

A585 Windy Harbour to Skippool Improvement Scheme

TR010035

7.19 Comments on Local Impact Reports

APFP Regulation 5(2)(q)

Planning Act 2008

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

Volume 7

May 2019

Page Left Intentionally Blank

Infrastructure Planning

Planning Act 2008

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

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

COMMENTS ON LOCAL IMPACT REPORTS

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010035
Application Document Reference	TR010035/APP/ 7.19
Author:	A585 Windy Harbour to Skippool Improvement Scheme Project Team, Highways England

Version	Date	Status of Version
Rev 0	May 2019	Deadline 3 Submission

Page Left Intentionally Blank

CONTENTS

1	COMMENTS ON LOCAL IMPACT REPORTS.....	1
----------	--	----------

LIST OF TABLES

	Table 1-1: Applicant's Responses to the Local Impact Reports (LiR)	2
--	--	---

Page Left Intentionally Blank

ABBREVIATIONS

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

Abbreviation	Meaning
Outline CEMP	Outline Construction Environmental Management Plan
DCO	Development Consent Order application
dDCO	Draft Development Consent Order
DMRB	Design Manual for Roads and Bridges
ES	Environmental Statement
FBC	Fylde Borough Council
FRA	Flood Risk Assessment
HER	Lancashire's Historic Environment Record
HGV	Heavy goods vehicle
LCC	Lancashire County Council
LiR	Local Impact Report
NIR	Noise Insulation Regulations
REAC	Record of Environmental Actions and Commitments
RR	Relevant Representation
SoCG	Statement of Common Ground
Stage 2	Options Selection
Stage 3	Preliminary Design
Toucan	An unsegregated signal-controlled crossing for pedestrians and cyclists, linking cycle track and footway systems on opposite sides of a carriageway and often forms part of a traffic signal-controlled junction

1 COMMENTS ON LOCAL IMPACT REPORTS

- 1.1.1 The Applicant has considered the Local Impact Reports (LiR) submitted by from the interested parties. The Applicant has also considered the further comments made by Fylde Borough Council in response to the Applicant's comments on its relevant representations. Insofar as it is necessary to respond to the same, the Applicant sets out its comments in response.
- 1.1.2 These can be found in Table 1-1 below.

Table 1-1: Applicant's Responses to the Local Impact Reports (LiR)

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
LIR-001	Lancashire County Council	
5	Relevant Planning Policies including policies of the Development Plan	
5.16	The county council notes that a number of the chapters of the Environmental Statement make reference to the Lancashire Structure Plan. The Examining Authority should note that the Lancashire Structure Plan no longer forms part of the adopted Development Plan for this area.	Removal of reference to the Lancashire Structure Plan will be noted within the next revision of the Environmental Statement Changes and Corrections Document (document reference TR010035/APP/7.11 – Rev 1). The removal of the reference to the Lancashire Structure Plan does not change the conclusions of the assessments presented in the Environmental Statement (document reference TR010035/APP/6.1- 6.16).
6	Commentary on Policy Context	
6.6	The proposed Windy Harbour to Skippool Improvement scheme subject to the Development Consent Order application would not address all of the issues on the A585 between the M55 junction and Skippool and therefore the benefits of the proposed scheme might be less than those that would be achieved through construction of the Blue Route. Notably the proposed scheme would not address any of the deficiencies on the current A585 between Windy Harbour and the M55.	As referenced in Highways England's Road Investment Strategy, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junctions to address congestion and safety concerns. The Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in Section 2.9 of the Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1). 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 Roads that are separate from the Scheme.
8.0	Air Quality Effects	
8.3	The Air Quality Directive sets out standards for air quality in terms of NOx emissions and requires Air Quality Management Areas to be established where there is a failure to reach the stated standards. Air Quality Management Areas are designated by borough councils where annual mean levels of NO ² exceed the national objective level of 40µg/m ³ . There is an Air Quality Management Area within the study area within Poulton le Fylde. Highways England have undertaken their own air quality monitoring close to Windy Harbour junction which indicated that NO ² concentrations were well below the national objective level. However, information submitted to the examination by Fylde Borough Council indicates that current NOx levels are very close to the EU objective level at Singleton Crossroads.	Fylde Borough Council states the following regarding the crossroads ' <i>FBC's own monitoring at the Five Lane Ends crossroads (since January 2017) indicates that current, mean NOx levels in this location are very close to the EU maximum of 40 mg/m3. The reduction in standing traffic arising from the development has the potential to significantly reduce this figure and, ultimately, prevent the future designation of an Air Quality Management Area (AQMA). Accordingly, the scheme has the potential to deliver positive impacts in terms of air quality.</i> '
8.7	In relation to dust emissions during construction, the main issue will be when construction works take place very close to existing properties. This will particularly relevant for certain properties in the Skippool area which are located very close to the proposed new road and those located off Lodge Lane where there will be considerable excavation and earthmoving required to create the proposed cutting. There is a risk of significant dust impacts at these properties if mitigation is not provided. However, it is considered that such impacts could be reduced to acceptable levels provided that mitigation is properly employed. Such measures should be detailed in a Construction Management Plan which should be the subject of a requirement forming part of any Development Consent Order for this scheme.	The Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) outlines a number of measures to mitigate dust impacts. The Record of Environmental Actions and Commitments is an appendix of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 1) which is secured by Requirement 4 in the draft Development Consent Order (document reference TR010035/APP/3.1).
9.0	Noise	
9.7	The county council as Highways Authority does have experience of using thin surfacing materials and has specified such materials for use on some of its own road building projects in order to reduce noise impacts. However, such materials	It is standard practice for Highways England to implement thin surfacing materials / low noise surfacing on all their new schemes. Reverting to hot rolled asphalt would not represent the final

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>are relatively new and there is some concern about their durability and long term maintenance costs when compared to hot rolled asphalt. Given these uncertainties, a more robust approach for the noise assessment might have been on the basis that conventional surfacing materials will be used in the event that these materials are eventually used on the road due to concerns about the maintenance costs of using modern thin surfacing materials. The noise assessment undertaken in 2016 for the county council's own Preston Western Distributor Road was conducted on this basis. The Examining Authority may therefore wish to consider requiring a reworking of the noise assessment based upon conventional surfacing materials being used. It is not clear from the Environmental Statement what correction factor has been used in the noise assessment to factor for the use of low noise surfacing materials.</p>	<p>constructed Scheme as the use of hot rolled asphalt would be a departure from Highways England's adopted standards. The commitment to implement thin surfacing materials / low noise surfacing is outlined within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3) which is an appendix to the Outline Construction Environmental Management Plan, secured by Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1).</p> <p>Further details of correction factors are provided at paragraph 1.9.2 of the Responses to the Examining Authority's Written Questions (document reference TR010035/APP/7.10).</p>
9.9	<p>In summary, using the applicant's methodology there are predicted to be 1716 dwellings where there would be some increase in road traffic noise. However, in terms of significant noise increase / decrease there are more properties (99) that would experience a decrease in noise above a 'Significant Observed Adverse Effect Level' than those that would experience a similar degree of noise increase (19). However, for those properties that are detrimentally impacted, it will be important to consider the significance of the impact and the design and impact of any mitigation measures.</p>	<p>The significance of noise impacts is summarized at Table 11-35 within the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11). All adverse noise impacts have been mitigated to a minimum in accordance with the National Networks National Policy Statement (Paragraph 195) and mitigation measures incorporated into the Scheme design consider the adverse impacts of the Scheme.</p>
9.10	<p>There is a property called Beeches located off Mains Lane immediately adjacent to the point where the new bypass meets with the existing A585. From the text of the Environmental Statement it appears that a decision has not yet been made whether to demolish this property. If this property is to be retained it is suggested that more noise mitigation needs to be provided than is shown on the Environmental Masterplan drawings as these drawing only show a narrow belt of woodland planting between the road and the property.</p>	<p>Environmental Statement Chapter 2: Description of the Scheme (document reference TR0100356/APP/6.2) assumes that the Beeches property would be demolished. However, a commitment will be provided within Revision 2 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) to state '<i>Should the design of the Scheme significantly differ from what was assessed within Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) noise mitigation would be reviewed, if necessary re-designed and consulted with the relevant local planning authority</i>'. This would include mitigation measures at the Beeches should this property not be demolished. The updated REAC will be issued in due course.</p>
9.10	<p>The proposed use of low noise surfacing materials is noted but the Examining Authority is requested to have regard to the county council's comment about such materials at paragraph 8.6 of this report.</p>	<p>Refer to the response to 9.7 above.</p>
9.10	<p>The only property that is likely to be eligible for noise insulation based upon</p>	<p>A response to this question can be found at paragraph 1.9.1 of the Responses to the Examining</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>the predicted Increase in noise levels is a property on Lodge Lane called North Lodge. It is not clear why this is the only property that would qualify for such measures given that there are a number of other properties in this area which are located at a similar distance to the proposed highway. North Lodge would also benefit from a 2 metre high noise fence. However, there is also another property located in this area (Larkfield) which does not appear to benefit from the same degree of noise protection. The reason why no mitigation is provided for Larkfield other than planting is not clear.</p>	<p>Authority's Written Questions (document reference TR010035/APP/7.10).</p>
9.11	<p>The Environmental Statement also assesses the impacts of construction noise. For certain properties very close to the route (such as those located off Mains Lane and Lodge Lane), these impacts are likely to be significant. However, in the main they would be relatively short term. Mitigation measures for such impacts would be required which would need to relate to controls on hours of operation and implementation of specific mitigation measures during certain operational activities. These could be secured through a Construction Environmental Management Plan.</p>	<p>Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) outlines that temporary construction noise (daytime levels and overnight levels) are unlikely to be significant based upon the guidance of BS 5228-1:2009+A1:2014. Construction noise and vibration will be controlled through a Construction Noise and Vibration Management Plan which will form part of the formal Construction Environmental Management Plan (CEMP) which is secured through Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1) and a Section 61 Consent. The CEMP and Construction Noise and Vibration Management Plan will be consulted with Fylde and Wyre Borough Councils Environmental Health Departments and a Section 61 Consent will be sought from Fylde and Wyre Borough Councils.</p>
10.0	<p>Landscape / Visual Impacts</p>	
10.2	<p>The route of the scheme has been selected to reduce its visual and landscape impacts to a minimum. It does not impact upon any landscapes of national (Area of Outstanding Natural Beauty) or local importance. However, it would still be a major new highway running through an area of predominately undeveloped countryside and would therefore have a significant visual impact, requiring removal of existing landscape features such as hedgerows, trees (some of which are covered by Tree Preservation Orders) and construction of significant cuttings and embankments. There are also a large number of residential properties that have views over the alignment of the proposed road where there would be visual impacts to a greater or lesser degree.</p>	<p>Landscape and visual impacts have been considered within Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9).</p>
10.3	<p>The main landscape impact of the scheme would be the section of new road between Skippool Bridge junction in the west and the junction with the existing A585 in the east. This is the section of the new road that would run through the existing open countryside. The section between the Skippool Bridge Junction and Lodge Lane is characterised by a number of large agricultural fields divided by low hedgerows. The landscape in this area is predominantly flat with few major features such as mature trees or woodlands. It is considered that the contours of the landscape would limit the longer distant views of the proposed road. However, much of this section of the highway would be on significant embankment, especially the section parallel to the Main Dyke. The embankment would be a significant feature and would represent a major adverse change to the existing landscape. It is accepted that this section of road needs to be raised above flood level but it is not clear why this section of the road needs to be raised on such a significant embankment other than it would permit the road to be constructed without requiring significant off-site disposal of surplus excavated material. This part of the scheme would also have a significant visual impact when seen from properties on the south side of Mains Lane and also the new houses currently</p>	<p>Landscape and visual impacts have been considered within Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9).</p> <p>The design has been developed in accordance with DMRB standards TD9/93 and TD27/05. The vertical alignment through section +780 to +2110 is constrained by two aspects; the flood zone area and the fixed position of the at grade junctions (Skippool Bridge and Poulton), tying into the existing roads. Overall whilst the Scheme is utilising site material for the construction of earthworks, the Scheme has a cut/fill deficit of approximately 225,000 cubic metres of general fill material and approximately 100,000 cubic metres of granular fill material. The design and associated landscape mitigation is presented in more detail within the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19)</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	being constructed off Garstang Road East northwards towards the scheme. These impacts would be partially mitigated by the use of false cuttings and landscaping on the external faces of the embankment but it would take several years for the landscaping to mature to a condition where the mitigation is effective.	
10.4	For the section from Lodge Lane eastwards, the main landscape impacts relate to the proposed cutting and the removal of various plantations and trees to the north of Singleton Hall to construct the road through this area. The works through this area would have a major visual impact although the county council accepts that the routing options through this area are limited and the option selected is that which minimises the loss of vegetation and visual impact and avoid the need to demolish existing properties. To reduce the impacts through this area, retaining walls are used to support the sides of the cutting in order to reduce land take and loss of existing vegetation. Even with such mitigation measures, the scheme would still result in the loss of woodland in this area, some of which is protected by tree preservation order and which forms part of the parkland type landscape surrounding Singleton Hall.	Landscape and visual impacts have been considered within the Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9). Throughout the development of the Scheme, the Applicant has sought to minimize the loss of existing woodland and vegetation. Where such loss is unavoidable, the Applicant has sought to mitigate the impact and this is reflected in the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19).
10.5	Adjacent to the Lodge Lane crossing are a number of individual residential properties (Larkfield, North Lodge and The Manor together with Barnfield Manor which has been divided into a number of units). All of these properties are located very close to the road alignment (around 30 metres from the cutting in the case of North Lodge). In the case of The Manor and Barnfield Manor it is considered that the route and design of the scheme is such that the visual impact on the properties are minimised as most of the existing vegetation on their northern side is retained thereby retaining their existing setting. New landscaping is proposed to offset the impact of the 2 metre high noise attenuation fencing that is proposed to mitigate noise impacts to these properties. However, it is considered that a continuous hedgerow might be more effective in time to screen the fence than the line of trees that appears to be proposed. For the two properties to the north of the Lodge Lane crossing (Larkfield and North Lodge), some of the existing vegetation to the south of these properties will need to be removed. Some will be retained but particularly in the case of North Lodge, it is considered that there will be a significant impact on the visual amenity and setting of this property. The applicant has prepared photomontage information of this area looking north along Lodge Lane but due to the potential impacts in this area, it is considered that it would have also have been useful to provide information showing the view southwards from North Lodge towards the new bridge.	<p>Landscape and visual impacts have been considered within the Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9).</p> <p>The mitigation measures proposed adjacent to the new access road to the Manor will be maintained by the Singleton Hall Management Company and are identified on the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1). The measures will comprise linear planting (asset 009-17) on the northern side of the access road maintained to achieve a height of between 3-4 metres which over time will provide an effective screening element, and linear planting (asset 009-14) on the southern side which will be maintained to a max height of 1 metre with specimen avenue tree planting (asset 009-13) with a clear stem of 2 metres to allow for visibility. The Landscape Elements for asset 009-14 and 009-17 are stated as LE2.4 Linear Belts of Shrubs and Trees, and in this location, it is proposed that these will be maintained as a hedgerow feature.</p> <p>With reference to the additional photomontage comment, all representative viewpoints and photomontage locations were agreed with both Wyre and Fylde Borough Councils. Photomontages are a tool used to help inform the assessment and have been selected from a number of the representative viewpoints.</p> <p>From the northern end of the bridge (as represented by North Lodge) effects from this residential visual receptor (V-R-24-1) have been assessed as significant during construction and operation (both opening and design year). Preparing an additional montage from this location would not change the conclusions of the assessment.</p>
10.8	The other main landscape impact associated with the eastern end of the scheme relates to the proposal for carrying an existing footpath over the new road. The applicant has included a photomontage of the proposed bridge which would be a large steelwork structure with separate access ramps and staircases which add to its visual impact. The county council considers that the design of this structure is	<p>A response was given to this question within RR-009 (9.3) in the Comments on Relevant Representations (document reference TR010035/APP/7.9).</p> <p>The design of Grange Footbridge is a steel truss footbridge and is a cost effective, visually permeable structure. The design allows for the main span to be entirely fabricated off site and</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>not particularly satisfactory in this rural setting and should be revisited. In particular it should be investigated whether there is scope to divert the footpath alongside the road to the west to where the footpath could cross the proposed cutting via a more simple bridge structure or if an underpass under the new road would be possible. Alternatively, it might be possible to provide some retaining walls against the sides of the new road to form the abutments of the bridge. Planted embankments could then be formed against the retaining walls to provide a structure more in keeping with this rural location.</p>	<p>erected in one-piece minimising on site activities.</p> <p>Woodland planting for screening purposes adjacent to the Grange Footbridge structure has been included where physical space requirements allow. In addition, supplementary linear hedgerows with occasional trees are also included to integrate with the adjacent landscape features. Planting is presented on the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1).</p> <p>An additional commitment has been included within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) to increase the planting stock size and include a greater percentage of evergreen varieties to provide increased screening all year round and also from the Opening Year, specifically within woodland planting plots 011-05, 011-07, and 011-12 of the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1).</p> <p>Diverting the footpath westwards to the start of the cutting east of Lodge Lane would result in an additional distance of about 1.3km which would reduce the amenity of the footpath. It would further put the alternative footbridge in close proximity to The Manor and the Ice House. The diverted footpath would be outside the highway boundary and would require additional third-party land beyond the current limits of the draft development consent order including affecting part of the woodland screening The Manor on the south side of the bypass.</p> <p>An alternative underpass at the existing footpath location was considered during the preliminary design but was rejected due to the risk of flooding and the fact that underpasses are generally less popular than a footbridge.</p>
10.9	<p>At the western end of the new road beyond Skippool Bridge junction, the road improvement scheme would mainly be achieved within the boundaries of the existing A585 where the visual and landscape impacts would be significantly less than the locations further east. However, there would still be very significant visual impacts during the construction phase relating to the remodelling of the existing A585 / A588 roundabout to a traffic light controlled junction, the construction of the new bridge over the Main Dyke and the junction where the new road would meet the existing A585 on Mains Lane.</p>	<p>Temporary construction landscape and visual impacts have been considered within the Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9).</p>
10.10	<p>To conclude on landscape issues, the proposed highway would have major visual and landscape impacts during construction which would only be partially mitigated by landscaping works. The residual impacts would be particularly marked in the Lodge Lane area and are a significant negative impact of the scheme that needs to be considered alongside any benefits that the road would deliver.</p>	<p>Landscaping mitigation measures shown on the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/7.19 – Rev 1) relate to the operational Scheme only. Construction mitigation measures are outlined within the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 1). The landscape mitigation measures outlined in the Environmental Masterplan will reduce significant negative effects at the Lodge Lane area over time (refer to the Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9)).</p>
11.0	<p>Ecology / Biodiversity</p>	
11.4	<p>The methods and surveys that have been used to establish the ecological value of the application site are considered to be generally acceptable. However there does not appear to be any attempt to quantify the value of the trees that would be removed beyond an assessment of whether they are covered by tree preservation orders. It is considered that some assessment should be made as to whether any</p>	<p>Table 3 National Networks National Policy Statement in Chapter 5 (Row 5.32) of the Planning Statement and National Policy Accordance (document reference TR010035/APP/7.1) states '<i>The Scheme would not affect any Ancient Woodland or veteran trees</i>'.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	of the trees to be removed would fall within the 'veteran or ancient' categories referred to in paragraph 175 c) of the National Planning Policy Framework.	
11.6	The proposals include mitigation measures for the above impacts. These include new woodland planting along both sides of the dual carriageway, replacement of the hedgerows temporarily removed during construction and new hedgerow planting alongside the road for those hedgerows that would be permanently lost. Whilst a greater amount of new hedgerow and tree plant would be provided compared to that removed, it is not considered that this necessarily translates to an overall ecological gain especially when the new planting would be mainly alongside a dual carriageway where disturbance impacts would be much greater.	The Scheme demonstrates a biodiversity net gain within Appendix 8.9: Biodiversity Metric Calculations of the Environment Statement (Document Number TR010035/APP/6.8.9).
11.8	The scheme would result in the loss of two confirmed bat roosts. The Examining Authority should therefore assure itself that the tests in the Habitats Regulations are satisfied in relation to the impacts on this particular European Protected Species. In particular there seems to be limited information within section 8.6 of the ecology chapter of the Environmental Statement to demonstrate that the intended mitigation measures for the impacts on bats would be in a suitable location and of suitable design to provide sufficient mitigation for the roosting habitat that would be lost to the scheme. If development consent is granted for the scheme, it should be subject to a requirement dealing with the provision and design of the mitigation measures for bats.	The Applicant has consulted with Natural England on its draft European Protected Species Licence and Natural England is satisfied with the mitigation provided. A Letter of No Impediment will be provided in due course.
11.14	Habitats Regulations Assessments are required to take into account other projects or plans to assess if there might be 'in combination' impacts with the proposed development. The list of projects within Appendix 16.1 of the Environmental Statement includes the Preesall Underground Gas Storage Scheme which was granted Development Consent in July 2015 and which is indicated as being within the cumulative impact assessment due to falling within multiple zones of influence. However, this project does not appear to be included within the list of 'in combination' projects within the Habitats Risk Assessment.	The Preesall Underground Gas Storage Scheme was not identified to be within the zone of influence for biodiversity (refer to Table 16.4 in Environmental Statement Chapter 16: Cumulative Effects (document reference TR010035/APP/6.16)). It has also already undergone its own Habitats Regulations Assessment which concluded that with mitigation in place there would be no residual effects on European sites and therefore no in combination effects would occur.
11.15	The Appropriate Assessment concludes that there would be adverse impacts on certain over wintering bird species for which the Special Protection Area is designated. The Assessment indicates that the adverse impacts would mainly be by way of disturbance, particularly during construction works and with a much more limited effect during the operational phase once the noise mitigation and landscaping works become effective. To address impacts during construction, the applicant proposes to establish an ecological mitigation area covering 16.4 ha of agricultural fields to the north of the existing A585. Various management controls would exist on this area over the construction phase so that its value for the relevant bird species is maximised to compensate for that lost to the scheme itself. The Appropriate Assessment concludes that with the mitigation, the proposed development would not prevent the Morecambe Bay and Duddon Estuary Special Protection Area from fulfilling its conservation objectives. The county council generally agrees with the conclusions of the assessment. However, the landscaping alongside the road will take some time to mature to a stage where it provides effective screening for the disturbance impacts of the scheme and a restriction of the management timescale to the duration of construction may not be sufficient to provide adequate compensation. Therefore the Examining Authority should satisfy itself that the management timescale proposed for the mitigation area is appropriate and would be effective. The details of the management works	Whilst the landscaping works will have a beneficial effect on birds in terms of reducing disturbance on the surrounding habitats in the long-term, it is not required to mitigate for operational effects on birds. The Habitats Regulations Assessment (document reference TR010035/APP/5.4 – Rev 2) concluded that there would be no adverse operational effects as a result of the Scheme and this has been agreed with Natural England. The mitigation area referred to is only required during the construction phase and management of this area for the duration of the construction period is provided for within the Bird Mitigation Strategy within the Outline Construction and Environmental Management Plan (see Appendix B of document reference TR010035/APP/7.2).

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	should be the subject of appropriately worded requirements within any Development Consent Order for the scheme or legal agreement.	
12.0	Historic Environment	
12.2	Within the draft order limits are two designated cultural heritage assets at Singleton Hall Ice House (60 metres south of the scheme) and Singleton Village conservation area (775 metres south of the scheme). There are no scheduled monuments, world heritage sites, registered battlefields or registered parks and gardens within the draft order limits. There are a further 36 non designated archaeological remains within the order limits, the majority of which are post medieval and of unknown date.	The Grade II listed Ice House at Singleton Hall and Singleton Conservation Area are not located within the draft order limits.
12.3	The county council considers that the overall approach of the assessment is acceptable. However, it is relevant to point out that some additional archaeological fieldwork in this area has been carried out since the archaeological assessment for the A585 was completed. Fieldwork carried out on a housing development in the Little Poulton area which impacts upon the Romano – British settlement (sites 112 and 193 in the gazetteer) has shown that it is more extensive than previously suspected. The work has also revealed that previous geophysical work has not identified all the elements of the site that have subsequently been revealed by ground excavations. Similar issues have been experienced elsewhere in Lancashire. This means that the findings of the geophysical investigation that has been undertaken for the A585 project are brought into some doubt and strengthens the case for the 'blank areas' with the geophysical survey to be subject to trial excavation prior to main earthworks. It should also be noted that site 12 (possible watermill at Skippool) has been subject to some further desk based assessment and its location now appears to be within the Development Consent Order corridor rather than outside it.	<p>The Advanced Archaeological Works Project Design (March 2019) was accepted by the Archaeological Advisor to Lancashire County Council and was designed to place trenches in 'blank areas', to test the overall archaeological potential of the Scheme through excavation and the reliability of the geophysical survey results. This forms part of the continued phased approach to heritage and any features identified through excavation will be further targeted through mitigation.</p> <p>A revised Environmental Statement Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7 – Rev 1) was submitted at Deadline 2. The replacement Environmental Statement Chapter addressed comments received from the Archaeological Advisor to Lancashire County Council and accounted for the revised location of site 12 (possible watermill at Skippool) within the draft order limits. Appropriate mitigation has been proposed, which includes targeting the asset with a trial trench as an initial form of assessment.</p>
12.4	A number of issues were identified with the original scheme of mitigation relating to various sites along the alignment of the scheme. However, it is understood that these issues have now been addressed through further clarification of the scope and likely impact of the scheme. Provided that the updated scheme is subject to a requirement within any Development Consent Order and that the scheme makes provision for further recording should any assets be discovered as part of trial trenching, it is considered that the impact on historic environment assets is acceptable. The potential for impact on as yet unknown assets does not appear sufficient to require a redesign of the scheme or constitute a major objection to the scheme as a whole.	The archaeological mitigation for the Scheme has been agreed with the Archaeological Advisor to Lancashire County Council - see Statement of Common Ground with Wyre Borough Council (document reference TR010035/APP/8.4). The archaeological mitigation including the final Written Scheme of Investigation is secured by Requirement 9 of the draft Development Consent Order (document reference TR010035/APP/3.1).
14.0	Drainage and Flood Risk	
14.2	Section 14 of the National Planning Policy Framework deals with planning and flood risk. It states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (the sequential test). Where development is necessary within such areas, the development should only be permitted where it would provide wider sustainability benefits that outweigh the flood risk and that the development will be made safe for its lifetime without increasing flood risk elsewhere and where possible will reduce flood risk overall.	A Flood Risk Assessment (FRA) (document reference TR010035/APP/5.2 – Rev 1), has been prepared to assess flood risk to the Scheme and to quantify any impacts of the Scheme on flood risk to third party lands. The FRA has been informed by detailed modelling of rivers (Main Dyke/Horsebridge Dyke), tides and the interaction between the two. The FRA concludes that the Scheme is safe from flooding over its lifetime, apart from a small section local to the Skippool Junction. Here, there is a risk of flooding during an extreme tidal flood event. This cannot be avoided as the vertical alignment of the Scheme at this location is constrained by tying into the existing road network. Flood risk to the Scheme at this location would be managed by implementation of a Flood Warning and Evacuation Plan. A draft of this plan is appended to the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
		<p>– Rev 1).</p> <p>Once constructed, the Scheme contributes towards reducing flood risk from the Main Dyke and there is a beneficial or neutral impact on 245 properties during the 0.5% annual exceedance probability tidal flood event. The findings of the FRA, which concludes that the Scheme achieves compliance with the ethos of Section 14 of the National Planning Policy Framework, has been reviewed and approved by the Environment Agency, as evidenced in the draft Statement of Common Ground (document reference TR010035/APP/8.3).</p>
14.3	<p>The scheme area is located within the catchment of the River Wyre. The main surface watercourse located close to the road alignment is the Main Dyke but the scheme crosses a total of seven other water courses or field drains. The scheme crosses land located on the north side of Main Dyke that is at high risk of flooding (flood zone 3). Studies have shown that the main cause of flooding in this area is the twin culvert arrangement where the A585 crosses the Main Dyke and which restricts the flow of water during larger flood events. Flows in the Main Dyke are also influenced by the tidal nature of the River Wyre where high tides can prevent flood waters from flowing out into the estuary.</p>	<p>Flood risk from all of these sources is assessed in the Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1).</p>
14.4	<p>The part of the scheme aligned through the flood risk area is raised on embankment to ensure that the new road itself will not be at risk of flooding. However, this will result in a loss of flood plain capacity, potentially displacing floodwaters elsewhere, increasing the impact of flooding in existing flood risk areas or displacing water onto areas that do not currently flood.</p>	<p>The potential for construction of the Scheme embankment to the north of the Main Dyke to increase flood risk has been subject to detailed modelling assessment. During construction, prior to removal of the twin culvert A585 crossing of the Main Dyke, the embankment causes detriment to baseline flooding conditions. To mitigate this, the Scheme design includes for provision of a temporary floodplain compensation storage area adjacent to the Main Dyke. The storage system acts to attenuate peak flood flows in the Main Dyke and it has been demonstrated, through modelling, to reduce the temporary impacts of the Scheme on baseline flood risk. Further details are provided in the Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1), the conclusions of which have been approved by the Environment Agency. Note: Following construction, the Scheme reduces fluvial flood risk through improving capacity at the Main Dyke crossing of the trunk road at Skippool Bridge.</p>
14.8	<p>Subject to the Environment Agency being satisfied, the county council therefore considers that principles of the scheme are acceptable in terms of flooding. The National Planning Policy Framework requires that development be safe for its lifetime and therefore it is considered important that the modelling of impacts and design of mitigation measures takes account of likely climate change and sea level rise predictions over the longer term. The requirements attached to any Development Consent order should also clearly set out the phasing of the flood mitigation measures that will be provided and also for their design and landscaping. It is not clear from the Environmental Masterplan drawings if the flood compensation areas would be retained in agricultural use or how these areas would be landscaped. The county council considers that there is potential for such features to be designed in such a way to become part of the ecological mitigation for the scheme and therefore contribute towards net ecological gain.</p>	<p>Following completion of construction of the Scheme, the temporary flood compensation areas will no longer be required as the Scheme will not be located within the flood zone. Therefore, the flood compensation areas can be reinstated.</p> <p>A net ecological gain is demonstrated by the current Scheme as set out in Environmental Statement Appendix 8.9: Biodiversity Metric Calculations (document reference TR010035/APP/6.8.9).</p>
16.0	Impacts on the Local Highway Network	
16.1	<p>The proposed new road would change the pattern of vehicle movements on the local highway network. The Environmental Statement includes a Transport Assessment which investigates the impacts on the local highway network including</p>	<p>Ongoing discussions with Lancashire County Council (LCC) are occurring to address the concerns raised on the impact of the Scheme on the Local Highway Network. The Applicant has provided further detailed information to LCC and two further meetings have been undertaken</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>changes in traffic flow. The county council has a number of comments on this assessment as follows:</p> <ul style="list-style-type: none"> • The estimation of traffic impacts on local road that would be affected by the scheme has been based on various traffic models. However, the impacts and influences of the proposed highway on the wider road network such as within Poulton le Fylde is not always clear. • The Transport Assessment is based on various baseline data sources where it is indicated that they are 8 to 10 years old and have subsequently been adjusted to 2015. It is considered that this is a potential weakness in the model and is outside of Department for Transport guidance for transport studies in Web TAG. • There has been no *LINSIG modelling of the operation of the traffic light controlled junctions which is considered necessary to demonstrate how these junctions would work effectively. *LINSIG is a software tool that allows traffic engineers to model traffic signals and their impacts on junction capacities) • Section 5 of the Transport Assessment considers the future performance of the network. However, there is limited information on how some critical parts of the local highway network will operate. For example in the Transport Assessment Appendix A there are a number of diagrams showing how various roads will operate. For the A588 Breck Road (South of A585) in 2022 the AM peak flow is shown as -22% and – 11% in the PM. This suggests that some traffic reductions could be expected through Poulton. However, there is no further detail. For the A585 Garstang Road East (west of junction with proposed scheme) in 2022 AM peak flow is shown as +49% and PM flow +45%. Such increases would result in significant impact on the local highway network but no evaluation appears to have been carried out of the impact of such increases or how they might be mitigated. • The modelling also shows an 11% increase in traffic during the AM peak in 2022 on Lodge Lane which is unexpected and which needs further explanation. • On the A585 east of the Windy Harbour junction there would also be an increase in flow of 15% in the AM peak and 10% in the PM peak. There is a need to consider the impact of this increase and any mitigation along the A586 as far as the A6 junction particularly where the road passes through settlements (Great Eccleston and particularly St Michaels on Wyre) • There would also be increases in traffic on the A585 south of Windy Harbour in 2020 (AM peak flow of 13% and PM peak flow of 12%). This traffic would impact on the junctions north and south of the M55 particularly the Thistleton crossroads. • The existing A585 east of the Shard Road junction would experience reductions in traffic in the region of 90%. This raises the question as to whether the traffic lights are still needed at this junction. Would a mini roundabout or some other junction layout be a better solution? The county council would not wish to take on the burden of having to maintain the traffic lights if a more cost effective solution would suffice. 	<p>since these initial concerns were raised. In summary the responses that have been provided to LCC in these discussion are summarised below:</p> <ul style="list-style-type: none"> • The demand response of the Transport Model at a sector level is reported in Section 5.4.5 of the Transport Forecasting Package contained within the Combined Modelling and Appraisal Report, (document reference TR010035/APP/7.12) (Appendix F). Overall there is little change in the quantum of demand at a sector level. • It is advised within TAG Unit M3.1 that “trip matrices should not be taken from existing models unless the following conditions are met: - the trips having both ends in the Fully Modelled Area which were derived from survey data were based on survey data which are less than six years old.”. This advice is given as the base model should aim to be an accurate representation of current travel behaviours, at the point in time to which a scheme is assessed. The data age of the roadside interviews used to create the matrix for the scheme at the preliminary design stage (Stage 3) is as follows: <ul style="list-style-type: none"> • ANSA Consultants RSIs- May 2010 • Blackpool RSIs- May/June 2008 • Preston Western Distributor RSIs All Sites April 2014 Therefore, as of 2018 the end of Stage 3 both the Blackpool RSIs and the ANSA consultants RSIs are regarded as outside of the TAG guidance. At the beginning of Stage 3 it was decided by the Applicant to continue with the 2008 data for the following reasons: <ul style="list-style-type: none"> • Given the location of the scheme the Applicant took the view that the pattern of origin/destinations would not have changed significantly between 2008 and 2018. For example, the alternative routes towards Fleetwood/Cleverley’s are constrained by the River Wyre and the coastline. • Road schemes constructed near the A585 between 2008 and 2018 were deemed unlikely to have changed trip patterns materially in the local area as there are few alternatives to the A585. • Existing options selection model (Stage 2) was utilised to avoid delays to the construction programme. Although the matrix is based on old RSI data, 2015/2016 ATC data has been used to create a 2015 base year model. This data was used to calibrate and validate the model so that trips within the modelled area in the base year were representative of observed trips. • Following further discussion between the Applicant and Lancashire County Council held on 22/05/2019, it has been agreed that the Applicant will undertake LINSIG modelling for Skippool Junction and Skippool Bridge Junction. Further detail regarding the With and Without Scheme traffic flows on the A586 Garstang Road East and the junctions around Poulton have been presented and discussed with Lancashire County Council. • Junction analysis was undertaken using the Paramics Operational model for the Scheme junctions which change in design due to the Scheme which include Skippool, Skippool

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
		<p>Bridge, Poulton, Little Singleton and Shard Road junctions. Refer to the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) (Appendix H). The detailed operation of the highway network would be undertaken during the detailed design stage.</p> <ul style="list-style-type: none"> • Traffic flow is increasing northbound along Lodge Lane, in order to access the Scheme. The flow reduces Southbound in all other time periods. • 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 Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Highway England schemes on the Scheme which showed that when including the capacity improvement upgrades of adjacent potential schemes along the A585 route it remained economically worthwhile. • Tests were undertaken during Stage 3 to determine the optimum layout and staging arrangement to accommodate the change in traffic movements and flows through the A585 and Shard Road junction as a result of the Scheme. The movements between Shard Road and Mains Lane NW are the dominant movements through the junction in both peaks, so the final design has been developed to allow for these movements to run in a single stage, by implementing a splitter island on the Mains Lane NW approach. This significantly improves the operation of the junction compared to its existing layout. <p>Mini-roundabouts are not permitted when the speed limit on any of the approach roads is more than 30mph. An alternative conventional roundabout with an overall diameter of 48 metres was considered but the Applicant determined that the proposed traffic signal junction would operate more effectively and would provide the safest crossing of the junction for pedestrians and cyclists without additional signal controlled crossing points of Main Lane NW of the junction and Shard Road. A roundabout would further require additional land take of about 0.3 hectares of land from the field north-east of the junction and would require removal of most of the existing hedgerow/trees along the southern boundary of that field.</p>
16.2	<p>The county council considers that the traffic modelling data shows that there are a number of locations on the wider highway network where there is a clear increase in traffic and where there is a need for further consideration of mitigation measures or improvement with associated funding provision.</p>	<p>Junction analysis was undertaken using the Paramics Operational model for the Scheme junctions which change in design due to the Scheme. A detailed junction analysis was not undertaken for the remainder of the road network at Stage 3 Preliminary Design. The detailed operation of the highway network would be undertaken during the detailed design stage.</p>
16.3	<p>The reduction in status of the existing A585 would require a review of various traffic regulation orders that apply to the route or require new orders to be implemented. This would include a review of the existing speed limits, prohibition of driving (at the eastern end of Garstang New Road) and parking orders. The cost of such orders and any resigning required to implement them is considered to be small in terms of the overall costs of the scheme. There are also some particular issues with the Orders that will be required which are as follows:-</p> <ul style="list-style-type: none"> ☐ The proposed cycle route along the existing Mains Lane – it is expected that this would be advisory. If it were mandatory it would require a specific Order. 	<p>Traffic regulations orders sought to facilitate the Scheme are set out in Schedule 3 of the dDCO (document reference TR010035/APP/3.1).</p> <p>The proposed cycle route along the existing Mains Lane would be advisory and thus no order has been included in the application. This is in accordance with the Cycle Tracks Act 1984.</p> <p>Mains Lane to Lodge Lane would not be restricted to access only. Garstang New Road from Singleton junction to Grange footbridge would be declassified and restricted to access only for land owner field access.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>☑ The Environmental Statement indicates that the Mains Lane to Lodge Lane route would be restricted to access only. It is considered that this would be very difficult to enforce as this route provides a means of accessing Singleton, Weeton and a connection to the A585 via the B5269 at Thistleton crossroads. A weight restriction on this route might be a more practicable and enforceable alternative.</p> <p>☑ It is expected that there would be a need for traffic calming on the existing Mains Lane to create a self-enforcing 30mph road.</p>	<p>Through discussions with Lancashire County Council it was previously agreed that traffic calming measures should not be proposed as part of the Scheme.</p>
16.4	<p>The county council has also reviewed the designs of the new junctions from a capacity and safety perspective. The following comments are made in relation to the design of the new junctions:-</p> <p>☑ Skippool Junction – it is considered that there would be poor alignment for north - south traffic giving rise to a potential safety issue. A safety audit is required to demonstrate that the design of this junction would operate satisfactorily. A swept path analysis and LINSIG modelling is required to demonstrate that the junction operates satisfactorily. It is also considered that the junction design is potentially confusing for cyclists. There is also a need for further detailed design work in relation to the traffic signal head locations.</p> <p>☑ Skippool Bridge Junction: LINSIG modelling of the junction is required.</p> <p>☑ Poulton Junction; Again there is no LINSIG modelling of this junction.</p>	<p>Following further discussion between the Applicant and Lancashire County Council held on 22/05/2019, it has been agreed that the Applicant will undertake LINSIG modelling for Skippool Junction and Skippool Bridge Junction. The Applicant will continue to liaise with Lancashire County Council to resolve any outstanding queries.</p>
16.6	<p>The county council has reviewed the cycle provision and considers that there will be a need for Toucan crossings in the following locations: at the modified Shard Road junction as a minimum on the west side (arising from the traffic flows being higher), on the east side of the proposed Skippool Bridge junction, at the Skippool junction, at Poulton junction on the north side and at the modified Singleton junction.</p>	<p>The Scheme has provision for Toucan crossings at all junctions along the route as shown in the General Arrangement Plans (document reference TR010035/APP/2.5).</p>
16.7	<p>It is also proposed that the existing A585 would be detrunked after construction of the new road and that responsibility for the road would then transfer to the county council. As part of the scheme, a number of changes are proposed to the existing A585 in recognition of the reduction in traffic levels and changed status of the route. These changes have a number of implications for the county council as highway authority.</p>	<p>The changes as a result of the de-trunking have been discussed with Lancashire County Council and a draft legal agreement has been shared with them which seeks to address the implications of the de-trunking.</p>
16.8	<p>Representations have been made in relation to the impacts of the new bypass on bus services that currently serve the settlements that would be bypassed particularly in relation to the Blackpool to Lancaster service. The resident considers that the service operator will not wish to extend the bus journey distance by travelling into Little Singleton and then having to loop back to join the bypass. He considers that the road scheme should incorporate a turning lane / bus gate at its eastern end so buses can continue to use the existing road as at present. If the service no longer serves the communities along the existing A585, the resident considers that this would be a retrograde step when the policy should be to encourage greater use of public transport.</p>	<p>The provision of a dedicated bus turning land / bus gate at the Grange footbridge location was considered but discounted due to the impact on proposed journey time savings and safety of avoiding other motorists using the dedicated route. A meeting was held with Lancashire County Council (LCC), Stagecoach, Blackpool Transport Services Ltd and Lancashire Constabulary on 30/01/2018 where this was agreed. LCC has indicated that the Scheme will not result in a complete loss of public transport services to this area.</p>
16.9	<p>The comments of the resident are noted. However, the county council considers that provision of an additional junction on the bypass to allow buses access onto the existing A585 would add additional delay thereby affecting the economics of the scheme. In relation to the bus services, the county council has discussed this with the operator involved who has indicated that they would not continue to serve</p>	<p>See response at 16.8 above.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>Little Singleton given the extra distance needed to travel to this settlement and then loop back onto the bypass and taking into account the limited number of customers boarding / alighting in the Little Singleton area. However, the existing bus services that serve the western end of Mains Lane and then travel to Knott End along the A588 would continue and there is a possibility that the routes of other existing supported bus services in the area could be modified so that they serve the Little Singleton area. The construction of the bypass would therefore not result in a complete loss of public transport services to this area.</p>	
18.0	<p>Comments on Draft Development Consent Order</p>	
18.2	<p>The county council notes from the Book of Reference and the Land Plans that a significant number of its land holdings are proposed to be acquired by the developer in order to construct the scheme. In the main these are comprised of existing highway and land adjacent to the highways but also includes a property known as West Winds (plot 1/38a). The county council considers that the right approach has been taken in terms of acquiring the rights to the surface and subsoil of existing highways which equates with the approach that the county council has taken on its own highways schemes. However, the county council does not believe that the right approach has been taken where existing highways cross watercourses. The county council does not consider that ownership of the highway means that it is also riparian owner of half of the water course on adjacent land. The county council is listed as owner in plots 07, 32a and 38a which may not be the case.</p>	<p>The Applicant notes the comments and has, in the Book of Reference, erred on the side of caution and included persons who may have an interest in the land in the absence of definitive title information.</p>
18.3	<p>Article 34 – Tree and Shrub removal. This article permits the undertaker to remove or fell any tree or shrub within the Order limits unless it is identified as being retained in the Environmental Statement. The county council could not see any evidence within the Environmental Statement on a plan or plans which accurately define the trees and shrubs to be retained and those to be removed. A similar issue applies in relation to Article 37 although here there is no reference to the Environmental Statement.</p>	<p>It is not necessary or feasible to show the full extent of the trees and shrubs to be retained or removed along the full length of the Scheme. The extent of the landscaping, whether retained or new, to mitigate the impact of the Scheme is shown on the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19).</p>
18.4	<p>The county council has the following comments on the wording of the requirements in schedule 2 of the Development Consent Order:-</p> <ul style="list-style-type: none"> ☐ Many of the requirements require the applicant to submit further schemes of details for matters such as landscaping, drainage and archaeology. These requirements are worded such that the Secretary of State is responsible for approving these details. The county council does not understand why it is necessary for these details to be submitted to the Secretary of State and why they cannot be 'delegated' to the local planning authority as has been the case with other Development Consent Order applications. ☐ Requirement 4 - What is meant by the relevant planning authority? Is this Fylde BC or Lancashire County Council or both authorities. The Construction Environmental Management Plan will contain matters of interest to the county council in terms of a number of issues including highways and flooding and it is therefore considered that the county council should be included within the definition of relevant planning authority. ☐ Requirement 5 – this Requirement only seems to deal with tree and hedge planting and there is no requirement to submit details on any other aspect of the landscaping such as pond replacement, design of new ditches, ecological mitigation measures or restoration of the temporary compound areas. 	<p>The wording adopted in the Requirements set out in the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>Comments on the scope and form of the Requirements have been made by a number of authorities and are being considered by the Applicant collectively. The Applicant does however consider it appropriate that, given the number of authorities, that submission of any details pursuant to the Requirements should be to the Secretary of State following consultation with the other authorities.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>☐ Requirement 10 – it is assumed that this relates to construction traffic. The requirement might benefit from some more detail so it is more precise in detailing the information that is required.</p> <p>☐ The county council considers that there are a number of other matters that should be subject to Requirements. These include tree and hedgerow protection for the vegetation outside of the working area, provision of the temporary bird mitigation land and control of the management works that are to take place within that land, flooding issues in terms of the provision of the mitigation measures and surfacing materials to be used for the road.</p>	
LIR-002	Fylde Borough Council	
4.0	Statutory development plan	
4.3	<p>The Fylde Local Plan to 2032 (FLP) was formally adopted by the Council at its meeting on 22 October 2018 as the statutory, adopted development plan for the Borough. FBC considers the following policies of the FLP to be relevant to the proposed development:</p> <p>S1: The proposed settlement hierarchy – Sets out a four-tier settlement hierarchy by categorising identified settlements as “Key Service Centres”, “Local Service Centres”, “Tier 1 Larger Rural Settlements” or “Tier 2 Smaller Rural Settlements”.</p> <ul style="list-style-type: none"> • DLF1: Development locations for Fylde – Defines the development strategy for the Borough which directs the majority of growth for development towards the Key Service Centres and Local Service Centres identified in policy S1. • GD4: Development in the countryside – Identifies the limitations that will be applied to development within the Countryside Area defined on the Policies Map. • GD7: Achieving good design in development – Sets out the requirement for developments to achieve a high standard of design in accordance with 15 guiding principles. Additional considerations in relation to highway safety, climate change, existing land uses, flood risk and waste management are also relevant in this case. • GD9: Contaminated land – Identifies the criteria that need to be satisfied when dealing with proposals involving contaminated land. • EC1 – Overall provision of employment land and existing employment sites – Lists the employment sites allocated on the Policies Map. • H1: Housing delivery and the allocation of housing land – Specifies the Borough’s objective assessed housing need over the plan period and reinforces the need for housing to be located in accordance with the development strategy in policy DLF1. • INF1: Service accessibility and infrastructure – Sets out criteria applicable to developments involving new infrastructure provision and refers to the Infrastructure Delivery Plan (IDP) August 2016. • T1: Strategic Highway Improvements – Includes the safeguarding of land for strategic highway improvements and policy support for the delivery of three specific, planned strategic highway improvements in Fylde. • T4: Enhancing sustainable transport choice – Identifies the need for measures to improve accessibility across the Borough, improve safety and quality of life for residents and reduce the Borough's carbon footprint. • CL1: Flood alleviation, water quality and water efficiency – Sets out the 	<p>A review of the new policies has been undertaken and the overall planning policy position and conclusions in the Planning Statement and National Policy Statement Accordance (document reference TR010035/APP/7.1) and Environmental Statement (document reference TR010035/APP/6.1- 6.20) would not change.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	<p>requirement for developments to satisfy the sequential, risk-based approach to the location of the development, to minimise flood risk impacts and to maintain water quality and efficiency.</p> <ul style="list-style-type: none"> • CL2: Surface water run-off and sustainable drainage – Requires developments to dispose of surface water run-off in the most sustainable way, including the use of Sustainable Drainage Systems whenever practical. • ENV1: Landscape – Requires developments to have regard to their visual impact on surrounding landscapes and how their visual impact can be mitigated through the retention and introduction of landscaping. The policy also identifies the protection that will be afforded to the Coastal Change Management Areas defined on the Policies Map. • ENV2: Biodiversity – Identifies the hierarchy of nature conservation sites and the criteria that will be applicable to development within or affecting these sites, how damage to nature conservation sites will be interpreted and the protection that will be given to priority species. • ENV5: Historic environment – Sets out the requirement for developments to protect and, where appropriate, enhance the character, appearance, significance and historic value of Fylde’s designated and undesignated heritage assets. 	
6.0	The Principle of Development	
6.4	The scheme does not meet any of the limitations in FLP policy GD4 where development will be permitted in the countryside. Accordingly, negative effects would arise by virtue of the development’s substantial urbanising impact and an associated loss of open character within the countryside.	Whilst the development of a highway scheme is not listed as an exception to permitted development within the countryside, it is accepted that the improvements to the A585 can only take place within the area identified for the Scheme. Details of the rejected route options are provided in Environmental Statement Chapter 3: Alternatives (document reference TR010035/APP/6.3).
7.0	Biodiversity	
7.13	<p>Adequacy of the dDCO</p> <p>The mitigation measures summarised in paragraph 7.5 are detailed in the outline CEMP (Application document 7.2). The requirement in Schedule 2, Part 1, Paragraph 4 (1) of the dDCO requires the submission of a final CEMP to the Secretary of State “following consultation with the relevant planning authority to the extent that it relates to matters relevant to its function”. As the outline CEMP includes detailed measures to mitigate the development’s impact on designated nature conservation sites of international and national importance, FBC considers that Natural England must also be consulted on the final CEMP. Alternative wording for this requirement is, therefore, suggested in point 1 of FBC’s comments on the dDCO contained within the SoCG (FBC document 2.3).</p>	<p>The wording adopted in Requirement 4 of the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>The Applicant however notes and will consider the comments made by Flyde Borough Council in the draft SOCG.</p>
8.0	Cultural heritage	
8.4	<p>FBC agrees with the conclusions in the ES regarding the development’s negative effects on potential archaeological remains and the setting of the grade II listed Ice House. It is also noted that the adverse effects on the latter would arise from the harmful urbanisation of the listed building’s present open, rural setting.</p> <p>In that regard, FBC also considers there to be wider negative impact on the cluster of buildings located to the south and west of the Ice House – namely Singleton Hall, the Manor, Barnfield Manor and North Lodge – which are considered to have significance as ‘non-designated’ heritage assets. Of these, document 6.7 of the ES only recognises</p>	<p>The setting of the Grade II listed Ice House at Singleton Hall during the walkover survey was observed from within the draft order limits at Singleton Park. Access to the Ice House itself was not granted, however, from accessible areas the Ice House was not visible within the draft order limits due to the woodland planting that surrounds it. The presence of the woodland results in the setting of the Ice House, as being closed, not open, and separate to the fields to the north – refer to Environmental Statement Appendix 7.1: Desk Based Assessment (document reference TR010035/APP/6.7.1 – Rev 1)</p> <p>The assessment outlined within Environmental Statement Chapter 7: Cultural Heritage</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	Singleton Hall as a non-designated heritage asset. However, the Manor, Barnfield Manor and North Lodge, both individually and collectively, are also considered to have a level of heritage interest which is sufficient to warrant consideration of the scheme's impact on their significance.	(document reference TR010035/APP/6.7 – Rev 1) recognises both Singleton Hall (receptor 38) and Barnfield Manor (receptor 132 - referenced as Singleton Lodge as per the name given in Lancashire Historic Environment Record (HER), monument number MLA5939) as non-designated assets. The assessment concludes a neutral/slight significance of effect with the Scheme in place which would not be significant. The Manor and North Lodge are not part of Lancashire HER or locally listed therefore are not considered within the assessment.
8.5	As with the grade II listed Ice House, the bypass would have a negative impact on the setting of the building cluster surrounding the Lodge Lane bridge by urbanising their tranquil, rural setting. Moreover, the routing of the bypass would separate North Lodge from the rest of the building cluster by severing the original driveway link to Singleton Hall. These harmful visual effects and associated loss of significance to non-designated heritage assets would be compounded by the siting of a 2-3m high close-boarded acoustic fence atop the retaining wall along the southern edge of the bypass where it flanks this building cluster.	Landscape and visual impacts have been considered within Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9). Following discussions with Fylde Borough Council and their concerns regarding the acoustic fence in this area a commitment was added to the Record of Environmental Commitments (document reference TR010035/APP/7.3 – Rev 1) at Deadline 2 which states ' <i>The specification of the material of the acoustic fencing required along the Singleton Hall access road will be discussed with Fylde Council prior to construction commencing</i> '.
8.9	FBC also considers that an additional requirement relating to the design of acoustic barriers should be inserted in Schedule 2, Part 1 of the dDCO. Suggested wording for this insertion is given in point 7 of FBC's comments on the dDCO contained within the SoCG (FBC document 2.3).	A commitment was included within Revision 1 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) to state ' <i>The specification of the material of the acoustic fencing required along the Singleton Hall access road will be discussed with Fylde Borough Council prior to construction commencing</i> '. Revision 1 of the Record of Environmental Actions and Commitments was submitted at Deadline 2. The Applicant does not consider an additional Requirement in the DCO would be appropriate.
8.10	Summary of scheme impacts and relative importance of the issue 8.10 FBC considers that great weight should be given the development's impact on the significance of designated heritage assets (including, where applicable, heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments). The scheme's effects on the significance of non-designated heritage assets, while of lesser importance, should also be taken into account. In this case, harmful impacts would arise to both designated and non-designated heritage assets. These impacts could, to some extent, be addressed through amendments to the requirements of the dDCO.	The assessment presented in Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7 – Rev 1) has not identified designated heritage assets or heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments within the Scheme.
9.0	Landscape and visual	
9.4	The scale and extent of the proposed development is significant. Although it passes through a single landscape type it would, to varying degrees, affect all components of the coastal plain within which it is located, either through the loss of existing landscape features or by eroding its open character as result of its substantial urbanising impact. In particular, the route of the bypass would necessitate the removal of several hedgerows throughout the Order limits and the loss of three clusters of mature woodland protected by a TPO to the east of the Lodge Lane bridge, before running through a circa 8.5m deep cutting under Lodge Lane. The sides of the cutting would be supported by tall retaining walls, with 2-3m high acoustic barriers mounted above on both sides. Document 6.9 of the ES does not include a photomontage to show the appearance of this cutting (including the retaining wall and acoustic barrier). The scheme also includes the construction of a circa 5.7m high steel footbridge with ramped returns over the eastern end of the bypass to link with an existing public right of way. The loss of existing landscape features and the introduction of urbanising, utilitarian features that are incongruous to their setting would have significant negative effects on the surrounding	Landscape and visual impacts have been considered within Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9), and the Environmental Statement Changes and Corrections (document reference TR010035/APP/7.11 – Rev 1). With reference to the photomontage, all representative viewpoints and photomontage locations were agreed with both Wyre and Fylde Borough Councils. Photomontages are a tool used to help inform the assessment and have been selected from a select number of the representative viewpoints. From the northern end of the bridge (as represented by North Lodge) effects from this residential visual receptor (V-R-24-1) have been assessed as significant during construction and operation (both opening and design year). This conclusion would not change as a result of the production of a photomontage at this location.

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	landscape and the open, rural character of the countryside.	
9.5	Other negative visual effects would arise from the unsympathetic design of acoustic barriers in prominent locations – most notably that which is to extend along the southern fringe of the bypass to the east of the Lodge Lane bridge. As well as the negative visual effects to heritage assets identified in paragraph 8.5, the close-boarded fencing proposed in this location would have a very poor appearance in roadside views from Lodge Lane. This harmful visual impact could not be mitigated through the introduction of new landscaping as any such screening could only be placed on the southern side of the acoustic fence (thus leaving exposed views from vantage points to the north).	<p>The Applicant notes Fylde Borough Council have a preference for a red brick wall or alternative boundary treatment at this location. The acoustic timber fence shown on Viewpoint 10 is illustrative of the preliminary design.</p> <p>A commitment has been included within Revision 1 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) to state ‘<i>The specification of the material of the acoustic fencing required along the Singleton Hall access road will be discussed with Fylde Borough Council prior to construction commencing</i>’ submitted at Deadline 2.</p>
9.6	The application includes the introduction of approximately 47,287 m ² of deciduous woodland and 9,437 m ² of hedgerow planting. Whilst this represents a significant net gain in comparison to the permanent loss of circa 6,287 m ² of existing deciduous woodland and 4,221 m ² of hedgerow, much of this new planting would comprise immature, low-level species which, if successful, will take decades to mature. Accordingly, the adverse visual effects described in paragraphs 9.4 and 9.5 would be apparent throughout the short to medium term, before the proposed mitigation landscaping takes effect. That impact could, to a degree, be addressed by including a proportion of larger standard and heavy standard trees from the outset and by implementing a longer rectification period to allow for the replacement of species that are removed, become diseased or die.	<p>A commitment to include enhanced size nursery stock has been included within a number of planting areas throughout the Scheme, which will have a more established form at the Opening Year of the Scheme. This enhanced planting has been included in planting plots 002-03, 002-05, 003-03, 009-03, 009-06, 009-13, 009-18, 011-05, 011-07, and 011-15 of the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR00035/APP/6.19 – Rev 1). A commitment has also been included within the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3 – Rev 1).</p> <p>In addition, the REAC also makes a commitment to investigating early planting which would aid its establishment during the construction period and prior to the Opening Year of the Scheme.</p> <p>With regard to the rectification period, the Applicant notes the request for an extended rectification period. However, a 5-year rectification period (including management and maintenance) is standard practice and the Applicant considers it to be wholly appropriate in this case. The landscape mitigation planting measures are standard features and it is considered this period is sufficient to ensure that these have established without defects following planting. This is identified in the REAC.</p> <p>The contractor responsible for the implementation of the Scheme will be responsible for the maintenance of the Scheme and any defects which arise as a result of their implementation during this 5-year period. During this period monitoring would be undertaken to report upon the establishment of the mitigation measures.</p> <p>As set out in BS5387:2012, para 8.84 states that “<i>Regular maintenance of newly planted trees is of particular importance for at least three years during the critical post-planting period and might, where required by site conditions, planning requirements or legal agreement, be for 5</i></p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
		<p><i>years or more</i>”, and 5 years is being proposed for the rectification period which will include for maintenance and management.</p> <p>After this time soft landscape features within Highway England’s land ownership will continue to be managed and maintained in accordance with a maintenance schedule (set out in a Handover Environmental Management Plan (HEMP)) which will be prepared prior to the completion of the initial 5-year rectification period. The HEMP would set out the long-term management plan to ensure the mitigation levels are achieved by year 15, which is of critical importance to the reason these features are being implemented. This maintenance would be undertaken by Highways England as maintaining authority.</p>
9.7	<p>The amount of landscaping proposed as part of the scheme reflects the extent, magnitude and severity of the development’s visual impact. Document 6.9 of the ES indicates that the magnitude of the development’s visual impact and the significance of these effects will be “major” and “moderate – large adverse” at several locations. Therefore, whilst the amount of landscaping proposed is likely to provide effective screening of the development in the long term (along with some positive net gains in places), its success is dependent on a robust programme of rectification and ongoing maintenance.</p>	<p>Please refer to comments in response to item LIR-002, 9.6 above.</p>
9.8	<p>Appraisal of compliance with local policy The development’s harmful visual effects on the surrounding landscape and the loss of existing features of importance are in conflict with the provisions of FLP policy ENV1. As highlighted in paragraph 6.6, there is also conflict with FLP policy GD4 in this regard. These effects are, to a large extent, capable of being mitigated through the introduction of new soft landscaping buffers to screen the development. It is, however, the case that the beneficial effects of this mitigation would only become apparent in the long term. The effects of other, more localised, visually harmful aspects of the scheme such as the Grange footbridge and acoustic barriers could be addressed through amendments and additions to the dDCO in order to better assimilate these features into their surroundings and so ensure compliance with FLP policy GD7.</p>	<p>Please refer to comments in response to item LIR-002, 9.5 in relation to the commitment regarding acoustic barriers at Lodge Lane, and comment in response to LIR-001, 10.8.</p>
9.9	<p>Adequacy of the dDCO The requirement in Schedule 2, Part 1, Paragraph 5 of the dDCO deals with landscaping. As set out in the SoCG (FBC document 2.3), FBC considers that the 5 year rectification period mentioned in sub-paragraph (5) should be increased to 10 years. Suggested wording for this amendment is given in point 3 of FBC’s comments on the dDCO contained within the SoCG. In addition, FBC considers that the record of environmental actions and commitments (REAC), which is linked to the requirement in Paragraph 5 (2), should be updated to provide for the size, type and mix of planting identified in Appendix A of FBC document 2.5.</p>	<p>In response to the comments regarding the rectification period, please refer to comments in response to item LIR-002, 9.6. Commitments are provided within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1) that secure heavier planting stock where it has been discussed with stakeholders. Final landscape design will be developed at the detailed design stage. As part of the discharge of the final landscaping scheme Fylde Borough Council will be consulted regarding the size, type and mix of planting. Requirement 5 of the dDCO (document reference TR010035/APP/3.1) secures this.</p>
9.10	<p>FBC also considers that an additional requirement relating to the design of acoustic barriers should be inserted in Schedule 2, Part 1 of the dDCO. Suggested wording for this insertion is given in point 7 of FBC’s comments on the dDCO contained within the SoCG.</p>	<p>See response at LIR-002 paragraph 8.9 above.</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
9.11	<p>Summary of scheme impacts and relative importance of the issue</p> <p>The proposed development will have a significant impact on landscape character and visual amenity. These effects would be readily appreciable within the scheme's open countryside setting and substantial mitigation is required to compensate for and mitigate against the scheme's harmful visual effects. There is, however, no reason why this could not be achieved subject to the implementation of a suitable landscaping scheme which provides for an appropriate mix of species and is appropriately managed and maintained to deliver tangible long term benefits. Localised matters concerning the scheme's detailed design can also be addressed through the dDCO. At present, the local authority does not consider that the dDCO includes adequate mitigation for its landscape effects. Therefore, this matter is of significant importance.</p>	<p>Landscape and visual impacts have been considered within Environmental Statement Chapter 9: Landscape (document reference TR010035/APP/6.9), and the mitigation measures proposed are identified on the Environmental Statement Chapter 19: Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1).</p> <p>Commitments to address Fylde Borough Council's concerns documented here have been included within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1), and updates to the Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 1) submitted at Deadline 2.</p> <p>Requirement 5 of the dDCO (document reference TR010035/APP/3.1) secures implementation of this mitigation.</p>
10	<p>Transportation and traffic</p>	
10.1	<p>Policy background</p> <p>FLP policy T1 c) identifies "The A585 Skippool – Windy Harbour Improvements" as one of three planned strategic highway improvement schemes that are to be delivered during the plan period. The FCHTM also refers to the same improvement scheme and the "A585(T) Windy Harbour Junction Improvement" mentioned in the masterplan (the termination point at the eastern end of the proposed bypass) has now been completed. In addition to "a significant bottleneck at Singleton crossroads", which is to be addressed by the bypass, the FCHTM also identifies "other local problems on [the A585(T) between the M55 and Fleetwood". In particular, the masterplan indicates that "Highways England is also currently working to resolve capacity issues at Windy Harbour and at Junction 3 on the M55 and have committed to monitoring the southern section of the A585(T) from Windy Harbour to M55 Junction 3, bringing forward improvements where appropriate and beneficial, for instance potential improvements at the Thistleton crossroads."</p>	<p>See response at LIR-001 paragraph 6.6 above.</p>
10.5	<p>Statement of positive, neutral and negative local impacts</p> <p>The FCHTM identifies that "there are significant traffic volumes travelling to and from the Fleetwood peninsula via the A585(T), which at times already struggles to cope with current traffic levels, with particular problems at Windy Harbour and Singleton crossroads." The masterplan indicates that "traffic flows are consistently above 20,000 vehicles per day along the southerly length of the route, peaking at 28,000 on Mains Lane east of Skippool" and, in respect of HGV movements, that "between the Singleton and Windy Harbour junctions, the number [of HGVs] rises to almost 1,600 per day, with 1,300 HGVs to the north of the M55." The FCHTM also refers to "low average speeds between the Norcross and Windy Harbour junctions during both morning and evening peak hours. However, congestion is now an increasing problem during off-peak periods and at weekends. This makes journey times unreliable for local residents, businesses and visitors."</p>	<p>See response at LIR-001 paragraph 6.6 above.</p>
10.12	<p>The Applicant's approach to the consideration of alternative routes/solutions is summarised in paragraphs 4.26, 4.27 and 4.35 of the Table in Appendix A of Application document 7.1. In summary, this included three route corridors, five options for the "southern" corridor and two options for the "northern" and "online" corridors. The response in paragraph 4.35 also deals with the consideration of a "land bridge" over the Lodge Lane cutting and indicates that this was discounted following a "Value Management Workshop". The land bridge option would have delivered benefits in terms of reducing the scheme's visual and heritage impacts and, potentially, deliver a more effective and aesthetically pleasing means of noise attenuation. The non-inclusion of the</p>	<p>See response at paragraph 9.7 of the Comments on Relevant Representations (document reference TR010035/APP/7.9).</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
	land bridge is, therefore, considered to be a negative impact.	
10.15	<p>Adequacy of the dDCO Schedule 2, Part 1, Paragraph 10 (1) of the dDCO requires the submission of a traffic management plan to the Secretary of State “following consultation with the relevant planning authority”. As Lancashire County Council are the local highway authority for the area (and, accordingly, are best placed to comment on the suitability of the traffic management plan), it is considered that they are the appropriate party to be consulted in this respect. Suggested wording for this amendment is given in point 5 of FBC’s comments on the dDCO contained within the SoCG.</p>	<p>The wording adopted in Requirement 10 of the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>The Applicant however notes and will consider the comments made by Flyde Borough Council in the draft SOCG alongside comments made by Lancashire County Council.</p>
11.0	<p>Water environment</p>	
11.7	<p>Adequacy of the dDCO Schedule 2, Part 1, Paragraph 8 (1) and (2) of the dDCO require the submission of details for the disposal of surface and foul water to the Secretary of State “following consultation with the relevant planning authority”. It is noted that the FRA has been prepared in discussion with the lead local flood authority and the environment agency. It is, therefore, considered that those drainage bodies, along with United Utilities, are the appropriate parties to be consulted in this respect. Suggested wording for this amendment is given in point 4 of FBC’s comments on the dDCO contained within the SoCG.</p>	<p>The wording adopted in Requirement 8 of the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>The Applicant however notes and will consider the comments made by Flyde Borough Council in the draft SOCG alongside comments made by the other authorities referred to.</p>
12	<p>Socio-economic effects</p>	
12.11	<p>Adequacy of the dDCO As set out in paragraph 9.9, FBC considers that revisions are required to the dDCO with respect to the landscaping strategy that is proposed to mitigate the development’s visual impact. The same points are applicable with respect to ensuring suitable screening of the bypass from surrounding dwellings.</p>	<p>As indicated above, the Applicant considers that Requirement 5 of the draft Development Consent Order (document reference TR010035/APP/3.1) addresses this point but welcomes further discussions with Fylde Borough Council if it does not agree.</p>
13	<p>Emissions</p>	
13.4	<p>Document 6.11 of the ES identifies that the dwelling at “North Lodge” qualifies for sound insulation under the Noise Insulation Regulations (NIR). However, the response in point 9.4 of the Applicant’s comments on RRs (Table 1-1 of Application document 7.9) indicates that another dwelling (“the Manor”) would also qualify for insulation under the NIR. The local authority considers that the proximity of several dwellings around the Lodge Lane bridge to the bypass warrants further investigation of the effects of operational noise on these receptors, including whether additional properties would qualify for noise insulation under the NIR. The properties in question are identified in FBC’s response to point 9.4 of its deadline 2 submission document 2.5. It is also the case that the Applicant could offer “discretionary” insulation for these properties under the NIR. The installation of such insulation has the potential to reduce the development’s noise impacts on these properties from negative to neutral.</p>	<p>The assessment to determine whether properties qualify for noise insulation has been undertaken in accordance with the requirements set out under Regulation 3 of the Noise Insulation Regulations (NIR). Please refer to Environmental Statement Appendix 11.3: Noise Insulation Regulations Assessment (document reference TR010035/APP/6.11.3) and the Environmental Changes and Corrections Document (document reference TR010035/APP/7.11).</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
13.7	Impacts in terms of light and vibration would be most apparent at the construction stage, though any harmful effects in this regard could be addressed through the CEMP. FBC notes that the requirement in Schedule 2, Part 1, Paragraph (2) (c) of the dDCO includes construction working hours on Saturday afternoons (between 13:00 and 16:00). It is considered that working hours on Saturdays should cease at 13:00 to safeguard the amenity of neighbouring occupiers and provide some respite at times when residents would normally expect to be reasonably undisturbed.	A Section 61 prior consent application would be submitted by the contractor prior to any construction works commencing as outlined within the Record of Environmental Actions and Commitments (commitment 7K) (document reference TR010035/APP/7.3 – Rev 1) to safeguard the amenity of neighbouring occupiers.
13.9	Adequacy of the dDCO FBC considers that amendments and additions are required to the dDCO in order to address noise impacts. These include matters relating to hours of construction and the need for future monitoring of operational noise to determine whether additional properties surrounding the Lodge Lane bridge would qualify for statutory or discretionary insulation under the NIR. These changes are identified in points 2 and 8 of FBC's comments on the dDCO contained within the SoCG.	Regarding working hours a Section 61 prior consent application would be submitted by the contractor prior to any construction works commencing as outlined within the Record of Environmental Actions and Commitments (commitment 7K) (document reference TR010035/APP/7.3 – Rev 1) to safeguard the amenity of neighbouring occupiers. Qualification for noise insulation under the Noise Insulation Regulations (NIR) is determined by prediction in accordance with Calculation of Road Traffic Noise as specified under 'Provision 6 – Ascertainment of level of noise' of the NIR. As such the monitored noise levels could not be used to determine qualification under the NIR.
13.10	FBC also considers that an additional requirement relating to the design of acoustic barriers should be inserted in Schedule 2, Part 1 of the dDCO. Suggested wording for this insertion is given in point 7 of FBC's comments on the dDCO contained within the SoCG.	See response at LIR-002 paragraph 8.5 above.
13.11	Summary of scheme impacts and relative importance of the issue The development would give rise to both positive and negative impacts to different receptors in terms of noise. The local authority considers that additional mitigation measures are required within the dDCO to prevent noise from having an unacceptable impact on the amenity and living conditions of negatively impacted occupiers in close proximity to the bypass. Benefits would arise in terms of air quality and effects from vibration and light could be adequately mitigated. At present, the local authority does not consider that the dDCO includes adequate mitigation for effects arising from noise emissions. Therefore, this matter is of significant importance.	Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11) concludes that in accordance with the Noise Policy Statement for England and the National Networks National Policy Statement operational road traffic noise impacts (with the proposed mitigation in place) would not have significant adverse impact on health and quality of life. Beneficial effects on air quality are noted. Mitigation for light and vibration are outlined within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 1).
LIR-003	Wyre Borough Council	
4.0	Other relevant development proposals	
5.0	Comments on the DCO and the 'Requirements' (Schedule 2)	
5.1	Any reference in the DCO to "Wyre Council" should be replaced with "Wyre Borough Council".	The dDCO (document reference TR010035/APP/3.1) will be updated accordingly.
5.2	In Part 6 'Operations' Article 34 (1) – this should say "The undertaker may after consultation with the relevant planning authority fell or lop.....". Likewise in Article 37 (1) this should say "The undertaker may after consultation with the relevant planning authority fell or lop....."	The wording adopted in Articles 34 and 37 of the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording adopted by other made development consent orders. The Applicant invites Wyre Borough Council to confirm why it wishes to deviate from this approach and be consulted before the felling or lopping of any trees or shrubs.

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
5.3	In Schedule 2 (Requirements), in Requirement 4 (1) what is defined as a “part” of the authorised development? Does this relate to a “Work” identified in Schedule 1 or to a collection of works making up a stage or phase of the development or to geographical area or section of the development? This is not made clear and what constitutes a “part” of the development requires clarification.	Part means a collection of works making up a stage or phase of the Scheme. The extent of the collection of works will be determined by the contractor at the detailed design stage.
5.4	In Schedule 2 (Requirements), in Requirement 4 (2) (c) there is no reference to, and therefore no restrictions on working during Sundays or Bank Holidays. In the interests of the amenity of those living close to the development works additional restrictions relating to working on Sundays and Bank Holidays should be included.	A Section 61 prior consent application would be submitted by the contractor prior to any construction works commencing as outlined within the Record of Environmental Actions and Commitments (commitment 7K) (document reference TR010035/APP/7.3 – Rev 1) to safeguard the amenity of neighbouring occupiers.
5.5	In Schedule 2 (Requirements), in Requirement 10 (Traffic management), it is considered that the words “following consultation with the relevant planning authority” should be replaced with “following consultation with the local highway authority”.	<p>The wording adopted in Requirement 10 of the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>Comments on the scope and form of the Requirements have however been made by a number of authorities and are being considered by the Applicant collectively.</p>
5.6	The requirements for the most part require details/information to be submitted to the Secretary of State for approval. There is nothing in the DCO, however, that identifies who/which authority is responsible for monitoring compliance with the approved scheme details or who is responsible for any enforcement action to secure compliance if/when necessary. This needs to be clarified.	<p>The wording adopted in the Requirements set out in the draft Development Consent Order (document reference TR010035/APP/3.1) is in accordance with the Planning Act 2008 and the advice issued by the Planning Inspectorate. It is additionally consistent with the wording and approval process adopted by other made development consent orders.</p> <p>Comments on the scope and form of the Requirements have been made by a number of authorities and are being considered by the Applicant collectively.</p>
7.0	Socio Economic Impacts arising from the development	
7.1	The Council has recently adopted its Local Plan which makes provisions for both housing and economic growth up to 2031. This growth can only be sustainable if it is supported by the necessary provision of infrastructure. The Council’s Infrastructure Delivery Plan (IDP) which supports the Local Plan identifies the necessary transport infrastructure improvements which are required to support sustainable growth. This includes improvements to the A585(T) along its corridor, from J3 M55 to Fleetwood. It is acknowledged that there have been improvements to certain key junctions e.g. West Drive, and Bourne Way, Thornton, and proposed improvements arising from the proposed Norcross roundabout improvements and this scheme. However, without a comprehensive approach to the whole corridor, the growth, particularly economic growth, may be stifled. There is a danger, particularly as traffic numbers grow with housing growth, that improvements to one or more junctions as is proposed, will simply amplify issues at junctions up or downstream. Furthermore, any beneficial impacts of the scheme may be negated by congestion or safety issues at other junctions or sections of highway. The Secretary of State must therefore consider this proposal in the light of the needs of the whole A585(T) corridor from and including J3 M55 to Fleetwood, in order for the economic growth and regeneration identified in the Local Plan to be forthcoming.	<p>The Applicant completed all traffic modelling forecasting requirements, for which the Local Plan information is an input, in September 2018. The Development Consent Order for this application was submitted for acceptance in October 2018 and the Wyre Local Plan was adopted in February 2019.</p> <p>The Local Plan information assists with the traffic forecasting process and is the basis of the Uncertainty Log as described in 3.3.27 to 3.3.32 in Transport Assessment (document reference TR010035/APP/7.4). Traffic growth in each local area is defined by the National Trip End Model (NTEM version 7.2) while the Uncertainty Log is used to distribute the forecast NTEM growth in areas where development is planned rather than distributing it evenly across the area. All forecasts are constrained by the NTEM values.</p> <p>In view of the change in status of the Plan since the submission of the Application, a review has been completed to confirm the size and number of allocations and can confirm the following:</p> <p>16/00217 – Arthurs Lane, Hambleton – 165 dwellings (allocation SA1/10 in Local Plan) 165 dwellings considered in the core scenario</p> <p>16/00905 – London Street, Fleetwood – 38 dwellings Not included</p>

Reference Number	Comment from Local Impact Report	Response to comment on Local Impact Report
		<p>16/00651 – Land off A586 Great Eccleston – 22 dwellings 90 dwellings considered in the core scenario</p> <p>16/00742 – Brockholes Crescent, Poulton – 108 dwellings (part of allocation SA1/4 in Local Plan) Land off Holts Lane, Poulton-Le-Fylde, 130 dwellings considered in the core scenario</p> <p>18/00075 – Stalmine – 65 dwellings (allocation SA1/7 in Local Plan) 77 dwellings considered in the core scenario</p> <p>17/01154 – Hardhorn Road, Poulton – 30 dwellings Land at Carr Head Lane Poulton-le-Fylde, 100 dwellings considered in the core scenario</p> <p>18/00614 – Breck Road, Poulton – 12 dwellings 35 dwellings considered in the core scenario</p> <p>18/00860 – Norcross Lane, Thornton Cleveleys – 66 dwellings (part of allocation SA1/9 in Local Plan) 70 dwellings considered in the core scenario</p> <p>Poulton off Tithebarn Street / Poulton Road / Blackpool Road Carleton (allocation SA1/6 in Local Plan) has been increased from 154 to 300 dwellings following examination of the plan which took place during spring/summer 2018. 150 dwellings for Year 2022 and 500 dwellings for Year 2037 considered in the core scenario</p> <p>As indicated above the number of dwellings accounted for in the Uncertainty Log and subsequently the core scenario forecasts are higher than the adopted Local Plan. London Street, Fleetwood, has not been accounted for individually in the forecasts but due to the number of dwellings and distance from the Scheme, the Applicant is content the National Trip End Model will still account for growth in this area.</p>

Page left intentionally blank