

From: [REDACTED]
To: [A585 Windy Harbour to Skippool](#)
Subject: Submissions on behalf of FREE
Date: 12 July 2019 18:12:32
Attachments: [REDACTED]

Please find attached a letter for consideration by the Inspectorate.

This comprises a submission of today's date and a copy of an earlier letter dated 27th June (no reply or acknowledgement yet received).

Please address all replies to [REDACTED]

Andrew Eastham
- Authorised for F.R.E.E.

Andrew Eastham

Legal Consultancy Services

1 Holly Court
Hardhorn Road
Poulton-le-Fylde
FY6 7SR

Tel: 01253 540740 or


By email only to
A585WindyHarbourtoSkippool@planninginspectorate.gov.uk

Your reference TR010035
Our reference (as an interested party) 20021754

12th July 2019

Dear Sirs,

**A585 Windy Harbour to Skippool Improvement Scheme
and
5.2 Flood Risk Assessment (REP2 – 024)**

We refer to our letter of 27th June (copy attached) to which we have received neither acknowledgement or reply.

Since that letter was sent there has been a further meeting at which FREE's Mr Greenwood was in attendance and spoke. He reports that it appears that the comments then made were acknowledged and would be properly considered.

The meeting centred on the proposed A585 road scheme and Mr Greenwood's representations focused on traffic flow and the comparative effect of roundabouts with manually controlled crossing signals as opposed to programmed crossing signals.

It remains the view of our client that the better outcome – both as regards reducing cost and improving traffic flow would be to widen Garstang Road rather than to construct the suggested underpass, and to maintain manually controlled crossing signals rather than pre-programmed controls at pedestrian and cyclist crossing points.

As to the objections to the widening of Amounderness Way from Skippool to Norcross – Highways England suggest that there is insufficient space, but the A585 was widened at Bourne Way to form 4 lanes, and the available space at Norcross Road/Amounderness Way is no less than that at Bourne Way.

This is without making reference to Mr Greenwood's proposals as regards the changed design for the roundabout at Norcross Road/Amounderness Way.

However, the wider concerns of FREE relate to flooding (as was highlighted in our letter of 27th June).

It is the case (as we understand it) that flooding has, to some extent, been taken into consideration in the proposed layout of the road scheme at Skippool but it is our understanding that the height of floodwater AOD on which the scheme is currently based is some way below the level projected by the National Oceanography Centre.

Our letter of 27th June requested confirmation that the wider aspects of projected flooding had been fully considered in this A585 scheme and also sought information as to the basis on which the Arcadis report had been prepared.

FREE accepts that your current remit may not incorporate or extend to the "River Wyre/Fylde Coast" flood protection but it is, surely, inappropriate that the current scheme should be implemented without consideration of the projected flood levels and to the protections that would be provided by the Flood Barrier at the mouth of the River Wyre that is and has been the subject of FREE's previous representations.

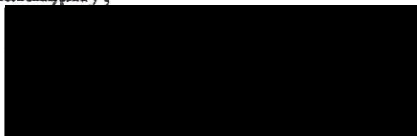
Please let us know, at your earliest convenience, what considerations have been given to those wider implications and to the protection of the north Fylde against those predicted floods.

In particular we consider that very great weight should be placed on the suggestion that flood prevention measures should be discounted in so far as they affect Thornton, Cleveleys and Fleetwood (page 47 item 9.1.8 of the Arcadis Flood Risk Assessment refers) in view of the fact that a suggested flood barrier at the mouth of the river can save property, businesses and infrastructure – assets with an estimated value of 0.5% of the cost of building the flood barriers.

It is not appropriate to burden this letter with further detail but your early response will be appreciated.

If you are not in a position to let us have that early response please let us know the timescale within which that might be expected.

Yours faithfully,



Andrew Eastham
(For and with the authority of FREE)

Andrew Eastham

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1 Holly Court
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Poulton-le-Fylde
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Tel 01253 540740


Your reference TR010035
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27th June 2019

Dear Sirs,

**A585 Windy Harbour to Skippool Improvement Scheme
and
5.2 Flood Risk Assessment (REP2 – 024)**

Please note that we have been retained by the consortium "Fleetwood Renewable Energy Enterprise 2007" – ("FREE").

On their behalf reference is made to the above Flood Risk Assessment report REP2 - 024 which has given FREE much cause for concern as to its effectiveness and value for money.

There are a number of matters on which your prompt response and/or elucidation is requested.

1. The Assessment makes reference to suppliers and to advice given to Arcadis (this is referred to in Item 2.4 (Page 5) of the Assessment and appears to form the basis for that Assessment. Please provide the details of all suppliers of such information.
2. Please provide all information on which it was determined that flood mitigation for Thornton, Cleveleys and Fleetwood was determined to be unaffordable – page 47 of the report refers.
3. The Assessment states that in 100 years time the maximum height of river water at Skippool Junction of the road will be 6.6 metres AOD – at which time the report projects that there will be 100mm of water on the road. In this regard please provide the actual figures used in the compilation of the Assessment for each of the following:-
 - a. Current high tide levels;
 - b. Rising sea levels anticipated as a result of climate change; and
 - c. Tidal surge computation

In each case we have assumed that such figures have been used in allowing you to predict the 6.6m AOD figure referred to above.

4. Please explain and provide information as to how the height of the sea defences along the River Wyre compare to those used in the Netherlands to defend against anticipated rises in sea levels due to climate change.
5. On what basis has the determination been reached that fluvial flooding is sufficient to deal with two months rain falling in two days?
6. As you know, FREE is strongly in favour of a flood barrier across the River Wyre at Fleetwood as the best and most cost effective means of providing flood protection to both sides of the River Wyre as well as a means of preventing upstream tidal locks. What is your view on whether the Flood Risk Assessment should include an assessment on such a scheme?

The prospect of inundation and concomitant loss of land and businesses on the sides of the River Wyre as contemplated by the Assessment is of great concern.

All methods of combating and avoiding such inundation and loss warrants the deepest possible consideration and an investigation into all possible means of prevention or mitigation.

We welcome your earliest response and information requested.

Yours faithfully,



Andrew Eastham (LLB Hons)
(For and with the authority of FREE)