

From: Edward Greenwood [REDACTED]

Sent: 07 October 2019 11:41

To: A585 Windy Harbour to Skippool <A585WindyHarbourtoSkippool@planninginspectorate.gov.uk>

Subject: A585 Windy Harbour to Skippool Improvement Scheme

Your reference TR010035

Our reference (as an Interested Party) 20021754

Dear Mr Wiltshire

We refer to your emails regarding the dwarf wall at Skippool. Local opinion is that it will not serve a useful purpose now or in a hundred years time.

It is not clear how it will prevent flood water taking its normal path across Thornton Lodge car park and onto Skippool Road. If the tide is increased by a tidal surge it could be high enough to flood Skippool Junction.

We have made several attempts to establish the predicted height used in the Flood Risk Assessment on (FRA) during a 1 in 200 year storm on the River Wyre but these details cannot be disclosed by Highways England. However, an analysis of storm surge data indicates that this year the tide height could be 7m AOD which would flood Skippool Junction and its surrounding houses.

It is remarkable that the formula used in the FRA to calculate flood depth at Skippool after a 100 years of rising sea levels produces a tide height similar to the level that can occur today whilst the same tides will inundate large areas of Thornton, Cleveleys and Fleetwood.

For some years I have been concerned about the sea defences along our coast. I discussed this again with Wyre Council on 28 August 2019 who were not aware of the Arcadis FRA which predicted that large parts of Wyre Borough would be flooded. Since then I understand Wyre Council have applied for funding to improve the new sea defences at Cleveleys.

Clearly there is a duty of care to prevent loss of life due to flooding. At Skippool this risk exists now and in 50 years it could be an annual event. Building an expensive road appears to be irresponsible when there will be an ever increasing risk of it flooding.

Turning to Highways England's 7.32 Responses to our Deadline 7 Representations published on 3 October 2019; there has not been sufficient time to consider them all in detail. We will be holding a meeting this week to discuss this Response but in the meantime I have attached an analysis of one of our submissions which together with the above is our Deadline 9 Representation.

Yours sincerely

Edward Greenwood

Submission to the Planning Inspectorate 7 October 2019

A585 Windy Harbour to Skippool Improvement Scheme

EXECUTIVE SUMMARY

All the Wards in Fleetwood are deprived areas in need of regeneration

Flood risks

Fleetwood's beaches were being washed away due to an experiment in not maintaining the breakwaters. This led to increased river silting and eventually contributed to Stena Line closing the Irish Ferry service. Having questioned this policy for many years without success our MP was able to influence opinions at Wyre and the breakwaters were rebuilt. Only recently has Wyre Council appreciated the key part breakwaters play in retaining beach material and based on this I understand their consultants have researched altering these structures to strengthen the sea defences.

Halcrow were consultants for Wyre Flood and Coastal Strategy Plan in which retreat rather than improving Fleetwood's sea defences was planned. The A585 Flood Risk Assessment (FRA) by the Environment Agency takes the same view of Thornton Cleveleys and Fleetwood. It argues that large areas of these towns will be inundated because it will be too costly to prevent flooding as sea levels rise. But when the assets at risk are taken into account improving the sea defences is a viable option.

The FRA states that in 100 years tide heights will increase by 1.25m and the road at Skippool will flood to a depth of 100mm. This level of flooding will occur during Mean High Water–Springs (4.4m AOD) and protection against Higher Astronomical Tides (5.3 to 5.9m AOD) would be achieved by building a dwarf wall above Horsebridge Dyke. These estimations are misleading because they exclude tidal surges.

The National Oceanographic Centre Model shows that there can be 2.5m tidal surges in the Irish Sea

During a 1 in 200 year storm, a tidal surge of over 2m can take place during a 5m AOD Spring Tide. Allowing what is now considered to be the minimum sea level rise of 1.25m, flood water on the road at Skippool would be 8.25m AOD. The water on the road at Skippool would not be 100mm deep, but almost 2 metres.

It has been estimated that sea levels could rise by over 0.5m in fifty years. There are now over thirty 5m AOD tides each year and when one occurs during a 1.0m tidal surge the dwarf wall will be overtopped. Storm surges can last for days and when they occur during a series of high tides the only road from the M55 will be flooded for several days at Windy Harbour and Skippool.

Tidal surges on the east side of the Irish Sea are not as predictable as those in the North Sea. During the 11 November 1977 floods the heights of the tidal surges varied by almost a metre in this part of the Irish Sea and at Liverpool the tidal surge was not high enough to cause flooding. The flood warning for the Fylde coast only came 2 hours before high. It is unlikely that forecasting will improve the predictability by the period needed to organise an evacuation.

Therefore organising an effective evacuation over a wide area at such short notice will not be a practical method of saving lives.

The only viable option is to arrange that the sea defences are adequate to prevent flooding as they do in Holland. In the long term this is cheaper and more effective than having large teams of people on standby for fifty years or more waiting for a storm.

A flood barrier at Fleetwood will prevent the bypass and vast areas along the river from flooding and without it lives will be lost. With this in place much needed reliable green energy can be generated cheaper than gas or nuclear.

Road Improvements from Skippool to Fleetwood

In 2008 the Fleetwood and Thornton Area Action Plan was announced with the intention to improve the A585. This was to be achieved by making minor modifications to junctions on the A585 from Windy Harbour to Fleetwood. After spending several million pounds on the 2009 Sustainable Transport Strategy Plan devised by Wyre Council, Halcrow, the Highways Agency and approved by the Planning Inspectorate; the increased vehicle movements predicted did not materialise but congestion increased.

In early 2015 George Osbourne MP announced the Government's intention to improve the A585 by 2020. I gave copies of my suggestions for reducing gridlock to our MP Eric Ollerenshaw. The hope was that he would again be able to influence opinions and improve the A585 to Fleetwood.

In 2015 Kat Smith became our MP and Eric Ollerenshaw was not able to continue his work to improve the Town.

Although Councillors warned me that Highways England does not support or acknowledge any suggestions, when the bypass was given financial backing I did my utmost to ensure the £150m budget would benefit residents along the coast.

Regrettably unlike the 2009 Scheme, the remit was only aimed at eliminating the gridlock at Little Singleton. To achieve this Option 1 is a high speed bypass on 30 acres of agricultural land which passes through a beauty spot destroying its tranquillity and causing many unwelcome environmental changes.

Option G is less environmentally damaging and mostly on existing roads. Slower moving vehicles on this shorter route would produce less CO₂, noise, pollution and traffic congestion. The concept was rejected by Highways England primarily because the comparative journey times were allegedly longer. This is set out on Page 102 of Highways Englands Stage 2 – Scheme Assessment Report where conclusions are questionable, **Refer to REP4 – 025 in HE response to REP5 – 023. FREE 025.4.** Option G journey times will not be significantly greater than Option 1 and any time saved will be lost with the increased congestion.

For the most part the existing roads at each end of the bypass are single carriageways that inhibit traffic flow. Amounderness Way is a narrow single carriageway feeding traffic to Skippool junction through a circus of 44 traffic lights that will create greater stop/start for vehicles entering the bypass 24/7. An analysis based on recordings of vehicle movements at existing junctions shows that less than 40 vehicles out of the 150 in the queue on Amounderness Way will enter the bypass after allowances for additional lanes. Vehicles making a "U" turn at Skippool Bridge to the filling Station will cause greater delays than they do at present on Mains Lane. Time will tell but I doubt that like the 2009 transport Strategy Plan, the bypass scheme will not come up to expectations.

With regard to the cases for crossroads and traffic islands it seems the Jury is still out. I suspect as has been found at motorway junction traffic islands with automatically controlled traffic lights they will also work better 24/7 in many other locations if speed cameras are installed.

There are four reasons why the scheme should not go ahead in its present form. (1) Severe flooding will become a major risk in a few decades. (2) Little Singleton bypass is not the best option. (3) Traffic light controlled crossroads inhibit traffic flow 24/7. (4) The aims of the Fylde Coast Highways and Transport Masterplan is aimed at boosting the economy and reducing gridlock; the bypass will have the opposite effect for Fleetwood.

Finding ways to prevent global warming, flooding and generating large amounts of green energy are the most important issues we face and the River Wyre can make a positive contribution to all these goals.

Unless the River Wyre is controlled these benefits will not be achieved and the bypass will fail.

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 13 – REP1- 004 Page 23

Highways England response RR – 010.1 to 010.10

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. Responses to Highways England in blue type

HE. Highways England reference documents in brown type

HE DL 8 Response to DL 7

FREE Response to DL 8

FREE. 010.1 The object of the proposed bypass road from Windy Harbour to Skippool is to eliminate traffic congestion at Little Singleton junction and reduce the number of vehicles using Mains Lane.

HE. 010.1 The objectives of the scheme are not only “to eliminate traffic congestion at Little Singleton junction and reduce the number of vehicles using Mains Lane” but also to provide the following as outlined in Chapter 2 of the Environmental Statement (document reference TR010035/APP/6.2)

- Reduce severance and improve access across the A585 between Little Singleton and Skippool Junctions
- Improve connectivity and community cohesion
- Making the A585 route safer by reducing conflicts between users
- Improve journey time reliability by reducing congestion • Deliver capacity enhancements to the SRN whilst supporting the use of sustainable modes
- Support employment and residential/commercial development and growth opportunities
- Support the removal of obstacles to economic growth potential in both Wyre and Fylde
- Reduce/minimise the impact on the wider environment particularly for air quality and noise
- Complement and realise the full benefits of other Operations Directorate schemes in the region.

FREE. 010.1 The objectives set out in Chapter 2 are intended to apply to the whole area covered by the Fylde Coast Highways and Transport Masterplan. (FCH&TM). But this will not apply to residents living north of Skippool and for this reason the Scheme does not meet the criteria of the Masterplan. It will not remove obstacles to economic growth potential in Fleetwood.

HE. REP7 039.1. 010.1 The Fylde Coast Highways and Transport Masterplan is a document produced and adopted by Lancashire County Council. The A585 Windy Harbour to Skippool Improvement Scheme is listed within it, following ongoing liaison between the Applicant and Lancashire County Council. As previously mentioned to Mr Greenwood and Fleetwood Renewable Energy Enterprise, Highways England’s role is to support

economic growth through the provision of the Strategic Road Network, the responsibility of the local road network lies with Lancashire County Council.

FREE. REP7 039.1 010.1 The 2009 A585 Improvement Scheme that was to be monitored by Lancashire County Council did not achieve expectations and the proposed Bypass will not benefit Fleetwood.

FREE 010.2 Over 50 percent of the population of Wyre Council reside along the coast and they will be adversely affected by the new road because the **Project Remit** turns a blind eye to traffic conditions beyond Skippool.

HE. 10.2 As defined in Highways England's RIS1 Delivery Plan, the Scheme requirements were to assess the A585 from Windy Harbour Junction to Skippool Junction to address the congestion and safety concerns at the junctions along this stretch. It is acknowledged that although altering the scheme extent would change the Scheme's Economic Assessment result, the Scheme proposed will still generate economic, operational and environmental benefits without any extension to the M55 or towards Fleetwood as presented in Planning Statement and National Policy Accordance, Section 2.9 (document reference TR010035/APP/7.1). In addition, the Highways England Operations Directorate is conducting investigatory studies for the A585/B5269 (Thistleton/Mile Road) and the M55 Junction 3 along Fleetwood Road that are separate from the A585 Windy Harbour to Skippool Improvement Scheme. A sensitivity test was undertaken by the Applicant that considered the impact of other Operations Directorate schemes on the A585 Windy Harbour to Skippool Improvement Scheme which showed that when including the capacity improvement upgrades of adjacent potential Operations Directorate schemes along the A585 route it remained economically worthwhile (based on an assessment of Transport User Benefits only) to proceed with the A585 Windy Harbour to Skippool Improvement Scheme. The impact of the Scheme on traffic distribution across the highway network has been assessed and can be found in Appendices F and H of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12)

FREE, 10.2 In 2007 Wyre Council were of the opinion that road access to Fleetwood was inadequate and it is an indisputable fact that the subsequent Fleetwood Thornton Area Action Plan Transport Strategy failed to improve the A585.

It was suggested that the Area Action Plan should consider a greater area of Fleetwood but this was defeated by Wyre, The Planning Inspectorate and Highways Agency.

Wyre Council's sea defence policy since before 2004 has been to retreat on the north coast at Fleetwood. The A585 Flood Risk Assessment (FRA) has a similar view and predicts that it is unaffordable to prevent Thornton, Cleveleys and Fleetwood being inundated in the foreseeable future. This is a misjudgment because the cost of improved sea defence compared with the value of assets at risk is insignificant. **Refer to REP3 FREE 063.5**

With suitable sea defences in place the appraisal based Section 2.9 of the Planning Statement and Appendices F and H of the Combined Modelling Report should be reviewed. There is an argument that there is an economic case for improving the A585 towards Fleetwood.

HE. REP7 039.2 010.2 The Fleetwood Thornton Area Action Plan was developed by Wyre Council and adopted in 2009, this plan has now been superseded by the Wyre Local Plan adopted in February 2019 which assisted with the traffic forecasting process and forms the basis of the uncertainty log as described in 3.3.27 to 3.3.32 in the Transport Assessment (document reference TR010035/APP/7.4). There have been numerous liaisons between the Applicant and Wyre Council and as a result Wyre Council are in agreement

with the Scheme as outlined in the Statement of Common Ground with Wyre Borough Council (document reference TR010035/APP/8.4).

FREE. REP7 039.2 010.2 The Fleetwood Thornton Area Action Plan developed by Wyre Council included an A585 improvement scheme that was approved by the Planning Inspectorate and was to be monitored by Lancashire County Council. Some work was undertaken in accordance with the Scheme but it did not improve access to Fleetwood.

If the intention was to rectify these long standing defects the present remit should have included improvements beyond Norcross when the present A585 scheme was being considered in 2015. Any contribution by the Wyre Local Plan will be too little too late unless the Scheme is significantly amended.

FREE. 010.3 The effect of the bypass will be to move the long delays at Little Singleton to Skippool.

HE. 10.3 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) Appendix F and H.

FREE 10.3 Appendices F and H do not prove that congestion will not be moved to Skippool.

HE. REP7 039.3 010.3a Appendix H of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) states the following in section 4.4.8; “The queue length results show that the queues on the A585 Mains Lane slightly exceed the maximum expected free flow queue length, by approximately 1 PCU in the AM peak, and approximately 2 PCUs in the PM peak. The distance to the next junction (Skippool Bridge) is far enough that there is minimal risk of these queues causing blocking back to the junction. The PM peak maximum modelled queue length on A585 Amounderness Way exceeds the maximum expected by approximately 2.5 PCUs. Similarly, there is a minimal risk of this causing blocking back across any upstream junctions”.

FREE.REP7 039.3 010.3a TR010035/APP/7.12 Section 4.4.5 indicates that congestion at Skippool can be greater than shown in Figure 4.4 with an estimated increase in traffic flow from an improved Norcross Junction. This does not take account of traffic delays at Skippool set out below

The current 60 second of Mains Lane traffic flow is followed by a 30 second stop period at Shard Road Tee Junction. At peak periods the cumulative effect of this stoppage creates a slow moving queue extending back to Norcross from where journey times to Shard Road frequently take 10 minutes.

Skippool Junction joins 4 roads and if controlled with traffic lights there will be 4 or 5 more movement sequences than at the present Mains lane/Shard Road Junction. If each additional sequence at Skippool takes an average of 15 seconds there will only be 50 seconds for traffic movement from Amounderness Way to the bypass out of the proposed 125 second cycle period. This window for this traffic movement will be further reduced when bypass traffic is stopped for cars from Shard Road and east bound vehicles accessing Skippool Filling Station. This will result in increased congestion on Amounderness Way beyond Norcross Junction. For pedestrians and cyclists who need to cross 3 or 4 roads it will be time consuming unless the crossings are manually controlled. This will add further delays to Amounderness Way traffic and increase congestion in both directions.

HE. . REP7 039.3 010.3b Operational modelling of the existing Skippool roundabout as part of the Applicant's Option Selection found that the junction would experience severe congestion and delays (queues of 90+ vehicles) in the design year as a result of predicted background traffic growth, with queues extending back towards the Norcross junction.

FREE. 010.3b Although Skippool roundabout was modified twice before it emerged in its present form it was not big enough to cope with demand. A larger more efficient design controlled with traffic lights at peak periods would result in improved vehicle flow 24/7 and prevent queues extending back to Norcross.

HE. REP7 039.3 010.3c Similarly, long delays and queues (70+ vehicles) predicted at the existing Little Singleton junction without an intervention.

FREE. 010.3c Refer to 010.3a

HE. REP7 039.3 010.3d One effect of the bypass is to relieve congestion in the Little Singleton area. The proposed signalised junction at Skippool also accommodates the predicted uplift in traffic as a result of background traffic growth, as well as the additional traffic attracted to the scheme as a result of the additional network capacity. Delays around Skippool are significantly reduced as a result of the proposed Scheme compared to the equivalent without Scheme scenario in the design year.

FREE. 010.3d Refer to 010.3a

HE. REP7 039.3 010.3e Queue lengths and delays at the Little Singleton junction without the Scheme in place, are significantly in excess of queues and delays at the upgraded Skippool junction with the Scheme in place. It is therefore considered that the Scheme does not move congestion from Little Singleton to Skippool.

FREE. 010.3e The distance between Windy Harbour to Little Singleton is 0.3 km shorter than that between Norcross and Skippool Junctions. Congestion backing up from Skippool along Amounderness Way will increase whilst the queue from Windy Harbour to Little Singleton will not occur. Therefore the effect of the Scheme is to move congestion from Little Singleton to Skippool.

FREE. 10.4 The proposed changes to Norcross junction could contribute to reducing delays at Skippool but the redesign is not included in the Development Consent Order Application. Without such details it is not possible to take a realistic view of the bypass.

HE. 10.4 The Norcross junction improvements will be completed in advance of the Scheme and confirmed that the Norcross scheme is predicted to deliver journey time benefits and reduce queuing which will provide capacity growth in the future, when completed, both schemes would complement one another.

FREE 10.4 When the Norcross and Skippool Junction modifications are completed the traffic tailback from Skippool will continue to cause delays.

HE. REP7 039.4 010.4 As previously conveyed to Mr Greenwood, the perceived delays along Amounderness Way are due to a lack of capacity at Skippool junction and Norcross junction which causes the issues. Therefore, the modifications to Skippool Junction as part of the Scheme and the proposed

modifications at Norcross junction as part of Highways England Asset Renewal Programme, will alleviate congestion along this section of highway. The modifications of both junctions have been modelled and be found to complement one another in relieving congestion. Also refer to drawings HE548643-ARC-GEN-SZ_ZZ_000-DR-D-4046 and HE548643-ARC- GEN-SZ_ZZ_000-DR-D-4047 in Appendix A of Responses to the ExA's Further Written Questions (document reference TR010035/APP/7.22), which outline the proposed Highways England improvements alongside the Scheme.

FREE. REP7 039.4 010.4 Refer to 010.3a, 010.3b and 010.3e

FREE 10.5 Poor access to Fleetwood has contributed to all the Town's Wards becoming deprived areas. As a consequence Highways England took the view that because the area was in decline improving access to Fleetwood was not a priority.

HE. 10.5 The Applicant does not agree with this statement. The role of Highways England is to support economic growth through the provision of the Strategic Road Network.

FREE. 10.5 This comment was made by a Highways England official during one of the consultations and is consistent with lack of attention to regenerate the Town. Can it be that like Fairbourne plans have been drawn up beyond allowing the sea defences to retreat as set out in the March 2004 Strategy Plan? Highways England was involved in the preparation of Fleetwood and Thornton Area Action Plan and congestion problems continue. Refer to FREE 10.2 above

HE. REP7 039.5 010.5 Refer to response to REP7-039.2 above.

FREE. REP7 039.5 010.5 Refer to **FREE. REP7 039.2 010.2**

FREE. 10.6 Cardiff like Fleetwood had been in decline for decades when the Council took steps to de-designate their environmentally protected bay so the Town could regenerate. There were serious concerns about taking this action but the environmental changes proved to be negligible. The 2003 British Trust for Ornithology report shows that controlling tidal flow in the Bay has brought about minor changes for wild life with some winners and losers. However, overall the changes have not been significant but for both residents and visitors the transformation of the Bay has brought about outstanding improvements.

HE. 10.6 The Applicant's focus is on improving transport to support the Local Authorities proposals; ultimately any proposals to regenerate the area would be led by the local planning authorities.

FREE. 10.6 In preparing remits for the bypass and the AAP; regeneration of the Town has not been given the attention it warrants by the Local Planning Authorities and does not meet the aims of the FCT&TM.

HE. REP7 039.6 Refer to response to REP7-039.2

FREE. REP7 039.6 Refer to **FREE. REP7 039.2 010.2**

FREE. 10.7 Wyre Council's 2007 Fleetwood Masterplan aimed at reversing the Town's decline was considered by one of the Country's leading town planners as an ineffective document to bring about the Town's regeneration.

This scheme was followed by the 2009 Fleetwood Seafront Masterplan based on the 2007 Fleetwood Masterplan. The goal was to boost the Town's economy by attracting more people to look at the Lake District hills from Fleetwood. The consultant's Plan was for minor attractions to be built in various Zones along the Seafront.

In this way Fleetwood's cultural heritage and unique environment was to be protected and enhanced whilst the Council, statutory bodies, businesses residents and other stakeholders were to support this vision.

HE. 10.7 Refer to response RR-10 (10.6)

FREE 10.7 Refer to Response RR – 10.6

HE. . REP7 039.7 010.7 Refer to response to REP7-039.2 above

FREE. . REP7 039.7 010.7 Refer to **FREE. REP7 039.2 010.2**

FREE. 10.8 The Masterplans are available on the internet but neither has worked. Fleetwood's decline continues as predicted in 2007 with businesses and visitor attractions continuing to close or go into administration.

HE. RR 10.8 Refer to response RR-10 (10.6)

FREE. 10.8 Refer to Response – 10.6

HE. REP7 039.3 010.8 Refer to responses to REP7-039.1 and REP7-039.2 above

FREE. . REP7 039.8 010.8 Refer to **FREE. REP7 039.1 010.1** and **FREE. REP7 039.2 010.2**

FREE. 10.9 The Plan to turn the Town's industrial housing estates has increased commuters on the A585. If Wyre Council's advisers had had the vision of those at Cardiff, a road network would have inevitably been put in place to support the changes and regeneration.

HE 10.9 Noted – no response required.

FREE Refer to Response RR – 10.6

HE. REP7 039.9 010.9 Refer to response to REP7-039.2 above

FREE. . REP7 039.9 010.9 Refer to **FREE. REP7 039.2 010.2**

FREE. 10.10 Clearly a holistic view has to be taken and modifying the A585 Remit to include the wider area is vital if the best use is to be made of human and financial resource.

HE 10.9 Noted – no response required.

FREE See Response RR – 10.6

HE. REP7 039.10 010.10 Refer to responses to REP7-039.1, REP7-039.2 and REP7-39.4 above

FREE. . REP7 039.10 010.10 Refer to FREE.REP7 039.3 010.1 and 010.3