, but we are unable to provide further comment at this time as some of this information is missing from the FWEP. We will continue to work with the Applicant's consultant to address these issues throughout the Examination period.	Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 1)) submitted at Deadline 2 to the Examining Authority. It is noted that the submitted document is a draft and will be further developed by the Contractor during the next stage of the Scheme's design.
REP2-062.12	We have reviewed the Applicant's technical note (Technical Note 4001 – Skippool Clough Culvert (Ref HE54863-ARC-SMNA585-TN-C-4001; Version 1; dated 26 April 2019) in relation to the proposed replacement of Skippool Clough Culvert and it has addressed our concerns which were raised in relation to consultation on a previous drawing. It should be noted that the technical note states that detailed design is still progressing. As such, we cannot confirm at this stage if the proposals area acceptable in relation to the EPR 2016, however they are acceptable in principal on the basis of the information currently presented.	Noted, no further response required.
REP2-062.13	Following further discussions the Applicant has confirmed to us that they are not seeking to disapply any Environment Agency permits or consents, which will be reflected in the updated draft SoCG. The Applicant has also confirmed in the draft SoCG that the revised draft Development Consent Order (dDCO) will therefore not include protective provisions for our benefit. As such, we are pleased that this matter has been resolved following our Relevant Representation.	Noted, no further response required.
REP2-062.14	We are happy to provide clarification of any of the points above if this is required. We look forward to continuing to work with the Applicant and their consultants to resolve any outstanding matters and to ensure the best environmental outcome for this project. Our comments given in our Relevant Representation in relation to other issues within our remit and the EPR 2016 remain applicable at this stage. We may need to add to or amend the matters set out in this Written Representation as further information is provided throughout the Examination period.	Please refer to response REP2-062.6.
REP2-063	Fleetwood Renewable Energy Enterprise 2007	
REP2-063.1	We are concerned that the above Scheme will not improve communication to Fleetwood which have become progressively worse following the Fleetwood and Thornton Area Action Plan. It seems to us that greater use can be made of the River Wyre which is an asset of huge benefit for the area and the reason for the Town being built. It could now be used to reduce traffic congestion over a wide area and managed to prevent flooding whilst producing renewable energy. We trust that in preparing your report for road improvements you will take all these benefits into consideration.	The Applicant notes and has had regard to the comments made.
REP2-063.2	Introduction The Borough of Fleetwood was a town of high employment when it was amalgamated with a number of nearby Urban District Councils to form Wyre Borough. The Town had been an area of high employment until the collapse of the UK fishing industry and the closure of the ICI chemical plants. The loss of employment in the Town resulted in an increase in commuters. Originally the Town had been well planned with residential and industrial areas and the Local Authority sought to reverse the decline with a series of Master and Action	The Applicant notes and has had regard to the comments made.

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	<p>Plans starting in 2007. These schemes concentrated on building large scale housing developments on brownfield sites including one on reclaimed industrial land between the River Wyre and the Dock.</p> <p>Congestion on the A585 was already a concern and additional residents would create more commuters. The attached letter from Wyre Planning Services refers to the Fleetwood and Thornton Area Action Plan acknowledging the limited road capacity for vehicles from 1300 additional homes and the potential flood risk issues.</p>	
REP2-063.3	<p>Limited Road capacity</p> <p>Congestion on the A585's narrow two lane roads to Fleetwood made potential employers wary of expanding in Fleetwood and poor road access later contributed to the closure of the Ferry Service to Ireland.</p> <p>To deal with additional traffic from the proposed housing developments individual junctions were assessed for improvements on the A585 and the cost was to be apportioned to proposed housing developments. Drawings were prepared for improving 12 junctions but only 3 of the junctions were significantly modified. The junctions that were modified were not those that created the greatest congestion. The modification to the Windy Harbour Junction has not significantly improved traffic flow. Reducing two lanes to one over a short distance on Fleetwood Road tends to create conflict and is a hazard for drivers.</p> <p>The Planning Inspector was perceptive in questioning the soundness of the Area Action Plan with regard to traffic implications. In the event the proposed improvements, albeit of questionable value, were not undertaken and congestion has increased.</p>	<p>One of the objectives of the Scheme is to realise the benefits of the Windy Harbour junction improvements.</p> <p>As defined in Highways England's RIS 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. It is acknowledged that although altering the Scheme extent would change the Scheme's Economic Assessment result, the Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in the Planning Statement and National Policy Accordance (Document reference TR010035/APP/7.1) Section 2.9.</p> <p>In addition, the Highways England Asset Renewal Programme is conducting investigatory studies for possible junction improvements at Norcross, the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in Appendices F and H of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12).</p>
REP2-063.4	<p>The present gridlock from Skippool to Norcross is caused by the cumulative effect of stoppages at Shard Road. The resulting tailback is greater than that from Windy Harbour to Little Singleton which is the basis for spending £150 million pounds on the bypass.</p> <p>Beyond Skippool the bypass will simply move traffic queues gathering from Shard Road to Skippool. Here the stoppage time will be greater and Skippool being 1000 metres nearer to Norcross, congestion will extend to at least Victoria Road.</p> <p>On the basis of an analysis of traffic movements on the A585 there are no grounds to assume that traffic lights at Skippool and Norcross will reduce congestion. There are no details of the traffic light arrangement at the Skippool "U" turn which could cause considerable delays.</p> <p>Queues from Victoria Road to Skippool Bridge will be double the length of those from Windy Harbour to Skippool. This will increase gridlock to and from the coast and inhibit economic growth.</p>	<p>The Norcross junction improvements will be completed in advance of the Scheme. The Norcross scheme is predicted to deliver journey time benefits and reduce queuing which will provide capacity growth in the future. When completed, both schemes would complement one another.</p> <p>Details of the traffic light arrangements are presented on the General Arrangement Drawings (document reference TR010035/APP/2.5). The overall cycle time at the signals would vary depending on the traffic flows at different times of the day but have been tested with a limit of 135 seconds. Please also refer to AS-022.10 of the Comments on Relevant Representations (document reference TR010035/APP/7.9).</p> <p>The impact of the Scheme on traffic flow and distribution is presented in the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12). At Skippool junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays</p>
REP2-063.5	<p>Flooding from the River Wyre</p> <p>In view of the flood risk there was an argument that this aspect of the Fleetwood and</p>	<p>Please refer to the Flood Risk Assessment (document reference TR010035/APP/5.2 – rev 1) which has been agreed with the Environment Agency.</p>

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	<p>Thornton Area Action Plan should been reviewed. Wyre Council reported that flooding from the River Wyre relating to the Dock development was low risk in relation to a 1 in 200 year flood. The attached Sketch No FR 2100 based on expert opinion shows that this is not the case.</p> <p>Before the housing development took place on the dock sand was pumped from the River Wyre to raise the ground. It was not raised sufficiently to prevent overtopping from a 1 in 200 years storm or one similar to the 1927 flood.</p> <p>Wyre Council were warned by a senior member of staff at the Environment Agency of this risk who also warned that the Agency would have no responsibility for any loss of land and property.</p> <p>This risk could be eliminated with a flood barrier at the mouth of the river as they have at Ipswich to prevent similar flooding. It is not clear why such a scheme has been opposed for 12 years by Wyre Council.</p> <p>The bypass will not meet the criteria of reducing grid-lock and increase economic growth which is the stated aim of the Fylde Coast Highways and Transport Masterplan.</p> <p>With a flood barrier in place a road to the M6 across Pilling Sands could be built for a small fraction of the value of land and property at risk from flooding. This route would take pressure off the A585 and make Wyre Council into a more inclusive unit.</p>	
REP2-066	Fylde Borough Council	
REP2-066.1	Fylde Borough Council (FBC) submitted a Relevant Representation (RR) to the Planning Inspectorate on 24 January 2019 setting out its views on the application under seven topic headings. A copy of that RR is attached at Appendix 1 below.	Noted, no further response required.
REP2-066.2	FBC has provided a detailed commentary on the development's positive, neutral and negative effects in its Local Impact Report (LIR) – FBC document reference 2.2. The LIR also makes observations concerning the adequacy of the draft Development Consent Order (dDCO), including the Council's views on the need for amendments and additions to it.	Noted, no further response required.
REP2-066.3	Matters of agreement and disagreement between the Applicant and FBC are highlighted in the Statement of Common Ground (SoCG) – FBC document reference 2.3. Where FBC considers that amendments are needed to the Articles and Requirements in the dDCO, these are clearly identified in the SoCG.	Noted, no further response required
REP2-066.4	FBC has given detailed responses to the Examining Authority's (ExA) first written questions (ExQ1) – FBC document reference 2.4, where it expands upon and provides evidence in relation to its observations concerning several of the Principal Issues identified in the ExA's Rule 6 letter (as cross referenced in the LIR).	Noted, no further response required.
REP2-066.5	FBC has, where necessary, provided its latest responses to the Applicant's comments on the Council's RR in a separate document – FBC document reference 2.5. FBC would ask that those responses are read alongside its RR at Appendix 1.	Noted, no further response required.
REP2-066.6	When read in conjunction with the detailed submissions mentioned above, FBC considers that the representations in Appendix 1 continue to provide an accurate summary of its position on the Application. Accordingly, the Council does not wish to	Noted, no further response required.

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	make any additional written representations beyond those already set out in its RR (as amended and/or supplemented by document reference 2.5).	
REP2-071	Natural England	
REP2-071.1	<p>Natural England identified the following main issues in our relevant representations</p> <ul style="list-style-type: none"> • General HRA minor amendments, • Water quality and run off, • Night time construction working, • Noise disturbance, • Vibration, • Waterbird assemblage, • Wyre-Lune pMCZ, • Bird Mitigation Strategy, • Soils, including Best and Most Versatile (BMV) land, • Protected species – Great crested newts, • Protected species – Bats. 	Noted, no further response required.
REP2-071.2	<p>Since our previous relevant representation response, we have continued to engage with Highways England and their consultants and have seen amended versions of the following documents which we understand will be submitted at Deadline 2:</p> <ul style="list-style-type: none"> • Habitats Regulations Assessment (HRA) (Volume 5, May 2019, Rev 2) • Draft Pollution Control Plan (Volume 7, May 2019, Rev 1) • Record of Environmental Actions and Commitments (Volume 7, May 2019, Rev 1) <p>These amended documents have alleviated most of our concerns previously raised in our relevant representations – further details below.</p>	Noted, no further response required.
REP2-071.3	<p>The principal issues which have now been resolved</p> <p>General HRA minor amendments</p> <p>In our relevant representation, we advised on minor amendments which needed to be made to the HRA to add, amend or clarify parts of the assessment which were unacceptable.</p> <p>All additions, amendments and clarifications suggested have now been made to the amended HRA to Natural England’s satisfaction..</p>	Noted, no further response required.
REP2-071.4	<p>Water Quality and Run Off</p> <p>We advised previously (in our relevant representations, paragraph 5.2.1) that we agreed with the conclusion of the appropriate assessment - that mitigation measures are required for water run-off however, there were no details submitted of the proposed mitigation.</p> <p>Highways England amended the Habitats Regulations Assessment (HRA) (Volume 5, May 2019, Rev 2), to include further details about what mitigation is being proposed to address any water quality issues which may arise.</p> <p>A Draft Pollution Control Plan (Volume 7, May 2019, Rev 1) has also been submitted</p>	Noted, no further response required.

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	<p>which includes all the proposed mitigation measures. Natural England therefore agrees with the conclusion of the HRA that with mitigation in place, there will be no adverse effects on the integrity of European sites due to a change in water quality as a result of construction works and run off.</p>	
REP2-071.5	<p>Night Time Construction Working Natural England required more information and clarity on the proposed night time construction working arrangements to ensure that it will not have any negative impact on the proposed bird mitigation area. Additional text clarifying the proposed arrangements, in both the HRA and the REAC have addressed our concerns. We are therefore satisfied that the proposed night time construction working will have no adverse effects on the integrity of European sites.</p>	Noted, no further response required.
REP2-071.6	<p>Noise Disturbance In our relevant representations (section 5.4) we noted that the HRA acknowledges that there is potential for noise impacts throughout the construction period but gives no information or summary of where the greatest risk may occur, and we considered that this part of the HRA needed to be re-assessed. Highways England have revisited the HRA and have included additional reasoning around noise disturbance and the requirement for the proposed bird mitigation area (see Habitats Regulations Assessment (HRA) (Volume 5, May 2019, Rev 2)). Natural England therefore agrees with the conclusion of the HRA, that in considering the 'worst case scenario', mitigation is required and with the bird mitigation area in place, there will be no adverse effects on the integrity of European sites due to a noise disturbance during construction. However we have yet to see a final version of this strategy and therefore cannot yet be fully satisfied that the mitigation is appropriate. See paragraphs 3.12 onwards regarding the bird mitigation strategy.</p>	Noted, an updated Bird Mitigation Strategy will be provided following further discussions with the Duchy of Lancaster and the landowner/tenant.
REP2-071.7	<p>Vibration We stated in our relevant representations that impacts from vibration need to form part of the HRA. An assessment has now been made and included within paragraphs 7.4.38-7.4.42 of the HRA (Volume 5, May 2019, Rev 2) and Natural England are satisfied with the assessment made and agree with the conclusion that, with the bird mitigation area in place, there will be no adverse effect on the integrity of European sites</p>	Noted, no further response required.
REP2-071.8	<p>Waterbird Assemblage We previously advised that full consideration had not been given of the impacts of the project on the waterbird assemblage associated with the European designated sites. Highways England have amended their HRA (Volume 5, May 2019, Rev 2), to include reference to the waterbird assemblages and therefore Natural England is satisfied that full consideration has been given to the waterbird assemblages</p>	Noted, no further response required.
REP2-071.9	<p>Impacts on Wyre-Lune pMCZ We previously noted the inclusion of paragraph 8.5.7 in the Environmental Statement</p>	Noted. The Environmental Statement Changes and Correction Document (document reference TR010035/APP/7.11) notes the status change to the MCZ and concluded that this change

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	<p>(Chapter 8 Biodiversity) identifying the Wyre-Lune recommended Marine Conservation Zone (rMCZ) as being partially within the draft order limits however, the MCZ is now a proposed MCZ (pMCZ) since 8 June 2018 and therefore must now be treated as a material consideration for all proposals.</p> <p>Therefore, the Environmental Statement should now be updated to reflect the current position of the pMCZ We also previously advised that, in accordance with Section 126 of the Marine and Coastal Access Act (MCAA) (2009), an MCZ assessment should also be completed to fully assess the impact of the project on the pMCZ and to allow the DCO to grant a Deemed Marine Licence.</p> <p>The Environmental Statement Chapter 8 Biodiversity should also be updated with the conclusions from the MCZ assessment.</p> <p>We have spoken with the Marine Management Organisation (MMO) and understand that a Marine Conservation Zone Screening assessment has now been submitted to them for comment. We also understand that the MMO have agreed with the conclusions of the MCZ assessment in principle.</p> <p>The MMO sent us a copy of the Marine Conservation Zone Screening assessment (ref.HE548643-ARC-EGN-A585-RP-LE-4010, version V1.0, April 2019), and having read this, Natural England agrees with the conclusions of the assessment that with appropriate mitigation as identified in the assessment, there will be no significant adverse effects on smelt.</p>	<p>would not affect the assessment within Environmental Statement Chapter 8: Biodiversity (document reference TR010035/APP.6.8). Both the ES and the MCZ Screening Assessment concluded no significant affects. Further, the REAC submitted at Deadline 2 was updated with regards to the mitigation measures within the MCZ Screening Assessment.</p>
REP2-071.10	<p>Soils, including Best and Most Versatile (BMV) Land</p> <p>In our relevant representations, we stated that we were concerned that that project will result in a temporary loss of 46.81ha and a permanent loss of 44ha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system) and that there was no direct mitigation proposed for this loss.</p> <p>Highways England have clarified that a commitment to undertake soil surveys is included within the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3) which is secured by Requirement 4 of the Draft DCO (document reference TR010035/APP/3.1).</p> <p>Highways England also confirmed that a draft Soil Management Plan (SMP) has been written and appended to the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2) which outlines that a pre-construction soil survey would be undertaken to inform the final version of the SMP which will be developed by the contractor. This is also reflected in commitment 6G within the REAC.</p> <p>Therefore, Natural England is satisfied with the measures proposed.</p>	<p>Noted, no further response required.</p>
REP2-071.11	<p>The principal issues which are still outstanding</p> <p>We present below, the matters which are still outstanding and require attention, which are;</p> <ul style="list-style-type: none"> • Proposed bird mitigation strategy, • Protected species – bats and great crested newts. 	<p>Noted, please refer to REP2-071.6 and REP2-071.13 for Bird Mitigation Strategy and protected species, respectively.</p>

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REP2-071.12	<p>Proposed bird mitigation strategy (Outline CEMP, Appendix B)</p> <p>As already explained in our relevant representation, part of the pre-application process, we have exchanged several emails regarding the detail of the strategy. Natural England has also previously seen and commented on one completed, previous version of the mitigation strategy (comments made 14.11.18). There is still an agreed, outstanding matter to be resolved concerning Highways England obtaining the shooting rights around the mitigation area for the duration of the construction period.</p> <p>After reviewing the submitted strategy we are concerned that the reference to removing the shooting rights from the foreshore as well as from the surrounding fields has been removed from the submission version.</p> <p>The strategy should be amended to clarify that, in order for the mitigation site to be effective, all the shooting rights from the surrounding fields and the foreshore will be removed for the duration of the construction works to ensure that there is no adverse effect on integrity of the designated sites.</p> <p>Natural England would also like to review the amended strategy once it becomes available to ensure that it fulfils the HRA mitigation requirement and we can then agree with the HRA conclusion, that with the mitigation in place, there will be no adverse effects on the integrity of Morecambe Bay and Duddon Estuary SPA and Morecambe Bay Ramsar site.</p>	<p>Noted, please refer to REP2-071.6.</p>
REP2-071.13	<p>Protected Species</p> <p>As part of the pre-application process, Natural England have been in discussions regarding protected species and licencing. We made a number of comments and suggestions where further information and analysis needed to be made.</p> <p>Highways England have submitted information to our Pre-Screening Service (PSS) for a draft licence for great crested newts and bats (various species).</p> <p>There are a number of issues connected with the potential impact of the proposed development on European Protected Species. Natural England is not yet satisfied with the level of information provided regarding protected species / licencing for bats (various species) and great crested newts. Work is currently ongoing with Highways England to rectify this.</p>	<p>Please refer to the Applicant's comments at ExQ-1.3.2 and ExQ-1.3.3 of Comments on Responses to the ExA's Written Questions (document reference TR010035/APP/7.20).</p>
REP2-071.14	<p>Bats</p> <p>Since our relevant representation response, we have been in further discussions with Highways England regarding the bat licence.</p> <p>There is still an outstanding query regarding the survey results at Skippool Bridge in relation to the potential for the bridge which has been resolved at the meeting on 16 May 2019.</p> <p>As a result of conversations at this meeting, we are recommending that a further, pre-demolition endoscope survey is undertaken for structure ref B5 Skippool Bridge, to ensure that there are no bats using the structure before it is demolished. We also recommend that a Requirement is added to the DCO to reflect this – see paragraph 3.14.7 below.</p>	<p>Please refer to the Applicant's comments at ExQ-1.3.2 and ExQ-1.3.3 of Comments on Responses to the ExA's Written Questions (document reference TR010035/APP/7.20).</p>

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	<p>Following the meeting on 16 May 2019, and notwithstanding the additional mitigation measure required for structure B5 (Skippool Bridge), Natural England expects to be in a position to issue a letter of no impediment by 10 June 2019 for all structures. We will provide an update the Inspector once this matter has been resolved and the letter of no impediment for bats has been issued.</p>	
<p>REP2-071.15</p>	<p><u>Great crested newts</u> Following our comments in our relevant representation response, the information which has been submitted as part of the draft licence remains inconsistent, un-clear and is in-adequate to assess what habitat is being lost and what habitat is being provided as compensation. Natural England is still unable to confirm whether the compensation proposed is sufficient to offset the impacts (permanent and temporary losses) when used in conjunction with Licencing Policy 1. Following a meeting between Natural England and Highways England's ecologists (Arcadis), it has been agreed that Arcadis will provide updated licensable figures, impact and compensation tables by 24 May 2019 to enable Natural England to fully assess the impacts and determine whether sufficient compensation has been provided to warrant the use of Licensing Policy 1. It is anticipated that on receipt and assessment of the amended licensable figures and method statement tables that a letter of no impediment will be forthcoming. We will update the Inspector once this matter has been resolved and the letter of no impediment for GCN has been issued. However, if following amended figures and tables, there are still outstanding concerns, we will continue to work with Highways England to resolve these. As previously stated in our relevant representation response, this may also necessitate alterations to the Environmental Statement Chapter 8 Biodiversity.</p>	<p>Please refer to the Applicant's comments at ExQ-1.3.2 and ExQ-1.3.3 of Comments on Responses to the ExA's Written Questions (document reference TR010035/APP/7.20).</p>
<p>REP2-071.16</p>	<p>Matters that must be secured by requirements in the Development Consent Order (DCO) Some of these issues were raised as part of our relevant representation response, and some have been recently included. All are repeated here for clarity. The implementation of the Bird Mitigation Strategy should be secured via the DCO. This is a key mitigation measure to prevent an adverse impact on the integrity of the designated sites. The writing, approval and implementation of all other strategies which form part of the Outline CEMP should also be secured through a Requirement in the DCO. European Protected Species (namely bats and great crested newt): The relevant surveys and resulting licensed mitigation measures addressed through the license application process will need to be integrated into the scheme's wider habitat related measures and secured by a suitably worded requirement. Details of any mitigation and management measures will need to be captured in the scheme design drawing shown on the works plans and any management contracts agreed. As mentioned in section 5.9 of our relevant representations letter, a Requirement</p>	<p>Requirement 4 of the draft DCO (document reference TR010035/APP/3.1) secures the submission and approval of a Bird Mitigation Strategy as part of the CEMP.</p> <p>With regards to ALC survey, the need for this survey is secured through commitment reference 6G of the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3 – rev 1) which is itself secured through requirement 4 of the draft DCO (document reference TR010035/APP/3.1 – rev 2).</p> <p><u>Soil Mitigation Plan</u> Requirement 4 of the draft DCO (document reference TR010035/APP/3.1 – rev 2) already includes a requirement for a Soil Management Plan</p> <p><u>Bats</u> An additional requirement will be included within the REAC (document reference TR010035/APP/7.3) regarding the need for endoscopic survey immediately prior to demolition of Skippool Bridge.</p>

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	<p>should be added under Schedule 2, for an ALC survey to be undertaken prior to construction works commencing and that survey should be submitted to Natural England for comment before the Requirement is discharged.</p> <p>An additional Requirement should be added under Schedule 2 for the creation of a soil mitigation plan (as per the National Policy Statement for National Networks paragraph 5.179). This should be produced following the completion of the ALC and soil surveys and submitted to Natural England for comment before the Requirement is discharged. If found acceptable, the project should proceed in accordance with the approved mitigation.</p> <p>An additional Requirement should be added to require an endoscope survey of Skippool Bridge (B5) prior to demolition (when bats are likely to be active). This survey would comprise (as a minimum), an endoscope survey of all the features having some potential to be used by bats, more likely in an opportunistic manner. If the results of the survey show bats are present and a protected species licence is required, mitigation and compensation measures will also be required.</p> <p>Night time working – A Requirement should be added to clarify the currently agreed arrangements for night time working and should any additional night time working be required throughout the winter period (1 October to 31 March inclusive), this should only be carried out with full, prior agreement with the LPA and Natural England.</p>	<p><u>Night-time Working</u></p> <p>Commitment reference 4AL of the REAC (document reference TR010035/APP/7.3 – rev 1) secures the need to seek agreement with the LPA and Natural England in the event of any additional night-time working being required throughout winter period. The Outline CEMP (document reference TR010035/APP/7.2) will further regulate night-time working</p>
<p>REP2-071.17</p>	<p>General comments on the draft DCO.</p> <p>We note that under Schedule 1, Authorised Development there is no Work No. for the creation of the Bird Mitigation Area.</p> <p>Under Schedule 2, Part 1, 4.(2)(c), perhaps the (agreed) restrictions for night time working could also be included here.</p> <p>Under Schedule 2, Part 1, 4.(2)(d), we consider that more detail is needed, in particular, for the plans which haven't yet been written eg:</p> <ul style="list-style-type: none"> • When each plan should be finalised, and agreed before, • Details around what the plan should contain (could include some of the detail included in the REAC), • Details of any additional requirements as a result of the plan ie. consultation with Natural England to agree management strategy. <p>We note the commitment to producing a Soil Resource Plan as part of the Outline CEMP, which is already included in the Draft DCO under Schedule 2, Part 1, 4.(2)(d), however as already mentioned above in section 5.9 of this letter, more detail should be included within the Requirement to say that the Plan should be written prior to construction and submitted to Natural England for comment before the Requirement is discharged.</p> <p>Requirement 7 Protected species:</p> <p>Natural England is satisfied with the content of Requirement 7. Reflecting the discretionary nature of the consultation by the Secretary of State, we advise that the wording of Requirement 7(4) is amended to read:</p> <p><i>The relevant works under sub-paragraph (2) must be carried out in accordance with</i></p>	<p>The works to create the Bird Mitigation Area are considered ancillary to the main development and as such are not described as a separate work but rather are considered to be included as further development (i) in Schedule 1 of the draft DCO (document reference TR010035/APP/3.1 – rev 2).</p> <p>Night-time working – see response REP2-071.16 above.</p> <p>[Plans secured by requirement 4 of the draft DCO (document reference TR010035/APP/3.1 – rev 2) will form part of the CEMP. It is anticipated that there will be further discussion regarding the form of those plans. To the extent that further detail is required at this stage, the Applicant is willing to undertake further dialogue with Natural England about the content of the same].</p> <p>In response to ExQ 1.2.21 in Responses to the Examining Authority's Written Questions (document reference TR010035/APP/7.10), requirement 7 was amended at deadline 2.</p>

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	<i>the approved scheme, unless otherwise agreed by the Secretary of State who may consult with Natural England, and under any necessary licences.</i>	
REP2-072	Marine Management Organisation	
REP2-072.1	The MMO submitted a Relevant Representation in response to section 56 of the Planning Act 2008 (as amended) on 04 April 2019. As part of this Relevant Representation, detailed comments were provided regarding amendments to the draft DML wording and requirement for additional conditions. The applicant has updated the DML wording accordingly, taking into account the amendments suggested by the MMO. This was discussed and confirmed via telecon in February 2019.	Noted, no further response required.
REP2-072.2	Following further review of the draft DML provided to the MMO in advance of it's submission under Deadline 2. The MMO anticipate further engagement will be required with the Applicant over the contents of the draft DML. Specifically regarding: 2.2.1 Removal of Part 2 (b) or clarification within the DML of what activities this encompasses in relation to the project. 2.2.2 Definition of work schedule 1 works. No115 under part 1 2.2.3 Review of coordinates contained within the DML.	The Applicant believes these have now been addressed following the update to the dDCO (document reference TR010035/APP/3.1) submitted at Deadline 2
REP2-072.3	The Applicant submitted a Marine Conservation Zone Assessment to the MMO on 26 April 2019. The MMO has indicated its agreement with the Applicant over the approach and conclusions of the assessment but ultimately would defer its opinion to that of Natural England as the Statutory Nature Conservation Body.	Noted, no further response required.
REP2-072.4	At this stage the MMO considers matters in relation to the ES, HRA, MCZ & WFD assessments as agreed with the applicant. The MMO considers further amendments are required to be agreed with respect to the content of the draft DML. The MMO welcomes further engagement with the Applicant on this.	Noted, no further response required.
REP2-072.5	The MMO reserves the right to modify its present advice or opinion in view of any additional matters or information that may come to our attention.	Noted, no further response required.
REP2-073	Singleton Hall Management Company	
REP2-073.1	The representations are made following receipt and consideration of emails sent to Kenneth Carter (Director of the Company) by Highways England and Arcadis and with reference to the plan entitled A585 Windy Harbour to Skippool Improvement Scheme proposed access to Singleton Hall submitted to Mr Carter.	Noted, no further response required.
REP2-073.2	1. Please confirm that the ownership of the new access road will be transferred to Singleton Hall Management Company Ltd free of any restrictions, liability, conditions other than those presently on the current road. Please also confirm there will be no new rights granted or reserved along the road to parties who do not presently have such a right.	Refer to 28.2 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.3	2. At the eastern end of the proposed new access track to Singleton Hall on the northern boundary of the access track, there is a gate shown which would give access to land which lies within the order area. Is it the intention that Highways	Refer to 28.3 in Comments on Relevant Representations (document reference TR010035/APP/7.9).

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	England will have an access point at that position to land included in the order area? If so, the Management Company would wish to object to this as the current access track is a private residential access track for use by Singleton Hall, Singleton Manor and the Coach House.	
REP2-073.4	3. The fencing to the north side of the new access track shows a verge and then a safety fence behind which there would be proposed linear planting (hedge) and then proposed environmental barrier (fence). Behind that will be the retaining wall. There is no description given of the nature of the safety fence and the company is concerned that the nature of this may be detrimental to the approach to the hall and affect its setting. Please give a specification for this and the Management Company reserves the right to pursue an objection to this if the specification is not acceptable.	Refer to 28.4 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.5	4. We also note that a hedge will be planted behind the safety barrier and we note that the Management Company will be expected to maintain this and would be pleased if you could now give an indication of what access provisions there will be for the Management Company in respect of this.	Refer to 28.5 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.6	5. We also note that there is the environmental barrier behind the hedge and we assume that this is something that Highways England will maintain but have had no confirmation and would be pleased to receive confirmation of the same together with a specification for the barrier.	Refer to 28.6 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.7	6. To the south of the new access track we have noted the planting which is to be amended from that shown on the plan and would be pleased to receive the plan showing the amended planting to enable a comprehensive response. We also note that a hedge will be planted behind which there is the proposed estate fencing.	Refer to 28.7 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.8	7. The current access to the hall and the setting of the hall is such that the current access road has estate type fencing on both sides but it would appear that the new proposal has it on one side only, and even then behind a hedge. We would respectfully suggest that this will affect the setting of the Hall together with that of the Manor and Coach House. There is no indication given of the type of hedges which are to be planted adjacent to the access track. Please forward that information.	Refer to 28.8 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.9	8. We remain concerned regarding sight lines where the new access joins onto Lodge Lane and the plan provided which is to show sight lines of 4.5 metres by 120 metres shows the point to which the 4.5 metres is set back to one side of the access and not centrally located on it. The access is very close to the fencing/parapets of the Lodge Lane bridge and the plan would indicate there is no verge between the edge of the access track and the bridge fence/parapet. We believe that these issues need addressing to show whether appropriate sight lines are available. We also believe that there should be a gap between the edge of the access track and the bridge structure.	Refer to 28.9 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.10	9. The works identified within the application allow for the diversion of services for Singleton Manor but have made no provision for diversion of services for Singleton Hall. The Management Company require all mains services which we believe	Refer to 28.10 in Comments on Relevant Representations (document reference TR010035/APP/7.9).

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	currently come along the verge to the access road are diverted so that mains services are maintained at all times for the Hall.	
REP2-073.11	10. We have also found no provision for the diversion of the outfall pipe from the current treatment plant at the hall which we believe will be severed by the construction of the road. Please provide details of HE proposals.	Refer to 28.11 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.12	11. There is no provision for noise attenuation from the new road as constructed for the benefit of the Hall and we request noise attenuation to be installed and look forward to discussing the same with HE.	Refer to 28.13 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.13	12. Please provide details for the specification of the track to include the height of the kerb as we are especially concerned regarding vehicles driving up onto the verge if 2 vehicles need to do so to pass. In addition we would suggest the installation of a blind spot mirror on the access track at the bend which will be created on the access track to assist with safety. We note the access is to be 5.5 metres wide but question whether this is wide enough for a HGV and a car to pass without difficulty. We request the installation of a passing place, say 10 metres long to allow for the provision of larger vehicles to pass. We request that the safety barrier is placed on HE land in a place where it has less visual impact and will not affect the setting and access to the hall.	Refer to 28.14 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.14	13. There is no detail or provision regarding the drainage of the access road which currently drains from the edge onto a grassed area. The installation of kerbs will mean this now needs a drainage system installing, otherwise there will be great danger from standing water, especially in cold weather when the road may become icy.	Refer to 28.15 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.15	14. Singleton Hall Management Company require the lighting to be by the installation of 3 new matching lights rather than an attempt to re-locate one existing light and find other similar lights.	Refer to 28.16 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.16	15. Singleton Hall Management Company require the stone gateway pillars which are a feature of the entrance to the Hall to be re-located at the new entrance. They request that this be agreed on the basis that they will arrange for their contractors to remove the stone gateway pillars prior to the scheme commencing for safekeeping pending completion of the new access and for re-siting once the new access has been built and for their costs to be reimbursed. They also require the installation of appropriate plaques and signage to indicate that this is a private road.	Refer to 28.17 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.17	16. Singleton Hall Management Company request confirmation that their reasonable Professional Fees in this matter will be met by the Acquiring Authority.	Refer to 28.18 in Comments on Relevant Representations (document reference TR010035/APP/7.9).
REP2-073.18	17. We reserve the right to make further representations	Noted, no further response required.
REP2-074	P Wilson and Company LLP on Behalf of Mr Garth & Mrs Helen Moreton	
REP2-074.1	My client's property, The Beeches, lies at the Eastern end of the proposed scheme. I attach at Appendix 1 to this written representation a plan showing the extent of my client's property that briefly comprises a substantial 4 bedroom detached house set in large grounds and with substantial outbuildings.	Noted, no further response required.
REP2-074.2	The proposed DCO, if confirmed, would acquire a substantial part of the frontage of	Noted, no further response required.

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	my client's property. I attach at Appendix 2 a relevant extract of the DCO plans showing the extent of the proposed land take.	
REP2-074.3	In my client's view (a view I share) the extent of the land take proposed is excessive; no mitigation measures have been proposed; the access and egress from my client's property is effectively impossible post construction of the proposed highway improvement and therefore their continued use and enjoyment of the property is not possible.	Refer to 1.1.2 (including Appendix A) of the Responses to the Examining Authority's Written Questions (document reference TR010035/APP/7.10).
REP2-074.4	What my clients request is that the DCO and the design of the scheme are so amended so as not to require the purchase of any of my client's property and to redesigned in such a way that an effective access to my client's property through their existing gateway is facilitated from the new highway.	<p>The proposed route was chosen as being the optimum alignment due to existing site constraints. The Applicant is unable to amend the design so that the Scheme has no effect on the property in question. Three corridors (online, northern and southern) were considered during the Applicant's Options Stage. A total of 9 options were considered and 8 were discounted for a variety of reasons including: insufficient capacity for future traffic growth, increase in amount of land take required, close proximity to the Ramsar site and Special Protection Areas potentially increasing Habitats Directive compliance risks, a decrease in potential air quality and noise benefits and the close proximity and greater impact on Main Dyke and associated flood zones.</p> <p>The options also considered included a roundabout alternative at Skippool Bridge Junction connecting the bypass with Mains Lane and, westwards, to Skippool Junction. That arrangement using the existing highway corridor to Skippool Junction required land from the front garden of The Beeches. At that time, this roundabout alternative was shown to have insufficient capacity for the predicted traffic flows and would have had to be substantially enlarged to cope that would have required even more land from The Beeches. Consequently, the currently proposed traffic signal junction was developed that has sufficient capacity to accommodate the predicted traffic flows</p>
REP2-077	Maria Cassidy	
REP2-077.1	<p>We are horrified at the details of the proposed plans for the Windy Harbour to Skippool Improvement Scheme.</p> <p>Our property is virtually next to the River Wyre roundabout and if this scheme goes ahead we will have 7 or 8 sets of traffic lights near our house. The road would be 15 metres nearer to the house and side garden which is already very narrow due to the compulsory purchase of 3/4 of the original garden when Amonderness Way was originally constructed in 1967.</p> <p>As both my husband and I this would be very detrimental to our health. It is a well known fact that idling traffic causes greater pollution and cars and lorries would be idling just alongside our house. Exhaust from idling vehicles would undoubtedly exacerbate our health problems forcing us to move home, a home which has been my husbands for 57yrs.</p> <p>This brings me to another problem, having been forced to move we would indeed find</p>	<p>At Skippool junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle of the traffic lights. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays.</p> <p>The existing Skippool junction has lighting columns leading up to the junction and at the junction itself. The Scheme will have a similar arrangement in terms of lighting.</p> <p>The new slip road/junction improvements would have a negligible effect on road traffic noise in this area due to these levels being mitigated to a minimum and below a level where significant adverse effects on health would occur through the use of low noise surfacing on both the new slip and across the proposed new junction alignment. No effects as a result of vibration are anticipated during operation. Please refer to Figures 11.5 and 11.6 in the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).</p> <p>Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6)</p>

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	<p>that the proposed changes have devalued our property. Who would want to buy a property surrounded by light pollution, noise pollution and air pollution?</p> <p>However if I thought this would alleviate the congestion and generally improve the road I would give it some consideration. This is not the case because far from improving the congestion it would only move it further along the road.</p>	<p>presents an assessment based on detailed air quality modelling which was undertaken for a number of worst-case receptor locations, including properties close to the Scheme. All predicted air quality concentrations at these locations were below the respective air quality objectives, and the assessment determined that the Scheme would not have a significant effect on local air quality.</p> <p>As defined in Highways England's Road Investment Strategy (RIS) 1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. The Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in the Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1) Section 2.9. In addition, the Highways England's Asset Renewal Programme is conducting investigatory studies for the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Highways England's Asset Renewal Programme schemes on the A585 Windy Harbour to Skippool Improvement Scheme which showed that when including the capacity improvement upgrades of adjacent potential Highways England's Asset Renewal Programme schemes along the A585 route it remained economically worthwhile (based on an assessment of Transport User Benefits only) to proceed with the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in Appendix F and H of the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12).</p>
REP2-077.2	I won't reiterate the excellent statement prepared by John Bailie but I agree with him entirely.	Refer to responses provided to REP2-056 above.
REP2-077.3	<p>This scheme would devastate the natural environment and cause untold harm for the future.</p> <p>Please, please consider these objections and reject this scheme.</p>	The Applicant has thoroughly assessed the Scheme impact on the environment and where appropriate measures will be implemented to mitigate harm. Please refer to the Environmental Statement Non-Technical Summary (document reference TR010035/APP/6.18) and Environmental Statement Summary Chapter (document reference TR010035/APP/6.17)
REP2-078	Stephen Cassidy	
REP2-078.1	<p>We have lived at on the corner of Skippool Road and Amounderness Way since 1988. The roundabout at Skippool Junction was built in 1974 to eliminate a dangerous staggered crossing over Amounderness Way from Skippool Road to Breck Road. The roundabout worked well eliminating this dangerous crossing.</p> <p>Over 30 yrs we have been seen an exponential increase in traffic up and down Amounderness Way, Breck Road and Skippool Road. During peak times the traffic build up is considerable, but the traffic does keep moving around the roundabout faster than if controlled by traffic lights as the junction will be. The tailbacks back down Mains Lane to the roundabout and up Amounderness Way are caused by the traffic lights as the "T" junction of Shard Road A588 and Mains Lane. This junction is about 300 metres up mains lane. I have witnessed these queues many times and am certain</p>	<p>We acknowledge that there has been an increase in traffic and one of the objectives of the Scheme is to ease congestion in the area between Skippool and Windy Harbour.</p> <p>As part of the Scheme, Shard Road junction will also be modified as a result of feedback from Statutory Consultation and operational modelling. The modification of the junction includes provision of dedicated turning lanes to reduce the build up of traffic at the junction.</p> <p>The current tailbacks along Amounderness Way are caused by a lack of capacity at Skippool junction and Norcross junction, noting that the existing link between the two junctions still has a residual capacity. The combination of modifying the existing Skippool junction arrangement into a signalised crossroad, and Highways England's Asset Renewal Programme improvements to</p>

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REP2-078.2	<p>the lights at the junction are the cause.</p> <p>The new road will eliminate these queues as it by-passes Mains Lane but changing the roundabout into a traffic light controlled junction will cause major tailbacks on all three road Amounderness Way, Skipool Road and Breck Road. The present five crossing points on these three roads for cyclists and pedestrians are quite adequate.</p> <p>The existing roundabout at Skippool Junction does cause queues but these will be small in comparison to those at a junction with 5 or 6 sets of lights even if controlled by computers for maximum effect.</p> <p>Please accept these conclusions as a result of observation and close proximation to the roundabout over a long time.</p>	<p>Norcross junction will alleviate congestion along Amounderness Way.</p> <p>Please refer to response in REP2-077.1</p> <p>During statutory consultation, there was a common theme that there were inadequate crossing points and support for the introduction of signals at pedestrian crossings, more details can be found in the Consultation Report (document reference TR010035/APP/5.1)</p>

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