

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

**TR010035**

## **7.21 Comments on Written Representations Received at Deadline 3**

APFP Regulation 5(2)(q)

Planning Act 2008

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

Volume 7

July 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 WRITTEN REPRESENTATIONS RECEIVED  
AT DEADLINE 3**

---

<b>Regulation Number:</b>	Regulation 5(2)(g)
<b>Planning Inspectorate Scheme Reference</b>	TR010035
<b>Application Document Reference</b>	TR010035/APP/ 7.21
<b>Author:</b>	A585 Windy Harbour to Skippool Improvement Scheme Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 0	July 2019	Deadline 4 Submission

*Page Left Intentionally Blank*

## **CONTENTS**

<b>1</b>	<b>COMMENTS ON WRITTEN REPRESENTATIONS .....</b>	<b>1</b>
----------	--	----------

## **LIST OF TABLES**

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

<b>Abbreviation</b>	<b>Meaning</b>
ALC	Agricultural Land Classification
Outline CEMP	Outline Construction Environmental Management Plan
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DML	Deemed Marine Licence
ExA	Examiner appointed by the Secretary of State
FRA	Flood Risk Assessment
HRA	Habitats Regulations Assessment
LPA	Local Planning Authority (either Fylde Borough Council or Wyre Council)
MMO	Marine Management Organisation
REAC	Record of Environmental Actions and Commitments
SoCG	Statement of Common Ground
SPA	Special Protection Area
UKCP18	UK Climate Projections 2018

## **1 COMMENTS ON WRITTEN REPRESENTATIONS**

- 1.1.1 The purpose of this document is to set out the Applicant's comments on the Written Representations (WR) received at Deadline 3 from the interested parties.
- 1.1.2 It also captures representations from Lancashire County Council at Deadline 2.
- 1.1.3 These can be found in Table 1-1 below.



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

Reference Number	Comment from Written Representation	Response to Written Representation
<b>REP3-014</b>	<b>Cadent Gas Limited</b>	
REP3-014.1	Cadent Gas Limited (Cadent) has submitted a written representation and a response to Question 1.2.7 of the ExA's first round of written questions. Cadent's written representation id	Noted, no further response required
REP3-014.2	Cadent's only comments for Deadline 3 relate to:  Document 7.14: EXQ.1.1.9: PA2008 S.127 Statutory Undertakers Land/Rights; Document 7.15: EXQ.1.1.10: PA2008 S.138 Statutory Undertakers Apparatus etc.	Noted, no further response required
REP3-014.3	In relation to these documents, Cadent's position is that the dDCO does not currently contain protective provisions for the protection of Cadent's apparatus that are to Cadent's satisfaction. Further, the dDCO does not address fully how property rights would be made available for the diversion of Cadent's assets to Cadent's satisfaction.	The Applicant is in discussions with Cadent about the terms of the protective provisions included within the dDCO.
REP3-014.4	It is essential that these issues are addressed to Cadent's satisfaction to ensure the protection of Cadent's apparatus.	Noted
REP3-014.5	At this stage, Cadent is not satisfied that the tests under section 127 of the PA 2008 can be met as Cadent is not satisfied that:  Its land can be purchased and not replaced, or that any rights over its land can be acquired, without serious detriment to the carrying on of Cadent's undertaking;  (Where its land is to be purchased) it can be replaced by other land belonging to, or available for acquisition by, Highways England without serious detriment to the carrying on of Cadent's undertaking; or  (Where rights over its land are to be acquired) any detriment to the carrying on of Cadent's undertaking, in consequence of the acquisition of the right, can be made good by Highways England by the use of other land belonging to or available for acquisition by them.	The Applicant does not seek to acquire any land in the ownership of Cadent. Cadent's interests in the land to be acquired are limited to rights in respect of its gas apparatus. The Applicant confirms that any detriment to Cadent's undertaking will be addressed by the diversion of its apparatus through the land or rights secured by the Applicant pursuant to the DCO.
REP3-014.6	Protective provisions are yet to be agreed with Highways England, but discussions are ongoing.	Noted, no further response required.
<b>REP3-015</b>	<b>Environment Agency</b>	
	<b>Flood Risk Assessment</b>	
REP3-015.1	As stated in our Written Representation, we provided feedback to the Applicant's consultant (Arcadis) on a draft version of the revised FRA, application document reference TR010035/APP/5.2 (Rev 1), dated May 2019, through our charged planning advice service prior to submission at Deadline 2. We have reviewed the revised FRA as submitted to the ExA at Deadline 2 and we are satisfied that our comments have been taken onboard. Our comments provided in our Written Representation remain applicable.	Noted, no further response required.
REP3-015.2	We will provide an update in due course in relation to the Requirement we are seeking for the details confirming the proposed design, function, construction and	The following Requirement will be included within the dDCO (document reference TR010035/APP/3.1) submitted at Deadline 5, the wording has been agreed with the

Reference Number	Comment from Written Representation	Response to Written Representation
	decommissioning of the temporary compensatory flood storage area.	<p>Environment Agency refer to the Statement of Common Ground with the Environment Agency (document reference TR010035/APP/8.3).</p> <p><i>Development shall not be commenced within the 1% plus 30% for climate change flood extent of the Main Dyke, illustrated in Figure D8 of the Flood Risk Assessment (document reference TR010035/APP/5.2 – v1), until details of a temporary compensatory flood storage scheme is submitted to and approved in writing by the Secretary of State. The scheme shall include details of the design, function, construction and, as appropriate, decommissioning of the temporary compensatory flood storage area, to ensure that a suitably engineered solution is provided that will not impede access to Main Dyke (Skipool Creek) for maintenance purposes and will allow for the storage and subsequent drain down of flood waters that would be displaced by the development.</i></p> <p><i>The scheme shall be fully implemented as approved and subsequently maintained in accordance with the approved details until it is decommissioned.</i></p>
REP3-015.3	We also wish to provide clarification on the proposed dwarf walls, as referred to in sections 9.1.4 and 11.1.8 of the FRA. The dwarf walls are a flood risk critical aspect of the scheme not yet at the detailed design stage, and are therefore subject to further discussion with us. We are aware that further detail will be provided, in due course, by the Applicant's appointed contractor to progress permit discussions.	The appointed Contractor will liaise with the Environment Agency during the detailed design phase of the Scheme and apply for relevant environmental permits in due course once detailed design information is available.
REP3-015.4	<p>We consider the proposed dwarf walls as flood risk activities listed in Schedule 25 of the Environmental Permitting (England and Wales) Regulations 2016:</p> <p><i>(g) any activity (other than an allowed activity) on a flood plain that is—</i></p> <p><i>(i) more than 8 metres from a non-tidal main river or more than 16 metres from a tidal main river, or;</i></p> <p><i>(ii) more than 8 metres from any flood defence structure or culvert on a non-tidal main river or more than 16 metres from any flood defence structure or culvert on a tidal main river, which is likely to divert or obstruct floodwaters, to damage any river control works or to affect drainage;</i></p>	Applications for flood risk activities will be prepared and submitted by the Contractor once detailed design information is available.
REP3-015.5	It is stated (section 9.1.4) that the dwarf walls require gaps to maintain disability access requirements, and 'flood boards' would be deployed during times of flooding, but it is not clear from the FRA, or flood warning and evacuation plan, who would be responsible for deployment or what the design and specification will be.	Additional information regarding the deployment of flood boards has been included within Revision 1 of the Flood Warning and Evacuation Plan which is appended as Appendix Q of Revision 2 of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 - Rev 2). These will be submitted at Deadline 4.
<b>Flood Warning and evacuation plan (FWEP)</b>		
REP3-015.6	We have reviewed the submitted FWEP, application document reference TR010035/APP/7.2 (Rev 0), dated May 2019, which is included in Appendix Q of the Outline Construction and Environmental Management Plan, application document reference TR010035/APP/7.2 (Rev 0), dated May 2019, and further to our comments provided in our Written Representation, we are generally satisfied the issues we raised have been addressed. This is in relation to the availability of our flood warning service and the likely duration, depths, velocities and flood hazard rating against the design flood event for the proposed development, as stated in our Written Representation.	Noted, no further response required.
REP3-015.7	Although the FWEP is appended to the Outline CEMP, which is listed as a Document to be Certified in Schedule 11 of the draft Development Consent Order, the ExA may wish to consider having the FWEP separately listed in this schedule, as it is	The draft Flood Warning and Evacuation Plan is included as Appendix Q of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.3 –

Reference Number	Comment from Written Representation	Response to Written Representation
	fundamental to the flood risk management of the Scheme.	Rev 2) as this document will eventually become the Handover Environmental Management Plan, which is an operational document to be handed over post construction. The Flood Warning and Evacuation Plan sits under this overarching operational document. Therefore it is not suitable for the FWEP to be a certified document as it will not be in a final form when the DCO is made.
REP3-015.8	The ExA should be aware, however, that details on operational triggers for deployment of 'flood boards' (as referred to above in section 1) are not currently covered in the section 7.3 of the submitted FWEP. It should be noted that the Environment Agency will not be responsible for the deployment of third party flood defence measures. This should be addressed in the FWEP to ensure the correct course of action is taken in the event of a flood.	Additional information regarding the deployment of flood boards has been included within Revision 1 of the draft Flood Warning and Evacuation Plan which is appended as Appendix Q of Revision 2 of the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 - Rev 2). These will be submitted at Deadline 4.
	<b>The Applicant's 'Responses to Examining Authority's First Written Questions' (ExQ1)</b>	
REP3-015.9	While this question is not addressed to the Environment Agency, we note that it relates to the application of the UKCP18 climate change allowances and the extreme H++ scenario. As such, we wish to provide clarification to the ExA on this issue. UKCP18 and H++ are not the same and in relation to the proposed development, the Applicant has considered the impacts of UKCP18 allowances on flood risk to the proposal. We had suggested that the Applicant considers the H++ scenario, but this is not mandatory, and given the difference in flood depths associated with the two scenarios, the development would not be operational in an H++ scenario based on the mitigation agreed for UKCP18 events and below.	Noted, no further response required.
	<b>Temporary compensatory flood storage area</b>	
REP3-015.10	The ExA and Applicant should be aware that if the spatial arrangement (as indicated on the Works and General Arrangements plans) of the temporary compensatory flood storage area subsequently approved as part of the DCO may have to change as a result of detailed design.	The detailed design and spatial arrangements of the compensatory flood storage areas will be designed within the parameters permitted by the dDCO. Refer to response provided to REP3-015.2.
REP3-015.11	We note that several ponds are to be temporarily removed during construction. We would suggest that the Applicant considers incorporating the ponds within the flood storage areas.	Noted. Further consultation with the Environment Agency regarding the detailed design of the temporary flood storage areas will be undertaken by the Contractor during the detailed design phase. Refer to response provided to REP3-015.2.
	<b>Protective provision</b>	
REP3-015.12	We have reviewed the submitted draft Development Consent Order, application document reference TR010035/APP/3.1 – Rev 2 (dated May 2019), and we are satisfied that the protective provision previously included for our benefit has been removed.	Noted, no further response required.
	<b>Outline Construction and Environmental Management Plan (Outline CEMP)</b>	
REP3-015.13	In relation to section 1.2.2, bullet point 8, of the updated Outline CEMP, application document reference TR010035/APP/7.2 – Rev 1 (dated May 2019), further clarification should be provided as to what is considered as 'appropriate provision' for ensuring Environment Agency access to main river watercourses and flood risk management structures to carry out our statutory duties is not restricted.	Commitment 8W within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) outlines that access for the Environment Agency would comprise ' <i>ensuring a minimum 8 metre wide unrestricted buffer zone adjacent to all Main River watercourses and other EA flood defence assets</i> '.
	<b>Record of Environmental Actions and Commitments (REAC)</b>	
REP3-015.14	Section 8Z (ii) of the updated REAC, application document reference TR010035/APP/7.3 – Rev 1 (dated May 2019), states that assessment of any likely flood risk impacts will be made where any haul roads are constructed across the	Commitment 8Z within Revision 2 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) has been amended to clarify the level of assessment to be undertaken. Revision 2 of the Record of Environmental Actions and

Reference Number	Comment from Written Representation	Response to Written Representation
	floodplain, and/or any other temporary ground raising or stockpiling of materials in the floodplain. However, it is not clear how such assessment is proposed to be undertaken. We would therefore ask for the document to be updated to include commitment to undertake further flood risk assessment, and further modelling work if deemed appropriate to the nature and scale of the work.	Commitments will be submitted at Deadline 4.
<b>REP3-016</b>	<b>Fleetwood Renewable Energy Enterprise 2007</b>	
REP3-016.1	<p>I have attached a response by Jeff Draper to the Written Representation by Matt Hodges regarding Mr Draper's Oral Representation at the Hearing at Wyre Civic Centre. Matt Hodges Comment on my Oral Representations at the Open Floor Hearing on 9 April 2019.</p> <p>I am also a cyclist and a walker and it is not necessary to stop traffic on all the roads at a junction on for the occasional person to cross the road. Pedestrian crossing traffic lights at busy junctions can be activated as and when required without imposing unnecessary delays on motorists 24/7.</p> <p>I have copied below Highways England's view on the failed £317m scheme for using traffic lights.</p> <p>David Wild was Highways England's adviser for the earlier plan to improve the A585 to Fleetwood and was involved with the bypass. In designing the bypass junctions the disruptive effect of traffic lights in above mentioned report by Highways England has not been taken into account.</p> <p>The negative effect of traffic lights can be seen by comparing traffic movements at Shard Road and Skippool Junctions. At Skippool Island traffic flows freely onto Amounderness Way if it is relatively clear. On the other hand traffic in the opposite direction is grid-locked from Shard Road Junction back to Norcross due to the traffic lights.</p>	<p>The attached article relates to motorway junctions, which this Scheme is not. It also relates to the Highways England pinch-point programme, which looks at small isolated junction improvements. The A585 Windy Harbour to Skippool Improvement Scheme is an all-purpose dual carriageway and falls under the major projects programme, which aims to provided larger wholesale improvements to the strategic road network.</p> <p>The traffic model assesses the optimisation of the junctions and it was found that traffic signal-controlled junctions performed better than roundabouts for this Scheme, these were assessed through option selection to preliminary design.</p>
REP3-016.2	A flood barrier would prevent flooding on both sides of the River Wyre including areas as far from the river as Pilling and it would take traffic off the busy A585 when a road across Pilling sands is built. From this point it is only a short distance to the M6 at Hampson Green. Can it be that as Matt Hodges lives in Scorton the congestion on the A585 is not a problem to him?	Noted, however this would cost considerably more than the Scheme and is outside Highways England's remit.
REP3-016.3	<p>With modern techniques applied by the Dutch Engineers a Road across Pilling Sands would not entail the complication of building the bypass. It would cost less than the bypass and prevent flooding. The journey time from Broughton on the M6 and along a suitable highway would be quicker than using the M55 and the A585 to reach the coast.</p> <p>A tidal range power plant in the Flood Barrier across the River Wyre would generate enough reliable green energy to power electric cars for a billion miles per year. Far from contributing to global warming; the scheme would have the reverse effect. In addition it would prevent flooding, take traffic off the A585 to the coast where most of the commuters live; and be self-funding from sales of electricity.</p>	The Applicant disagrees and the proposal would cost several times more than the Scheme.
<b>REP3-017</b>	<b>Fylde Borough Council</b>	
REP3-017.1	Fylde Borough Council (FBC) has reviewed the deadline 2 submissions published on 22 May 2019 in connection with the above Application. The contents of some of those submissions affect or alter the Council's case as currently presented in its deadline 2 submissions. The comments below identify those instances under separate topic headings and highlight areas where changes to the Council's case arise as a result. FBC's position concerning all other matters remains as set out in its deadline 2	Noted, no further response is required.

Reference Number	Comment from Written Representation	Response to Written Representation
	submissions.	
	<b>Comments on responses to the Examining Authority's (ExA) First Written Questions (ExQ1)</b>	
REP3-017.2	FBC notes that Lancashire County Council's (LCC) response to this question clarifies the scope of archaeological investigations that have been carried out to date (including "trial excavation and open area excavation"). LCC's response also states that "in the opinion of the County Council's archaeological advisor, [none of the remains found during archaeological works were] of sufficient importance to merit inclusion in the Schedule of Monuments under the Ancient Monuments and Archaeological Areas Act 1979 or to be otherwise preserved in situ at the expense of development". Moreover, LCC consider that "there is no reason to suppose that any further elements of the same settlement site that might be affected by the proposed A585 road scheme would be of any higher value or significance". Accordingly, LCC are content with a "mitigation approach of 'preservation by record' [...] subject to archaeological investigation prior to development". LCC do, however, consider that additional wording is required in Schedule 2, Part 1, Requirement 9 of the draft Development Consent Order (dDCO) to ensure that "any earth moving operations within any areas of interest identified in the scheme of investigation are not commenced until such time as the investigation works have been completed".	Refer to response to REP2-70.1 below.
REP3-017.3	FBC's current response to question 1.4.1 suggests that additional provisions are made in Schedule 2, Part 1, Requirement 9 of the dDCO for the in-situ preservation of any previously unidentified archaeological remains affected by the development in the event that these are "demonstrably of equivalent significance to scheduled monuments". This recommendation is carried through in point 10 of FBC's schedule of amendments to the dDCO set out in its Statement of Common Ground (SoCG) (p. 43 of FBC document 2.3). However, LCC's response to question 1.4.1 clarifies that, based on the archaeological investigations undertaken to date, the relative significance of archaeological remains affected by the development would not warrant their in-situ preservation. Accordingly, FBC no longer considers this specific change to Requirement 9 of the dDCO to be necessary. It is, however, the case that a different amendment is required to Schedule 2, Part 1, Requirement 9 of the dDCO to deal with the timing of earth moving operations within any areas of archaeological interest as set out in LCC's response to question 1.4.1.	Refer to response to REP2-70.1 below.
REP3-017.4	FBC notes LCC's comments regarding the significance of non-designated heritage assets surrounding Singleton Hall. In particular, and with reference to the Historic Environment Record (HER), LCC conclude that "despite [their] lack of designation, the buildings and park are of some local heritage value and some mitigation is justified". In terms of the design of any acoustic barrier flanking this group of buildings, LCC indicate that "given the historic setting, it may be appropriate for the screening in this location to be provided by a brick wall rather than a wooden fence with a modern design." FBC agrees with LCC's assessment in this regard.	Commitment 7L within Revision 2 of the Record of Environmental Actions and Commitments has been updated to state ' <i>Prior to construction commencing, FBC will be consulted about the siting, design, materials and finish of the 2m high acoustic barrier required adjacent to the Singleton Hall access road. Any consultation response shall inform the detailed design of the barrier</i> '. Refer to the updated Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) which will be issued at Deadline 4. It has been agreed with Fylde Borough Council that an additional Requirement in the dDCO is no longer required, refer to Statement of Common Ground with Fylde Borough Council (document reference TR010035/APP/8.5 – Rev 1).
REP3-017.5	For the reasons set out in its own response to question 1.4.2, FBC agrees with the Applicant that a financial contribution towards a "Heritage Improvement Scheme" is not required in this instance. However, FBC does not consider the Applicant's response to question 1.4.3 concerning the design of the acoustic barrier to the north of Singleton Hall (as carried through under reference no. 7L in Rev 1 of the Record of	Refer to response to REP3-017.4 set out above.

Reference Number	Comment from Written Representation	Response to Written Representation
	Environmental Actions and Commitments – REAC) to be sufficient. The reasons for this and the need for changes to the REAC and dDCO are set out in point 9.6 of FBC’s deadline 2 submission document 2.5, and Point 7 of FBC’s schedule of amendments to the dDCO contained in the SoCG (p. 41 of FBC submission document 2.3).	
REP3-017.6	FBC acknowledges the Applicant’s comments regarding the design of the Grange Footbridge and the provision of supplementary planting around it as presented in Rev 1 of the Environmental Masterplan. It is also noted that reference no. 5L of the revised REAC (Rev 1) specifies the typical stock size of planting and a commitment for at least 30% of species to be evergreen specimens within this area. However, for the reasons set out in point 9.3 of FBC’s deadline 2 submission document 2.5 (and Appendix A), the Council does not consider the Applicant’s response – including the associated revisions to the REAC – to be sufficient to deal with this issue.	<p>The Applicant acknowledges Fylde Borough Council's comments regarding the additional planting provided at Grange Footbridge and considers the additional planting aids the resolution of previous screening concerns raised by Fylde Borough Council.</p> <p>An outline planting specification (based on that provided by Fylde Borough Council) has been provided within Appendix R of Revision 2 of the Outline Construction Environmental Management Plan (CEMP) (document reference TR010035/APP/7.2 – Rev 2). In addition a commitment (5M) has been provided within Revision 2 of the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3 - Rev 2), which will ensure the specification will inform the detail design planting mixes and specifications (which will also be subject to further consultation with Fylde Borough Council). Revision 2 of the REAC, Outline CEMP and Environmental Masterplan will be submitted at Deadline 4.</p>
REP3-017.7	FBC can confirm that Highways England have now agreed to the discharge of all conditions applied for under application reference 18/0726 that are relevant to their role (specifically conditions 7 and 11). As the requirements of condition 12 carry a ‘pre occupation’ trigger, the agent instructed FBC to remove reference to this condition from application 18/0726. Accordingly, the Council has now issued its formal decision on application 18/0726, a copy of which is provided in Appendix A. As a result, there is no reason to suggest that the proposed bypass is preventing the construction of the 9 dwellings consented by planning permission 16/1006 and reserved matters approval 18/0724.	Noted, no further response is required.
	<b>Comments on SoCG:</b>	
REP3-017.8	For the reasons given in section 1 above, the Council considers that its suggested change identified in point 10 of FBC’s schedule of amendments to the dDCO (p. 43 of the SoCG) is no longer necessary. However, FBC considers that other amendments are needed to Schedule 2, Part 1, Requirement 9 of the dDCO to deal with the observations made by LCC in its response to ExQ1 question 1.4.1.	The Applicant has discussed this matter with Fylde and agreed that this matter should be taken forward with LCC.
	<b>Comments on Applicant’s first revised draft DCO:</b>	
REP3-017.9	FBC notes that Revision 2 of the dDCO (dated May 2019) does not incorporate any of the changes suggested in the Council’s deadline 2 submissions – specifically those identified in points 1 – 12 of the SoCG. It is, however, acknowledged that the Applicant would not have been aware of the Council’s suggestions in its deadline 2 submissions at the time of preparing dDCO Rev 2. Nevertheless, FBC would take this opportunity to re-iterate its views concerning the need for amendments and additions to dDCO Rev 2 as identified in the SoCG (though incorporating its updated comments with respect to point 10 as highlighted in sections 1 and 2 above).	The Applicant and Fylde Borough Council have now agreed a SoCG and the proposed amendments to the dDCO, REAC and CEMP are outlined within the document (document reference TR010035/APP/8.5 – Rev 1).
<b>REP3-018</b>	<b>Marine Management Organisation</b>	
REP3-018.1	Of the items Deadline 3 consists of, the MMO considers the following relevant for inclusion in this response: <ul style="list-style-type: none"> <li>• Comments on Written Representations</li> <li>• Comments on Statements of Common Ground (SoCG)</li> </ul>	Noted, no further response required.

Reference Number	Comment from Written Representation	Response to Written Representation
	• Comments on Applicant's first revised draft DCO	
	<b>Comments on Written Representation and Statements of Common Ground.</b>	
REP3-018.2	The MMO has reviewed the Written Representations and Statements of Common Ground (SoCG) submitted under deadline 2.	Noted, no further response required.
REP3-018.3	The MMO notes that, within their written representation, Natural England have agreed with the conclusions presented within the Marine Conservation Zone screening assessment. The MMO is also now content, having previously agreed with the conclusions in principle, pending Natural England's agreement.	Noted, no further response required.
REP3-018.4	The Applicant and ExA should note that the MMO have deferred to Natural England on the matters of bird mitigation strategy and HRA.	Noted, no further response required.
REP3-018.5	The MMO wishes to highlight that should any of the discussions held under 2.3 require mitigation measures to be secured via the Deemed Marine Licence then further engagement between MMO and the Applicant would be required.	Noted, no further response required.
	<b>Comments on Applicant's first revised draft DCO</b>	
REP3-018.6	The MMO has reviewed the updated draft DCO submitted by the Applicant, in particular the draft Deemed Marine Licence (DML) in light of changes agreed in principle during SoCG discussions with the Applicant.	Noted, no further response required.
REP3-018.7	The applicant has included reference to the relevant local MMO office. However this has yet to be defined within section 1. The MMO would expect to see this defined as follows: "MMO Office, Lutra house, Dodd Way, Walton Summit, Lancashire, PR5 8BX"	The Applicant confirms that this change will be included in the next draft of the dDCO.
REP3-018.8	The MMO notes that Part 2 Section 4 (a)iii now states 'Any works ancillary to these works' as agreed. This ensures that the DML applies only to the works activities associated with Horsebridge Dyke, as set out under Part Section 4 a(ii).	Noted, no further response required.
REP3-018.9	The MMO notes that Part 2 Section 4 (b) is intended to contain co-ordinates for the works, which have been reviewed and agreed between the MMO and the Applicant, However the co-ordinates were not included in the amended draft DML.	The Applicant confirms that the coordinates will be included in the next draft of the dDCO.
	<b>Other Matters to Note</b>	
REP3-018.10	The MMO is unable to agree all matters under the updated Statement of Common Ground, until the matters as discussed in section 4 have been addressed.	Noted, no further response required.
<b>REP3-019</b>	<b>Natural England</b>	
	<b>Matters that must be secured by requirements in the DCO</b>	
REP3-019.1	As mentioned in paragraph 3.14.4 of our written representations, for European Protected Species (namely bats and great crested newt): The relevant surveys and resulting licensed mitigation measures addressed through the license application process will need to be integrated into the scheme's wider habitat related measures and secured by a suitably worded Requirement. Details of any mitigation and management measures will need to be captured in the scheme design drawing shown on the works plans and any management contracts agreed.	Revision 2 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) has been updated to include a commitment for an endoscopic survey prior to demolition of Skippool Bridge. In addition, Revision 2 of the Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 2) has been updated to include fewer but larger hibernacula and refugia and all newt fencing has been removed following discussions with Natural England. The Record of Environmental Actions and Commitments is secured by Requirement 4 in the dDCO and the Environmental Masterplan secured by Requirement 5. Revision 2 of the Record of Environmental Actions and Commitments and Environmental Masterplan will be submitted at Deadline 4.
REP3-019.2	As mentioned in paragraph 3.14.5 of our written representations, a Requirement should be added under Schedule 2, for an Agricultural Land Classification (ALC) survey to be undertaken prior to construction works commencing and that survey should be submitted to Natural England for comment before the Requirement is	A Requirement in the terms sought by Natural England is not needed because commitment 6G of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) requires the ALC survey to be undertaken. The REAC is itself

Reference Number	Comment from Written Representation	Response to Written Representation
	discharged.	secured through Requirement 4 of the dDCO.
REP3-019.3	As mentioned in paragraph 3.14.6 of our written representations, an additional Requirement should be added under Schedule 2 for the creation of a soil mitigation plan (as per the 2 of 3 National Policy Statement for National Networks paragraph 5.179). This should be produced following the completion of the ALC and soil surveys and submitted to Natural England for comment before the Requirement is discharged. If found acceptable, the project should proceed in accordance with the approved mitigation.	Requirement 4 of the dDCO already requires a soil mitigation plan to be prepared. Revision 3 of the dDCO (document reference TR010035/APP3.1) to be submitted at Deadline 5 will include Natural England to be consulted as part of the discharge of Requirement 4.
REP3-019.4	An additional Requirement should be added to require an endoscope survey of Skippool Bridge (B5) prior to demolition (when bats are likely to be active). This survey would comprise (as a minimum), an endoscope survey of all the features having some potential to be used by bats, more likely in an opportunistic manner. If the results of the survey show bats are present and a protected species licence is required, further survey work would be required and subsequently sufficient mitigation and compensation measures will need to be provided. This could be included in Schedule 2, Part 1 Requirements, 7. Protected Species.	Revision 2 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) has been updated to secure the need for an endoscopic survey prior to demolition of Skippool Bridge. Revision 2 of the Record of Environmental Actions and Commitments will be submitted at Deadline 4.
REP3-019.5	There may be further additions to Schedule 2, Part 1 Requirements, 7. Protected Species once the great crested newt mitigation has been agreed.	Noted, no further response required.
REP3-019.6	As mentioned in paragraph 3.14.8 of our written representations, and referring to paragraph 7.4.16 in the Habitats Regulations Assessment (HRA) (Volume 5, May 2019, Rev 2) and reference 4AL of the Record of Environmental Actions and Commitments (REAC) (Volume 7, May 2019, Rev 1), a Requirement should be added to clarify the currently agreed arrangements for night time working and should any additional night time working be required throughout the winter period (1 October to 31 March inclusive), this should only be carried out with full, prior agreement with the LPA and Natural England. This Requirement could be included under Schedule 2, Part 1, 4.(2)(c),	A Requirement in the terms sought by Natural England is not needed because commitment 4AL of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) secures the need to seek agreement with the LPA and Natural England in the event of any additional night-time working being required throughout the winter period. The Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 2) will further regulate night-time working.
	<b>General comments on the draft DCO.</b>	
REP3-019.7	As mentioned in paragraph 3.15.3 of our written representations, Under Schedule 2, Part 1, 4.(2)(d), we consider that more detail is needed, in particular, for the plans which haven't yet been written eg: When each plan should be finalised, and agreed before,  Details around what the plan should contain (could include some of the detail included in the REAC),  Details of any additional requirements as a result of the plan ie. consultation with Natural England to agree management strategy.	Section 1.2 within the Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 2) and part 1 of the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) provide detail regarding the contents of the environmental control plans not yet written. The dDCO secures the commitments and the contents within the Outline Construction Environmental Management Plan and Record of Environmental Actions and Commitments within Requirement 4 of the dDCO.  Refer to the response to REP3-019.3 above.
REP3-019.8	As mentioned in paragraph 3.15.4 of our written representations, we note the commitment to producing a Soil Resource Plan as part of the Outline CEMP, which is already included in the draft DCO under Schedule 2, Part 1, 4.(2)(d), however as already mentioned in the paragraph above, more detail should be included within the Requirement to say that the Plan should be written prior to construction and submitted to Natural England for comment before the Requirement is discharged.	Refer to the response to REP3-019.3 above
REP3-019.9	Under Schedule 2, Part 1, 7. Protected Species, under paragraph (2), there is a missing word, underlined below: '(2) <u>The undertaker must prepare a written scheme for the protection and mitigation measures for any protected species specified..</u> '	The Applicant confirms that this correction will be included in the next draft of the dDCO to be submitted at Deadline 5.



Reference Number	Comment from Written Representation	Response to Written Representation
REP3-019.10	Under Schedule 2, Part 1, 1. Interpretation, the reference numbers quoted are wrong (see below) and the legislation now needs to be listed 'as amended': 3 of 3 <i>“European protected species” has the same meaning as in regulation 40 42 (European protected species of animals) and 44 46 (European protected species of plants) of the Conservation of Habitats and Species Regulations 2017 (as amended) (b);</i>	The Applicant confirms that this change will be included in the next draft of the dDCO to be submitted at Deadline 5.
<b>REP3-020</b>	<b>Network Rail</b>	
REP3-020.1	Network Rail has no comments to make.	Noted
<b>REP3-021</b>	<b>Cllr Alf L Clempson</b>	
REP3-021.1	I have been fighting development in the Poulton area for over 6 years now, this has been difficult due, as you know to national policy. While I encourage improvements to the highway infrastructure, I must also point out the pressures the new road may put on Poulton. I have argued many, many times that Poulton just cannot cope with current levels of traffic due to unsustainable development being passed. Right now as I write this, I have been contacted by several residents who are stuck in traffic on Amounderness Way, Mains Lane and Breck Road in Poulton due to temporary traffic lights near the River Wyre public House. Indeed the que of traffic goes all the way to Windy Harbour and this is for one set of temp traffic lights, please do not misunderstand I know these things must happen but when one road like this is blocked in this area the impact is much greater than in other areas due to the location and lack of alternative routes. Many from outside this area have no idea how the traffic situation in and around Poulton has deteriorated in the last few years and, that often if one of the main routes is closed or blocked for some reason which is often the case due to increasing traffic volumes then the impact on the wider network is severe. Please remember Poulton has the only railway station in Wyre, severe parking issues, outstanding schools with pupils attending from far and wide, busy supermarkets in the town centre and is a bustling town used as a shortcut on the Fylde Coast.	The Applicant notes the concerns raised by Cllr Clempson and confirms that the impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in the Scheme Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) Appendices F and H. The Paramics model (a microsimulation traffic model used for the operational assessments) area covers Poulton-Le-Fylde.
REP3-021.2	Many believe that with the introduction of the new road will bring additional chaos and danger to Poulton. In my letter attached I talk about the Fairfield Road access to Poulton which many more people will use in order to avoid this relief road. I have recently raised concerns about serious accidents on this stretch of Road and this continues to concern me greatly. Another major point in the letter attached is that this road has been used in the past as a condition to pass major development and has been taken into consideration when important planning decisions have been made. In the case of the major development currently being built on Garstang Road East, the major concern was the lights at singleton and the promise of improvements but, now it seems that these lights will be replace with similar lights and in fact more sets of lights, this has the potential with additional development to worsen the situation, not improve it.	Refer to response provided to REP3-021.11 and REP3-021.13 below.
REP3-021.3	In general I am astounded that Highways England have had very little consultation with residents and when they say they have carried out the minimum, I have questioned this throughout the process and would comment that they have certainly been pushed to consult any less. I am also concerned that they just do not understand the issues in this area and have consistently not listened and while I know normally they just push forward with very little thought for the local community, the impact this could have on safety in Poulton concerns me greatly.	Refer to response provided to 1.6.1 in Responses to the Examining Authority's Written Questions (document reference TR010035/APP/7.10) which outlines the timeline of engagement and consultation. In addition to ongoing dialogue and engagement, the Applicant carried out formal non-statutory and statutory consultation in accordance with the requirements of the Planning Act 2008. Further details of the consultation undertaken can be found in the Consultation Report (document reference TR010035/APP/5.1). The report further sets out how the Applicant had regard to consultation responses in the design of the Scheme.
REP3-021.4	Unfortunately despite my efforts LCC Highways still also underestimate the severe	The Applicant has held ongoing discussions with the Local Highway Authority (LCC) in terms

Reference Number	Comment from Written Representation	Response to Written Representation
	traffic situation in and around Poulton although they do understand it better than HE.	of traffic within Poulton.
REP3-021.5	While I cannot and will not stand in the way of improving the highway infrastructure, I have many questions and concerns about this scheme and the impact it could have on the town of Poulton-le-Fylde. Simply, not enough work has been carried out by any party to prove this scheme will have a positive effect on the local highway infrastructure and not enough work has been carried out to prove that this scheme will not have a negative effect on safety in Poulton.	Refer to response provided to REP3-21.1 above.
REP3-021.6	I refer to our conversation the other day outside the Vicarage Park Community Centre when you asked me to put my concerns surrounding the above scheme in an email to you. I have lived at the end (Redacted) by (Redacted) sine 1979. I do not oppose the scheme in principle because something needs to be done about the increasing traffic volumes. However, there is no doubt in my mind that the effect upon my property will be serious and significant. Highways England are seeking to purchase a small piece of my land and while some of these issues may be able to be addressed in compensation terms, it seems to me that the Scheme needs to incorporate specific measures to ameliorate and mitigate the worst effects from the widening of Breck Road, and the replacement of the roundabout with traffic lights, causing idling engines, interruption of the flow of traffic and a build up of stationery vehicles both on Amounderness Way and Breck Road.	Refer to response to RR-005 in Comments on Relevant Representations (document reference TR010035/APP/7.9)
REP3-021.7	Firstly, a good solid sound limiting fence or barrier (with vegetation and plants) needs to be erected along the Northern boundary of my property and also along the top of the embankment which rises from Horsebridge Dyke to Breck Road	Refer to response REP2-058.6 in Comments on Written Representations (document reference TR010035/APP/7.18)
REP3-021.8	Secondly, something needs to be done to improve the dangerous slope and embankment from Breck Rad to Horsebridge Dyke. The scheme envisages the replacement of a new culvert from the River Wyre into the dyke. Again I do not oppose this but the flow is tidal and can run very fast. I question whether the present dyke (which forms at this point my Easterly boundary and is itself some forty years old) can cope with a new culvert from the River Wyre. In an ideal world the dyke at this point should be routed underground and it would, in my view, be an ideal opportunity for this to be undertaken while the improvement scheme is being effected. However, no one accepts responsibility for the steep slope (I cannot believe that it would not rest with LCC and/or the Environment Agency.)	Refer to response REP2-058.6 in Comments on Written Representations (document reference TR010035/APP/7.18)
REP3-021.9	Thirdly, there will still be a continual traffic flow along Breck Road, making it dangerous and difficult for pedestrians (especially the elderly) to cross between my house and the Civic Centre junction. The School crossing patrols for Breck School, and for St Johns assist when Schools emerge but there continues to be a need, in my view, for at least one controlled pedestrian crossing between my house and the Civic Centre	The modified Skippool junction will have provision for signal-controlled crossing points. Further along Breck Road is outside the remit of Highways England and is the responsibility of Local Highway Authority, Lancashire County Council.
REP3-021.10	I am aware how busy you are, but thank you for reading this email. If at any time you care to pop down, I can show you at first hand my concerns. You can always ring me, text me or email me to ensure I am in.	Noted, no further response required.
REP3-021.11	Before the development was started on Garstang Road East and as part of the HE consultation I submitted an alternative plan for the relief road which was rejected by HE without taking it fully into consideration. Without going into great detail my alternative would have acted as a real by-pass for Poulton and would have relieved traffic through the town this proposal from HE will not. When I asked HE to consider the impact on Poulton and asked them to take the highway pressures of Poulton into consideration, they informed me that HE were only interested in the A585 and LCC	<p>The proposal provided during non-statutory consultation was assessed (refer to Section 5.9 in Appendix M of the Consultation Report (document reference TR010035/APP/5.1) and was rejected for the following reasons;</p> <ul style="list-style-type: none"> <li>• It would require two additional crossings of Main Dyke and would intersect more of the Main Dyke flood plain;</li> <li>• It would pass through land that was currently the subject of a planning application</li> </ul>

Reference Number	Comment from Written Representation	Response to Written Representation
	<p>were responsible for highways in Poulton. I believe this to be very short sighted and a missed opportunity to improve congestion through the town.</p>	<p>(Wyre 15-00298) for the development of 525 houses. Note that this planning application was granted, and construction has commenced.</p> <ul style="list-style-type: none"> <li>• It would require the demolition of a number of houses on the south side of Garstang Road East</li> <li>• It would have a significant effect on the Poulton Industrial Estate requiring the demolition of at least a dozen industrial units and would disrupt the internal road network of the estate potentially resulting in significant adverse effects to the local economy;</li> <li>• Without providing a further junction south-east of the industrial estate it would be difficult to allow for the aspirations of Fylde Borough Council to extend the industrial estate southwards;</li> <li>• The proposed route would be much closer to houses in Little Poulton</li> <li>• The proposed route would be approximately 0.6km longer than that of the Scheme measured between Skippool Bridge Junction and Lodge Lane. This would typically add about 20 seconds to the journey time that would adversely affect the economic case for the scheme.</li> </ul>
<p>REP3-021.12</p>	<p>At the present time Skippool roundabout forms an attractive local landmark and a well-known entrance to the town. This will be replaced by tarmac and lights and I am not convinced this will improve accessibility to the town because putting it simply while HE did the minimum consultation they did not carry out enough background work.</p>	<p>Refer to responses to REP3-021.3 and REP3-021.9 above.</p>
<p>REP3-021.13</p>	<p>I believe the HE have greatly under estimated traffic traveling through Poulton and not enough work has gone into assessing it. In truth despite my efforts even LCC continue to underestimate the worsening traffic situation in Poulton. As stated in the recent email from LCC Highways "Most of the route lies within Fylde West division but small parts of the route also lie within your division". This is another indication that LCC Highways just do not understand the pressures Poulton faces and yes while most of the new road is outside my division, the impact will be devastating and add to the already dangerous, congested highway system in the town. The fact is many commuters, delivery drivers etc use the Fairfield Road B5266 to access Poulton in order to avoid the congested roads in the town, this practice will continue. Measures must be taken to stop this but because this is not the responsibility of HE this has not been considered and no joint working with LCC has taken place.</p>	<p>The traffic modelling has shown small increases in traffic through Singleton village in the AM peak period however at all other time the traffic reduces and therefore there should be limited impact along Fairfield Road B5266.</p>
<p>REP3-021.14</p>	<p>The Garstang Road East Development was passed with the condition that the lights at singleton would be improved but instead lights are now being installed at the Poulton Junction which has the potential to cause the same delays as the Singleton lights did. The whole basis of the development being passed now has to be questioned.</p>	<p>A roundabout was originally assessed at Poulton junction during Preliminary Design as it allowed potential future provision of a fifth arm to serve a possible development to the southwest of the junction but the operational assessment (presented in Combined Modelling and Appraisal Report Appendix H document reference TR010035/APP/7.12) concluded that the roundabout was over capacity on the A586 approaches in the design year (2037). The development opportunity would therefore no longer exist considering the overall saturation of the junction however it was noted that a T junction adjacent to Poulton junction could be introduced if a development were promoted in the future. A change of junction configuration was also necessitated by the feedback received during the consultation to provide an improved crossing point for pedestrians and cyclists on the A586. Several alternative junction arrangements were tested:</p> <ol style="list-style-type: none"> <li>1. Small roundabout (existing)</li> <li>2. Large standard roundabout</li> <li>3. Non-standard roundabout (signalised)</li> <li>4. Large standard roundabout (signalised)</li> </ol>

Reference Number	Comment from Written Representation	Response to Written Representation
		<p>5. Fully signalised crossroads            The Applicant concluded that the signalised crossroads was the best performing junction arrangement as it was more advantageous in terms of reserve capacity and resilience to increased demand.</p>
REP3-021.15	<p>It has not been proved if this scheme will improve traffic flow at all and due to the lack of real consultation and the many unanswered questions that remain, I have to question the whole scheme. HE had the opportunity to make a real difference for the better to the traffic situation in Poulton and they fell short. I believe this scheme has been a desk top exercise which has not been fully thought through. There are many unanswered questions such as, the actual locations of the traffic lights, will there be a cycleway the whole length of the carriageway?</p>	<p>As presented in the Planning Statement and National Policy Accordance (TR010035/App/7.1) a Scheme objective is to improve journey time reliability by reducing congestion. A quantified appraisal of improved journey time reliability derived from improved user confidence in the reliability of journey times due to the Scheme has been undertaken. The benefit values on the reduction in the variability of journey times due to the Scheme is calculated to be a journey time reliability benefit of £22.3 million. This quantification is explained in detail in the Combined Modelling and Appraisal Report Appendix G Section 9 (TR010035/APP/7.12). The Consultation Report (document reference TR010035/APP/5.1) sets out how the Applicant has adhered to the statutory consultation requirements and also provided a non-statutory consultation.            Traffic light positions are shown on the General Arrangement Plans (document reference TR010035/APP/2.5).            A cycleway will not be provided along the new section of bypass, a dedicated combined footway/cycleway will be provided along Mains Lane providing non motorised users the quickest route and separating them from the main traffic on the bypass. The proposed footway/cycleways are shown on the Streets, Rights of Way and Access Plans (document reference TR010035/APP/2.4)</p>
REP3-021.16	<p>How will the new offices and garage by Skippool be accessed and exited?</p>	<p>Accesses will be maintained for both Key Worker Homes' offices and Skippool Service Station, however traffic travelling in a westerly and easterly direction would be required to undertake a U turn at the junction respectively.</p>
REP3-021.17	<p>Will access to the River Wyre pub be maintained and how?</p>	<p>Access will be maintained from the western side of Old Breck Road/Service Road adjoining Breck Road. The access and egress will be provided by a set of traffic signals.</p>
REP3-021.18	<p>Basically residents in the area are afraid of the potential impact because there are too many unanswered questions and grey areas and this is due to HE's approach to this project. Myself and C/Cllr Shedwick have a meeting scheduled with HE in June and I hope to find out more then and I strongly suggest that LCC Highways carry out more work to assess the impact of this road on Poulton because very much like their approach seems to be with the proposed works to the Norcross Roundabout, HE are going to steam in, carry out the works without assessing the massive potential impact.</p>	<p>The Applicant met with Cllr Alf Clempson on 10/06/2019 where these queries were discussed, and ongoing discussions are being held with LCC to address any concerns on the local road network. Cllr Alf Clempson's concerns regarding Norcross junction improvements were passed on to the Highways England's Asset Renewal team.</p>
REP3-021.19	<p>Please remember I have limited my comments to Poulton and the input the new road will have on the town, I am sure there are issues with other areas as well.</p>	<p>The Transport Assessment (document reference TR010035/APP/7.4) covers a wide area, focusing on the road network to the north of the M55 and to the west of the M6, including the principal settlements as shown in Figure 3.9 of Section 3 of the Transport Assessment.</p>
<b>REP3-022</b>	<b>Cllr Lesley McKay</b>	
REP3-022.1	<p>I wish to give my full support and endorsement to the comments previously submitted by Mr John Bailie.</p>	<p>Refer to response in REP3-023 below.</p>
<b>REP3-023</b>	<b>Duchy of Lancaster</b>	
REP3-023.1	<p>The Duchy of Lancaster has a freehold interest in the mines and minerals in various plots of land proposed to be subject to compulsory acquisition or temporary possession pursuant to the Order. Such land is accordingly Crown land for the purposes of the <i>Planning Act 2008</i> ("the 2008 Act").            As you will be aware, section 135 of the 2008 Act states that a Development Consent Order may only authorise the compulsory acquisition of an interest in Crown land if it</p>	<p>Noted, ExQ1.1.7 Crown Land And Consent has been updated for Deadline 4 accordingly (document reference TR010035/APP/7.17).</p>

Reference Number	Comment from Written Representation	Response to Written Representation
	<p>is an interest which is for the time being held by someone other than the Crown and the appropriate Crown authority consents to the acquisition. The 2008 Act further provides that a Development Consent Order may only include any other provision in relation to Crown land or rights benefiting the Crown with the consent of the appropriate Crown authority.</p> <p>The purpose of this letter is to inform the Planning Inspectorate that, in accordance with section 277(5)(d), the Chancellor of the Duchy of Lancaster consents, for the purposes of section 135(1) and 135(2) of the 2008 Act, to the acquisition, temporary possession and/or use of the Crown land and rights as proposed in the application for the Order.</p>	
<b>REP3-024</b>	<b>John Bailie</b>	
REP3-024.1	Deadline 2 date was 17 May. Deadline 3 date, by which time comments on Deadline 2 submissions had to be received, is 31 May (today).	Noted, no further response required.
REP3-024.2	<p>Deadline 2 submissions were only placed on Planning Inspectorate website late on Wednesday 22 May.</p> <p>Taking into account the Bank Holiday this gave just six full days in which to comment on the Deadline 2 submissions which included 53 large files from the Highways Agency.</p> <p>As it is impossible to examine all those submissions in detail within that limited time scale, I refer to my Deadline 2 submission and would emphasise my particular concern regarding the ability / necessity for traffic to carry out U-turns (which involve negotiating around traffic islands) at the Skippool and Skippool Bridge Junctions.</p>	<p>Timescales are set by the ExA and Planning Inspectorate.</p> <p>Refer to responses provided to REP2-056.10 and REP2-056.11 in Comments on Written Representations (document reference TR010035/APP/7.18).</p>
REP3-024.3	<p>It is acknowledged that occasional delays are encountered at the not unattractive Skippool roundabout but traffic does at least flow “around” it.</p> <p>These particularly complex junctions, necessitating the demolition of several properties and the destruction of trees and hedgerows, to be replaced by oceans of tarmac and forests of traffic signals combined with the ability to execute these convoluted U-turns, will not only interrupt traffic flows and create more congestion and pollution but will visually create an eyesore at what is a landmark approach to the town of Poulton-le-Fylde and the approaches to Thornton</p>	<p>From the traffic modelling undertaken it was found that the existing roundabout junction had insufficient capacity and therefore the junction is required to be modified, which will also allow for future growth.</p> <p>There are only 2 properties proposed to be demolished as part of the Scheme as stated in Environmental Statement Chapter 2: Description of the Scheme (document reference TR010035/APP/6.2). The removal of hedgerows and protected trees is limited to where it is necessary, as shown on the Hedgerows and Protected Trees to be Removed Plans (document reference TR010035/APP/2.10). In addition, the Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 2) shows that significant numbers of trees and hedgerows would be planted.</p> <p>At Skippool and Skippool Bridge junction the queue length results from the modelling show that the queues slightly exceed the maximum expected free-flow queue length. However, the queues occur only briefly and clear within each cycle of the traffic lights. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays.</p> <p>Environmental Statement Chapter 6: Air Quality (document reference TR010035/APP/6.6) presents an assessment based on detailed air quality modelling which was undertaken for a number of worst-case receptor locations, including properties close to the Scheme. All predicted air quality concentrations at these locations were below the respective air quality objectives, and the assessment determined that the Scheme would not have a significant effect on local air quality.</p>

Reference Number	Comment from Written Representation	Response to Written Representation
		The junction improvements would have a negligible effect on road traffic noise in this area due to these levels being mitigated to a minimum and below a level where significant adverse effects on health would occur through the use of low noise surfacing on the proposed new junction alignment. No effects as a result of vibration are anticipated during operation. Please refer to Figures 11.5 and 11.6 in the Environmental Statement Chapter 11: Noise and Vibration (document reference TR010035/APP/6.11).
REP3-024.4	As has been identified by LCC, traffic on the existing Garstang Road towards Poulton is likely to increase by up to 49% at peak times. Furthermore, traffic on Lodge Lane through Singleton village will also increase.	Refer to response given to 16.1 in Comments on Local Impact Reports (document reference TR010035/APP/7.19).
REP3-024.5	The proposed new road forms only 25% of the total route from M55 to Fleetwood. At each end it connects with existing congested single carriageway roads and involves convoluted zig zag approaches for traffic from Over Wyre and residences on Mains Lane.	Refer to response given to 16.1 in Comments on Local Impact Reports (document reference TR010035/APP/7.19).
<b>REP3-025</b>	<b>Paul D Dennis on behalf of R &amp; B Hargreaves</b>	
REP3-025.1	Thank you for your e-mail of 28th May. I note your comments and I will forward the comments to Highways England however we would be pleased to have the representation below to be considered by the examining authority. We are in a situation with this property where none of the property which is in my clients ownership is actually being acquired although this scheme sits on 3 sides of the property however we are concerned regarding the situation where land is being acquired over which are client has rights especially in respect of their septic tank etc. This also concerns acquisition for various areas where our clients have access rights.	The Applicant notes that land to be acquired sits on 2 sides of the property only. Refer to responses below in relation to septic tank and access.
REP3-025.2	We refer to the above and the representations which have previously been raised by our clients. We note that we have still had no substantive response to these representations. We believe that these are matters which can be dealt with any inquiry, however if we are unable to obtain a substantive response we would wish to raise these issues at the inquiry. In particular, our clients are concerned with the situation regarding the septic tank to their house. Their house is not being acquired for part of the scheme but the land where their septic tank is located is being acquired for the scheme for construction and we would therefore be pleased if you could give us an indication of what steps are being taken to address this.	The arrangements of the septic tank would be considered as part of the detailed design. Commitment 8X within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) secures mitigation measures for private water supplies. As required a detailed assessment of groundwater levels and flows shall be undertaken during detailed design to fully understand the location of the septic tank and any amendments would be agreed with the landowner.
REP3-025.3	We have also raised issues regarding our client's access and what works will be carried out in that area and we would be pleased to hear from you.	Refer to response to RR-014.3 in the Comments to Relevant Representations (document reference TR010035/APP/7.9).
<b>REP3-025</b>	<b>Matt Hodges</b>	
REP3-026.1	I attach a word document with comments on various new documents from Highways England published after Deadline 2. I recognise that this is a little late for Deadline 3 but as a One man part time volunteer it proved totally impractical for me to monitor all the documents from HE and others posted after deadline 2 during the holiday period. I therefore ask you to allow this late submission of comments on three of those documents.	Noted, no further response required.
	<b>Re. Application Document Ref: TR010035/APP/ 7.10 – Rev 0 Responses to the Examining Authority's Written Questions</b>	
REP3-026.2	In your Written Questions you asked:- "How does the scheme fit into any planned improvements for the A585 corridor from the M55 to Fleetwood, .... In their response (at page 45) Highways England referred to the junction improvements and the Cycle Routes: A585 – Fleetwood to West Drive; A585 – West	Noted, no further response required.

Reference Number	Comment from Written Representation	Response to Written Representation
	Drive to Thornton Roundabout (Morrisons); A585 – Thornton to Skippool.	
REP3-026.3	<p>These routes are intended to form a continuous route from Fleetwood to Skippool junction for cyclists and pedestrians as a shared path on the east side of the A585. This is not only to provide a safe and convenient route for cyclists and pedestrians but also to aid motor traffic flow by reducing the delays caused by the difficulty of safely overtaking cyclists who currently ride on the carriageway. To encourage cyclists to use these shared paths rather than the carriageway it is important that they are of high and consistent quality beside the A585 and with convenient crossings of side roads and major junctions so they are not significantly slower than using the carriageway. Without this cyclists will use the main carriageway as many do now. It is for this reason that it is important that this new section of the A585 should have a cycle and pedestrian facility along the east side all the way from Skippool to Windy Harbour Junction. If cyclists are directed to deviate away from the main road via Mains Lane and the closed off old road (which will soon become a mess when used for agricultural access) most cyclists will ride on the carriageway as is their legal right.</p>	<p>The design considerations for cyclists were that no specific provision would be made along the bypass due to: (1) High traffic speeds on the bypass, (2) Non-provision of lighting along most of the route (3) Alternative routes using the sections of roads to be bypassed form a more direct and quieter route between the local communities. The alternative routes proposed use parts of the existing road network to be bypassed and/or de-trunked. They are considered to adhere with the five design criteria described in IAN 195/16.</p>
REP3-026.4	<p>Future schemes will need to provide a continuation of the shared path on the east side of the A585 south from Windy Harbour to Thistleton, Esprick and the M55 J3. Cyclists can then continue to Kirkham on the LCC managed section of the A585.</p>	<p>Future schemes along the strategic road network will consider the use of a shared footway/cycleway accordingly.</p>
<p><b>Re Application Document Ref: TR010035/APP/8.2            Statement of Common Ground with Lancashire County Council</b></p>		
REP3-026.5	<p>On Page 32 I was appalled but not surprised to see "Lancashire County Council is satisfied that the proposed development is compatible with regional and local strategies to increase uptake and mode share for public transport, walking and cycling."</p>	<p>Noted, no further response required.</p>
REP3-026.6	<p>Living in a village from which Lancashire removed the bus service and cycling widely in Lancashire it is clear that Lancashire do not have a realistic strategy to increase uptake and mode share for public transport, walking and cycling. Outside town centres footways are totally neglected. Cycle facilities put in decades ago have been allowed to decay and many on road cycle lanes have been removed. But that is not an adequate reason to allow Highways England to fail to provide pedestrian and cycle facilities along their new main road.</p>	<p>A continued footway/cycleway will be provided along the route via Mains Lane which provides non-motorised users the shortest route between Skippool Junction and Windy Harbour Junction. Refer to the General Arrangement Plans (document reference TR010035/APP/7.5) and Street, Rights of Way and Access Plans (document reference TR010035/APP/7.4) for exact extents.</p>
REP3-026.7	<p>The failure of the plans to provide footway cycleway along the new road with cyclists and pedestrians being directed up the old road (which will soon become a neglected grot spot) and the diversion of the Lancaster Garstang Blackpool bus so it no longer serves Little Singleton will both have a serious impact on the uptake and mode share for public transport, walking and cycling. This is particularly important in view of the proposed major development in Great Eccleston which ought to result in more cycle commuting from there into Poulton, Amounderness and Blackpool. Cycle commuters will not use a route that is littered with muck from the agricultural access to the adjacent fields. Many women will not use a lonely route particularly in the dark winter evenings and will not want their children to use it.</p>	<p>The current road provides agricultural access to the adjacent fields along Garstang New Road and does not get "littered with muck", the road will be handed over to the responsibility of Lancashire County Council and will tie into their "Actively Moving Forward – Strategy". The Applicant is currently in discussion with Lancashire County Council on whether the current lighting would remain in place for the section of road between Little Singleton junction and Grange footbridge.</p>
REP3-026.8	<p>It is vitally important that Highways England should construct and maintain a quality pedestrian and cycle facility along their new road preferably with a DDA compliant link up to Lodge Lane. Directing pedestrians and cyclists up the closed off old road is not satisfactory to comply with the government's CWIS or their duties for "Cycle Proofing" the strategic road network. Every new road that is not a motorway should be suitable for pedestrians and cyclists and on a busy road like this adjacent pedestrian and cycle facilities are essential.</p>	<p>Highways England's document IAN 195/16 "Cycle Traffic and the Strategic Road Network" Section 2.1.1 – "Designing networks for cycle traffic" states:  <i>"Where all-purpose trunk roads are upgraded with new routes being provided, the original route corridor and adjoining local road network can provide a suitable opportunity for compensatory cycle route provision. In such instances, designers shall liaise with the appropriate local highway authority responsible for the original route once reclassified."</i></p>

Reference Number	Comment from Written Representation	Response to Written Representation
		<p>The proposed parts of the existing road network (A585) to be bypassed and/or de-trunked are considered to adhere with the five design criteria.            However, it is accepted that the alternative route from Skippool to Poulton industrial estate off Garstang Road East would be less direct than a route following the bypass.</p>
	<p><b>Re. Application Document Ref: TR010035/APP/ 7.19 – Rev 0            Comments on Local Impact Reports</b></p>	
<p>REP3-026.9</p>	<p>On page 12 at ref 16.8 it HE say:- “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>	<p>Noted, no further response required.</p>
<p>REP3-026.10</p>	<p>This response is totally incredible. There are three regular bus services that approach Little Singleton from Windy Harbour:            The 42 from Lancaster to Blackpool via Garstang with one bus an hour each way            The 76 Lytham to Blackpool with one bus every two hours            The 77 Preston to Blackpool with one bus an hour in the morning and early evening commuter times and every two hours between.            The only other services known to Google were two school specials each running one bus each way per day.            Eastbound busses would not need to stop the A585 traffic as they would enter via a slip lane. Westbound busses would need lights to stop the eastbound A585 traffic so this would amount to two interruptions per hour during the day plus one extra stop in the early evening. It is totally incredible that two short stops per hour of the eastbound A585 traffic would have any significant impact on the proposed journey time savings when the traffic will be stopped anyway at the nearby Windy Harbour lights every few minutes. It is quite clear that this is a facile excuse for not constructing a bus gate supported by Lancashire as they don't want to have to maintain the old road for busses. The loss of these services at Little Singleton will mean residents in that area including parts of Mains Lane will have no access to public transport for travel to Blackpool, Preston or Lancaster and villages between without a long walk along redesignated A586 Garstang Road East to beyond the Junction with the new road and this will also involve a four stage traffic controlled crossing of the new junction. This can be guaranteed to discourage the uptake of public transport.</p>	<p>The only potential loss of bus service would be to the number 42 as indicated in the Lancashire County Council's Local Impact Report and the number of users utilising this service at Little Singleton is very limited. Also within their Local Impact Report it states that “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.” Therefore there is not a complete loss of services at Little Singleton as inferred by Matt Hodges.            As Mr Hodges indicates, a bus junction, if provided – would only operate occasionally (maybe 3 or 4 times an hour). While it is accepted that this would have little effect on traffic flows on the bypass, the issue of road user safety has to be considered. Infrequent use of traffic signals could present a hazard as changes to the signals actuated by a bus may not be expected by users of the bypass resulting in the possibility of them passing through a red light and colliding with the bus.            In addition, there is a significant risk of abuse or misunderstanding for westbound traffic on the bypass who may believe the right turn lane facility for a bus was available for them also. In such an event, the traffic signals would not change for the non-bus users resulting in them either jumping the red light across the eastbound carriageway or having to rejoin the westbound lane from the right turn lane. Both those manoeuvres would be unexpected by other users of the bypass.            Similarly, there is a significant temptation for drivers to attempt to use the section of Garstang New Road from Little Singleton (maybe following a bus) to get to Windy Harbour Junction. While technology such as bus actuated rising bollards or bus gates can work, as this section of road would also be used by local farmers, cyclists and utilities companies, the effectiveness of the technology could be compromised by the other permitted users or failure of the technology. In any case, those technologies would be easily circumvented by motor cyclists who could join the bypass unexpectedly.</p>
<p><b>REP2-070</b></p>	<p><b>Lancashire County Council</b></p>	
<p>REP2-070.1</p>	<p>Question 1.4.1 (Archaeology) – The Romano – British settlement remains which have already been identified outside of the area covered by the draft DCO and noted in this question have been subject to a number of phases of archaeological works. These included a desk based assessment and walk over survey, geophysical survey, trial excavation and open area excavation. Whilst of medium value and archaeological interest, none of the remains found as part of those works was in the opinion of the County Council's archaeological advisor, of sufficient importance to merit inclusion in the Schedule of Monuments under the Ancient Monuments and Archaeological Areas</p>	<p>The Applicant does not consider an amendment to Requirement 9 as requested by LCC in its response to ExQ1 question 1.4.1 to be necessary. Whilst the Requirement only requires an approval of the written scheme of investigation, the Requirement goes on to state that the authorised development must be carried out in accordance with the approved scheme. This will ensure that any earth moving operations are carried out in a way and at a time which is not detrimental to any archaeological remains.</p>



Reference Number	Comment from Written Representation	Response to Written Representation
	<p>Act 1979 or to be otherwise preserved in situ at the expense of development. An alternative impact mitigation approach of 'preservation by record' was instead adopted and the relevant areas of remains, subject to archaeological investigation prior to development. There is no reason to suppose that any further elements of the same settlement site that might be affected by the proposed A585 road scheme would be of any higher value or significance and as such a similar approach to their investigation and impact mitigation appears appropriate. This approach appears to be adequately addressed by Requirement 9 of the DCO. However, it is considered that Requirement 9 should contain some wording such that any earth moving operations within any areas of interest identified in the scheme of investigation are not commenced until such time as the investigation works have been completed. At present, Requirement 9 only appears to prevent commencement until such time as the scheme has been approved. If the Examining Authority has any further questions in relation to the operation of Requirement 9, the County Council would be happy to advise.</p>	
REP2-070.2	<p>The County Council notes that the Examining Authority have raised a number of other questions relating to impact on heritage assets (questions 1.4.2 and 1.4.3). Although these questions have not been specifically directed at the County Council, they are issues that have been commented on in its local impact report and fall within the area of expertise of the County Council's Historic Environment Service.</p>	<p>Noted, no further response required.</p>
REP2-070.3	<p>In relation to question 1.4.2, Barnfield Manor, Lodge Farm Cottage and Singleton Lodge pre date 1847 and have been converted from a former farmhouse and associated farm buildings. Singleton Hall and the associated North and South Lodges, Ice House, Grotto and Coach House was constructed as a large country house in the early 1870's. Manor House was constructed in the later 20<sup>th</sup> century within the former kitchen garden to Singleton Park. Of this group of buildings, only the Ice House has been considered worthy of designation as a listed building. The associated landscaped park was recommended for consideration for inclusion in the Register of Historic Parks and Gardens in 1998, but this was never confirmed by English Heritage and it remains undesignated. Despite this lack of designation, the buildings and park are of some local heritage value and some mitigation is justified.</p>	<p>Mitigation proposed within the Record of Environmental Actions and Commitments (document reference TR010035/APP/7.3 – Rev 2) and the Environmental Masterplan (document reference TR010035/APP/6.19 – Rev 2) are considered to be proportionate to the impact and significance of heritage assets in this location, of which only the Ice House has been identified as receiving a negative adverse impact from the Scheme and is the only designated heritage asset (refer to Environmental Statement Chapter 7: Cultural Heritage (document reference TR010035/APP/6.7 – Rev 1). Mitigation in the form of woodland planting has been proposed to reduce impacts to setting of the assets (refer to the Environmental Masterplan) and agreed with Historic England. Properties within this cluster of buildings would also benefit from additional tree planting and an acoustic barrier between their locations and the operational Scheme (refer to the Environmental Masterplan).</p>
REP2-070.4	<p>As a country house, it would not have been intended as a site for the general public and the surrounding park would have provided a buffer and assurance of privacy for the occupiers and guests. As such the establishment of more public access to the area does not support their original design or purpose, but does allow for a wider appreciation of both the historic landscape and buildings, common to many such historic properties and associated grounds. Consequently, the County Council would not object to such proposals.</p>	<p>Noted, no further response required.</p>
REP2-070.5	<p>In relation to question 1.4.3, the original design for this complex of buildings would have included a boundary wall backed by areas of planting. Barnfield Manor, as a former farm building, would not have originally benefitted from such screening but may have acquired it at the time the park was established. The Manor, built in the former kitchen garden, would have also originally benefitted from a surrounding wall. As noted in the question, the local vernacular for such boundaries was generally red brick walls (although cobble and brick or stone can be found on some sites) although only the kitchen garden wall would have been as high as 2 metres. Given the historic setting, it may be appropriate for the screening in this location to be provided by a brick wall rather than a wooden fence with a modern design.</p>	<p>Commitment 7L within Revision 2 of the Record of Environmental Actions and Commitments has been updated to state '<i>Prior to construction commencing, FBC will be consulted about the siting, design, materials and finish of the 2m high acoustic barrier required adjacent to the Singleton Hall access road. Any consultation response shall inform the detailed design of the barrier</i>'. Refer to the updated Record of Environmental Actions and Commitments -Rev 2 (document reference TR010035/APP/7.3) issued at Deadline 4.</p>

Reference Number	Comment from Written Representation	Response to Written Representation
REP2-070.6	Question 1.6.1 Transportation and traffic: The County Council notes the Examining Authority's questions in relation to these matters, particularly the relationship with the other transport schemes that have been proposed in this area. These matters are addressed in sections 5 and 6 of the County Council's Local impact Report. However, if there are outstanding questions, the County Council would be happy to provide a further response to assist the Examining Authority.	The Applicant is in ongoing discussions with Lancashire County Council to close out any queries they have on transport and traffic.
REP2-070.7	Accompanied site inspection: The County Council notes the locations that have been listed for the accompanied site inspection. It is considered that this list is generally acceptable but consideration should also be given to including the site of the proposed Grange footbridge to enable an appreciation of the scale and likely impact of the proposed structure.	Noted. However, following a decision by the ExA, the location of the proposed Grange Footbridge was removed from the ASI.
REP2-070.8	Issue Specific Hearings: The County Council notes the Examining Authority's request for interested parties to identify the matters that they would wish to raise at any issue specific hearing. The County Council has raised a number of issues in its local impact report. However, it is satisfied on the majority of those issues that the County Council's concerns are fully explained in its report and that it will not be necessary to repeat these through a hearing session. However, the Examining Authority will note that a large number of issues have been raised in relation to traffic modelling and detailed junction design. The County Council is hopeful that these issues can be resolved through further meetings and discussion with the applicant. However, if this is not possible or successful, the County Council would wish to reserve the option to further discuss these issues as part of an issue specific hearing.	The Applicant is in ongoing discussions with Lancashire County Council to close out any queries they have on traffic modelling and detailed junction design.

*Page left intentionally blank*