

**Application by Highways England for a Development Consent Order in relation to the A585 Windy Harbour to Skippool Improvement Scheme (TR010035)**

Fylde Borough Council (our reference: 20021788)

17 May 2019

**Deadline 2: Written Representation (FBC document reference 2.1)**

Fylde Borough Council (FBC) submitted a Relevant Representation (RR) to the Planning Inspectorate on 24 January 2019 setting out its views on the application under seven topic headings. A copy of that RR is attached at Appendix 1 below.

FBC has provided a detailed commentary on the development's positive, neutral and negative effects in its Local Impact Report (LIR) – FBC document reference 2.2. The LIR also makes observations concerning the adequacy of the draft Development Consent Order (dDCO), including the Council's views on the need for amendments and additions to it.

Matters of agreement and disagreement between the Applicant and FBC are highlighted in the Statement of Common Ground (SoCG) – FBC document reference 2.3. Where FBC considers that amendments are needed to the Articles and Requirements in the dDCO, these are clearly identified in the SoCG.

FBC has given detailed responses to the Examining Authority's (ExA) first written questions (ExQ1) – FBC document reference 2.4, where it expands upon and provides evidence in relation to its observations concerning several of the Principal Issues identified in the ExA's Rule 6 letter (as cross referenced in the LIR).

FBC has, where necessary, provided its latest responses to the Applicant's comments on the Council's RR in a separate document – FBC document reference 2.5. FBC would ask that those responses are read alongside its RR at Appendix 1.

When read in conjunction with the detailed submissions mentioned above, FBC considers that the representations in Appendix 1 continue to provide an accurate summary of its position on the Application. Accordingly, the Council does not wish to make any additional written representations beyond those already set out in its RR (as amended and/or supplemented by document reference 2.5).

## **APPENDIX 1 – FBC Relevant Representation 24 January 2019**

The Local Planning Authority (LPA) provided comments to Highways England on the pre-application Windy Harbour to Skippool Improvement Scheme by letter dated 3<sup>rd</sup> May 2018 (LPA reference MDE/ENQ/18/0091). The proposal set out in the application for examination is, aside from the replacement of roundabouts at the Poulton and Singleton junctions with signalised junctions and alterations to the landscaping strategy, substantially the same as the pre-application scheme. In summary, the LPA considers the main issues which fall within its remit to comment on to relate to the following topics:

### ***Principle of development:***

- Policy T1 and paragraphs 11.35-11.37 of the Fylde Local Plan to 2032 state that the delivery of strategic highway improvements within the borough, including the “A585 Skippool – Windy Harbour Improvements”, will be supported. The LPA recognises the scheme’s benefits in terms of its potential to alleviate traffic congestion and improve air quality along this corridor of the A585 (Garstang New Road and Mains Lane). Accordingly the LPA is supportive of the principle of development, subject to site-specific considerations relating to the scheme’s detailed design.

### ***Visual/landscape issues:***

- Subject to the submission of a detailed soft landscaping scheme to identify the precise size, type, species, siting, planting distances and programme of planting of trees, hedges and shrubs (including provisions for a 10 year replacement period and ongoing maintenance), the LPA agrees that the indicative landscaping scheme set out in document 6.19 of the Environmental Statement (ES) will provide appropriate compensation for trees and hedgerows to be removed in connection with the development, and suitable screening of the bypass.
- The LPA is concerned that the present design of the “Grange Footbridge” (images of which are shown in viewpoint 9 of document 6.9 to the ES) would result in an overtly utilitarian and inherently urban appearance to the structure and would suggest that opportunities be explored to provide a design solution that is more sympathetic to this rural setting. For example, by introducing a mounded embankment to conceal the return of the long ramped accesses.
- Viewpoint 10 of document 6.9 to the ES illustrates views across the Lodge Lane bridge from the south. However, the LPA considers that the most important views of this feature (i.e. those to show the visual impact of the cutting, retaining wall and acoustic fence) will be from the north side of the bridge. Accordingly, the LPA considers that an additional viewpoint and photomontage is required from the northern end of the Lodge Lane bridge looking south back towards the cutting.

### ***Noise:***

- The close proximity of the bypass to neighbouring dwellings – particularly those surrounding the Lodge Lane bridge – would give rise to a significant increase in noise disturbance to properties at North Lodge, The Manor, Barnfield Manor and Singleton Hall which would diminish living conditions for the occupiers of those dwellings. The main concern is that the dwellings affected by an increase in noise level from road traffic have, historically, benefited from a low background sound level due to their rural location. Therefore, while the actual predicted noise level may not be defined as being detrimental to health, the difference between current and predicted level is significant.
- Document 6.11 of the ES indicates that the dwelling at North Lodge qualifies for sound insulation under the Noise Insulation Regulations scheme. However, clarification is required as to why this is the only property within the group which qualifies given the bypass’ close proximity to other dwellings in the same area.
- The harmful effects identified above must, however, be weighed against: (i) the wider benefits of the scheme; (ii) the benefits arising from noise to other dwellings on Mains Lane which would occur from the reassignment of traffic away from the A585; and (iii) the effectiveness of the attenuation measures proposed in order to avoid increased noise reaching levels that are detrimental to health.

***Air quality:***

- The Council has undertaken air quality monitoring at the Singleton Crossroads (also known as “Five Lane Ends”) since January 2017. This monitoring indicates that current, mean NO<sub>x</sub> levels in this location are very close to the EU maximum of 40 mg/m<sup>3</sup>. The proposed bypass has the potential to reduce this figure by lessening the amount of standing traffic and, ultimately, preventing the designation of an Air Quality Management Area.

***Heritage:***

- The cluster of buildings at Singleton Hall (including the grade II listed ice house), North Lodge, The Manor and Barnfield Manor have significance as heritage assets (both designated and non-designated). The close proximity of the bypass to this group of buildings would have an adverse impact on the setting of these heritage assets by urbanising their rural setting within open fields and separating North Lodge from the rest of the cluster by severing the original driveway link to Singleton Hall. These effects could, to some extent, be mitigated by the applicant making a financial contribution to the Richard Dumbreck Trust for a “Heritage Improvement Scheme” involving the provision of pathways through the Singleton Park area to allow enhanced public views of the building cluster.
- A 2m high noise barrier is proposed to the east of the Lodge Lane bridge, along the southern edge of the bypass where it flanks Barnfield Manor and The Manor. This noise barrier is shown as an acoustic fence backed by low-level planting on viewpoint 10 of document 6.9 to the ES. The LPA considers that it would be preferable for this fence to be replaced with an alternative boundary treatment (e.g. a red brick wall) in order to afford a more sympathetic relationship with the vernacular of neighbouring buildings.

***Land bridge:***

- The LPA is disappointed that the pre-application option of introducing a “land bridge” over the Lodge Lane crossing has not been brought forward in the application as this would have delivered multiple benefits including: (i) a more extensive and sympathetic means of screening the cutting; (ii) allowing the retention of the original access drive to Singleton Hall adjacent to North Lodge and reducing effects on the setting of heritage assets; and (iii) a more effective and aesthetically pleasing means of noise attenuation.

***Highways:***

- The LPA is concerned that the absence of any simultaneous improvements to the Fleetwood Road stretch of the A585 (running southbound between the Windy Harbour junction and junction 3 of the M55) in conjunction with the bypass would restrict the scheme’s benefits in alleviating traffic congestion only to the stretch applied for and could act to move existing congestion onto other parts of the A585 which have less capacity to accommodate flows emerging from the bypass.
- In particular, there have been a number of serious accidents at the A585/B5269 (Thistleton/Mile Road) junction, but the scheme does not propose any improvements to this junction or the wider Fleetwood Road section of the A585. Accordingly, the LPA is concerned that the scheme does not appear to deliver a holistic approach to improving the safety and capacity of the wider highway network, especially those parts with less capacity that would be linked directly with the bypass.