From: [redacted]
To: A585 Windy Harbour to Skippool
Subject: A585 Windy Harbour to Skippool Improvement Scheme
Date: 20 September 2019 23:08:52
Attachments: Deadline 7 Representation.pdf

Your reference TR010035

Our reference (as an Interested Party) 20021754

Dear Mr Wiltshire
With regard to our previous Representations we were not aware until a few week ago that we would find responses from Highways England amongst the thousands of documents they submitted. As a result of the apparent silence we took legal advice in an attempt to get a response. Regrettably critical queries remain unanswered.
Other Interested Parties we have spoken to were similarly unaware of the procedure for responding to Representations. Had we been aware of this earlier we would have questioned Highways England's interpretations sooner.
Clearly neither the 2009 Strategy or the bypass in its present form will reverse the decline of our Town.
The attached Representation sets out our understanding of the issues and we hope this will lead to a clarification and an improvement to the scheme.
Yours sincerely

Edward Greenwood

FREE 2007

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 were 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.

FREE 2007

Submission to the Planning Inspectorate 23 January 2019

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 12/22 – REP1- 004

Highways England response RR - 010

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. **Responses to Highways England 31 May 2019 in blue type**

HE. Highways England reference documents in brown type

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

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.

FREE. 10.3 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.

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.

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

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.

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

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

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

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

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Submission to the Planning Inspectorate 17 May 2019

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 18/24 – REP3- 011 Highways England response to REP2 – 063.1 to 063.5

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. Responses to Highways England 31 May 2019 in blue type

HE. Highways England reference documents in brown type

FREE. 063.1 We are concerned that the above Scheme will not improve communication to Fleetwood which have become progressively worse following the Fleetwood and Thornton Area Action Plan. It seems to us that greater use can be made of the River Wyre which is an asset of huge benefit for the area and the reason for the Town being built. It could now be used to reduce traffic congestion over a wide area and managed to prevent flooding whilst producing renewable energy. We trust that in preparing your report for road improvements you will take all these benefits into consideration.

HE. 063.1 The Applicant notes and has had regard to the comments made.

FREE 063.2 Introduction The Borough of Fleetwood was a town of high employment when it was amalgamated with a number of nearby Urban District Councils to form Wyre Borough. The Town had been an area of high employment until the collapse of the UK fishing industry and the closure of the ICI chemical plants. The loss of employment in the Town resulted in an increase in commuters.

Originally the Town had been well planned with residential and industrial areas and the Local Authority sought to reverse the decline with a series of Master and Action Plans starting in 2007. These schemes concentrated on building large scale housing developments on brownfield sites including one on reclaimed industrial land between the River Wyre and the Dock.
Congestion on the A585 was already a concern and additional residents would create more commuters.
The attached letter from Wyre Planning Services refers to the Fleetwood and Thornton Area Action Plan acknowledging the limited road capacity for vehicles from 1300 additional homes and the potential flood risk issues.

HE. 063.2 The Applicant notes and has had regard to the comments made.

FREE. 063.2 The issues raised relate to congestion acknowledged by Wyre Council in 2007 and the subsequent 2009 Fleetwood Thornton Area Action Plan Transport Strategy Plan designed by the Highways Agency.

The implication of HE's response acknowledges that the 2009 Transport Strategy failed to address the problem. Refer to FREE. RR-010.2

FREE 063.3 Limited Road capacity Congestion on the A585's narrow two lane roads to Fleetwood made potential employers wary of expanding in Fleetwood and poor road access later contributed to the closure of the Ferry Service to Ireland.

To deal with additional traffic from the proposed housing developments individual junctions were assessed for improvements on the A585 and the cost was to be apportioned to proposed housing developments. Drawings were prepared for improving 12 junctions but only 3 of the junctions were significantly modified. The junctions that were modified were not those that created the greatest congestion. The modification to the Windy Harbour Junction has not significantly improved traffic flow. Reducing two lanes to one over a short distance on Fleetwood Road tends to create conflict and is a hazard for drivers.
The Planning Inspector was perceptive in questioning the soundness of the Area Action Plan with regard to traffic implications. In the event the proposed improvements, albeit of questionable value, were not undertaken and congestion has increased.

HE. 063.3 One of the objectives of the Scheme is to realise the benefits of the Windy Harbour junction improvements.

As defined in Highways England's RIS 1 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 the Planning Statement and National Policy Accordance (Document reference TR010035/APP/7.1) Section 2.9. In addition, the Highways England Asset Renewal Programme is conducting investigatory studies for possible junction improvements at Norcross, 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. 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).

HE. 2.9 Economic Case

2.9.1 A business case for the Scheme has been produced by the Applicant in accordance with The Department for Transport (DfT) Transport Analysis Guidance (TAG) which recommends that options should be appraised using cost-benefit analysis in accordance with the Green Book (HMT, 2003). This is achieved through, wherever feasible, attributing monetary values to the impacts of the proposal. Cost-benefit analysis quantifies in monetary terms as many of the costs and benefits of a proposal as feasible, including items for which the market does not provide a satisfactory measure of economic value.

FREE. 2.9 .1. This excludes any consideration of an economic contribution beyond Skippool.

2.9.2 The impacts of the Scheme are recorded in the Appraisal Summary Table (AST) contained within the Stage 3 Economic Appraisal, which Highways England has prepared. The AST provides a summary of the economic, environmental, social and public accounts costs and benefits. Estimates of costs and benefits to transport users and providers from the Analysis of Monetised Costs and Benefits Table have been included

in the AST which therefore includes costs and benefits for which the evidence on monetary values is considered most robust.

FREE. 2.9.2. Refer to 2.9.1

2.9.3 The Economic Appraisal was undertaken to facilitate the quantification and monetisation of the Scheme costs and benefits in accordance with DfT TAG Units A1, A2, A3 and A4. The assessment encompasses the economic impact on transport users over a 60-year period.

FREE. 2.93. Refer to 2.9.1

2.9.4 The preparation of Scheme costs has been carried out in accordance with the principles set out in TAG Unit A1.2 entitled 'Scheme Costs' under two broad headings – investment costs and maintenance costs. Investment costs are those that will be incurred in the preparation and construction of the scheme, including land acquisition costs. Maintenance costs are those that are required for the maintenance of the scheme.

FREE. 2.9.4. Refer to 2.91

2.9.5 The Scheme benefits broadly comprise the following:

- Road user benefits – savings in travel time and vehicle operating costs as a result of the Scheme

FREE. See REP 2 063.2 It is agreed that the 2009 Scheme failed and the proposed bypass has also not addressed congestion and economic development beyond Skippool.

- Safety benefits – due to changes in the number and/or severity of accidents as a result of the Scheme

FREE. An average reduction of half an accident and 2 casualties per year is insignificant with those that take place beyond Skippool

- Construction and maintenance (dis)benefits – due to changes in travel time and vehicle operating costs during the Scheme construction and maintenance

FREE. Delays and delay cost will be increased beyond Skippool.

- Environmental impacts – due to changes in greenhouse gas emissions, air quality and noise levels as a result of the Scheme

FREE. Standing traffic and greenhouse gas emissions will be reduced from Windy Harbour to beyond Norcross if Option G the shorter and slower route on exist roads are used

- Indirect tax revenue – due to changes in the amount of fuel purchased and the associated impact to revenue from fuel duty as a result of the Scheme

FREE. These costs will be higher with the bypass instead of altering the existing roads

- Journey time reliability impacts – due to changes in the journey time variability in the network as a result of the Scheme

FREE. Journey time from the coast will be increased with the bypass instead of altering the existing roads

- Distributional impacts as a result of the Scheme

FREE. Overall Negative Impact increased with the bypass instead of altering the existing roads

- Social impacts as a result of the Scheme

FREE. Overall Negative Impact with the bypass instead of altering the existing roads

- Wider Impacts as a result of the Scheme

FREE. Overall Negative Impact with the bypass instead of altering the existing roads

2.9.6 The Scheme costs are expressed as market prices, inflated to outturn costs using construction related inflation and rebased to 2010 calendar year profiles for economic calculations. An assessment of the maintenance costs of the Scheme has been prepared, applying TAG guidance. The change in indirect taxation revenues is related to changes in traffic levels and have been assessed as part of the process **FREE. FREE. 2.9.6 Does this imply that the £150m estimated cost is based on 2010 prices?**

2.9.7 The appraisal of transport user benefits and costs was conducted using the DfT's Transport User Benefit Appraisal (TUBA) software. TUBA was used to estimate the user and provider benefits in terms of travel time savings and vehicle operating cost savings using traffic forecasts output from the Scheme's transport model. TUBA works based on five standard definition time periods including weekday morning, inter-peak, evening and off-peak periods and the weekend period.

FREE. 2.9.7 In view of the recent Highways England's assessment of £300m wasted on traffic light controlled junctions the Planning Inspectorate should examine the results of the alleged dis-benefits for the proposed junctions.

2.9.8 An Analysis of Monetised Costs and Benefits (AMCB) for the Scheme was undertaken to summarise the monetised impacts of the Scheme. The AMCB brings the user benefits and scheme costs together with the accident and greenhouse gas impacts, where they can be quantified to generate the measures of economic worth, including the scheme's Initial Benefit-Cost Ratio (BCR). The BCR indicates how much benefit is obtained for each unit of cost, with a BCR greater than 1 indicating that the benefits outweigh the costs.

FREE 2.9.8 Refer to 2.9.7

2.9.9 As outlined in TAG Unit Section 3.4 the AMCB table includes costs and benefits for which the evidence on monetisation is considered most robust. There are other significant Scheme benefits, including Wider Impacts, Reliability and Weekend User Benefits where the evidence on monetisation is less well developed and therefore the analysis presented in the AMCB table does not provide a full measure of value for money and should not be used as the sole basis for decisions. Further analysis of monetised estimates of Reliability, Wider Impacts and weekend user benefits were appraised to allow the calculation of the Adjusted BCR to contribute to the Scheme evidence base.

FREE 2.9.9. The indications are that weekend assessments were not carried out. See 2.9.7 to verify

2.9.10 From the Stage 3 Economic Appraisal, the initial BCR of the Scheme is 1.26. Adding in weekend benefits, journey time reliability and wider impacts to provide an adjusted BCR increases the BCR to 2.02.
FREE 2.9.10 Refer to 2.9.8

2.9.11 The accident cost savings show that the Scheme provides better accident measures and is forecast to save around 30 accidents and 120 casualties over the 60-year appraisal period

FREE. 2.9.11 Are these estimates too small to quantify?

2.9.12 The scheme reduces severance for non-motorised users including walkers, cyclists and horse riders and improves access across the existing A585.

FREE. 2.9.12 Satisfactory occasional use could be achieved with manually controlled lights at junctions and make significant 24/7 savings for road users

2.9.13An appraisal of the economic impacts due to the Scheme that are additional to transport user benefits was undertaken which showed that the scheme supports economic growth in the area. Wider Impacts of the Scheme include Agglomeration Impacts, Output change in imperfectly competitive markets and Labour market impacts. In addition, the A585 mainline traffic flows is not forecast to reach capacity by the design year 2037 showing that the Scheme mainline has reserve capacity to support future development in the area.

FREE. 2.9.13 not true beyond Skippool

2.9.14 The Scheme improves journey time and reliability.

FREE 2.9.14 After spending £150m plus, gridlock between Windy Harbour and Little Singleton will be moved north and increased.

2.9.15 For the reasons above, the results of the A585 Windy Harbour to Skippool Improvement Scheme Economic Appraisal have shown that the overall objectives of the Scheme to improve safety along the route, reduce severance for non-motorised users, support economic growth and improve journey time reliability have been met and it is therefore worthwhile in economic terms to proceed with the Scheme.

FREE. 2.9.15 The Scheme does not meet the aims of the Fylde Coast Highways and Transport Masterplan for the whole area and it should be amended to meet the overall aims of the Masterplan

FREE. 063.4 The present gridlock from Skippool to Norcross is caused by the cumulative effect of stoppages at Shard Road. The resulting tailback is greater than that from Windy Harbour to Little Singleton which is the basis for spending £150 million pounds on the bypass.
Beyond Skippool the bypass will simply move traffic queues gathering from Shard Road to Skippool. Here the stoppage time will be greater and Skippool being 1000 metres nearer to Norcross, congestion will extend to at least Victoria Road.
On the basis of an analysis of traffic movements on the A585 there are no grounds to assume that traffic lights at Skippool and Norcross will reduce congestion. There are no details of the traffic light arrangement at the Skippool “U” turn which could cause considerable delays.
Queues from Victoria Road to Skippool Bridge will be double the length of those from Windy Harbour to Skippool. This will increase gridlock to and from the coast and inhibit economic grow

HE. 063.4 The Norcross junction improvements will be completed in advance of the Scheme. 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.
Details of the traffic light arrangements are presented on the General Arrangement Drawings (document reference TR010035/APP/2.5). The overall cycle time at the signals would vary depending on the traffic flows at different times of the day but have been tested with a limit of 135 seconds. Please also refer to AS-022.10 of the Comments on Relevant Representations (document reference TR010035/APP/7.9).
The impact of the Scheme on traffic flow and distribution is presented in the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12). At Skippool 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. Therefore, there is a minimal risk of this causing blocking back across any upstream junctions and causing increased delays. .

FREE. 063.4 The downside of the scheme has been underestimated. The statistical analysis in APP 7.12 does not take account of the changes that will take place if the bypass is built. Gridlock that regularly arises from Shard Road/Mains Lane junction traffic lights back to Norcross Junction will be of greater length when the bypass is built and start at the proposed Skippool Junction and extend back to Victoria Road. This traffic queue will be almost double the length of the present queue from Windy Harbour to Little Singleton.

FREE. 063.5 Flooding from the River Wyre In view of the flood risk there was an argument that this aspect of the Fleetwood and Thornton Area Action Plan should been reviewed. Wyre Council reported that flooding from the River Wyre relating to the Dock development was low risk in relation to a 1 in 200 year flood. The attached Sketch No FR 2100 based on expert opinion shows that this is not the case.

Before the housing development took place on the dock sand was pumped from the River Wyre to raise the ground. It was not raised sufficiently to prevent overtopping from a 1 in 200 years storm or one similar to the 1927 flood. Wyre Council were warned by a senior member of staff at the Environment Agency of this risk who also warned that the Agency would have no responsibility for any loss of land and property.

This risk could be eliminated with a flood barrier at the mouth of the river as they have at Ipswich to prevent similar flooding. It is not clear why such a scheme has been opposed for 12 years by Wyre Council.

The bypass will not meet the criteria of reducing grid-lock and increase economic growth which is the stated aim of the Fylde Coast Highways and Transport Masterplan.

With a flood barrier in place a road to the M6 across Pilling Sands could be built for a small fraction of the value of land and property at risk from flooding. This route would take pressure off the A585 and make Wyre Council into a more inclusive unit.

HE. 063.5 Please refer to the Flood Risk Assessment (document reference TR010035/APP/5.2 – rev 1) which has been agreed with the Environment Agency.

FREE. 063.5 TR010035/APP/5.2 is a 498 page document and the figures we found appear to be unrealistic for Skippool and inconsistent with the predictions for Thornton Cleveleys and Fleetwood. It was for this reason we sought clarification in the letters dated 27 June 2019, 12 July 2019 and 21 August 2019.

To confirm our understanding of the flood risks we have carried out survey along the river which we have summarized below:-

Flood Risk Assessments

The water level in the Irish Sea during November 1977 flood was recorded as 6.2 metres above Ordnance Datum (AOD). At Skippool the tidal surge was not as high and the water level rose to 6.0m AOD

Based on this and excluding rises in sea levels the Environment Agency estimated the tides could rise to 7.0m AOD during storms. Expert opinion varies on the extent sea levels rise over the next 100 years with estimates varying from less than a metre to 3 metres.

Experts at the recent Sea Change Conference at the Winter Gardens in Blackpool predicted that sea levels will rise by 2 metres and the consensus of opinion is that storms will become more frequent and powerful.

The Arcadis Flood Risk Assessment (FRA) indicates that by 2120 sea levels can rise by 1.253 metres. Adding this rise to the 1977 storm tide of 7.0m AOD will require sea defences being built to a minimum height of 8.25m AOD to prevent extensive flooding.

On Page 36 of the FRA the maximum tide height during a 1 in 200 year storm at Skippool is estimated to be 7.3m AOD including climate change. The proposed dwarf wall built to this level would not prevent Skippool being inundated when tides rise to 8.25m and flood the road to a depth of 1.8 metres.

The sea defences along the west coast except for those at Cleveleys and Rossall Promenade will cope with a 1 in 200 year storm and 0.8 rise in sea levels. Improving the sea defences at Cleveleys and Rossall Promenade would not be so costly and it would prevent Thornton, Cleveleys and Fleetwood from being flooded as the FRA predicts

In arriving at this conclusion in Item 9.1.8 on Page 47 of the FRA, have the Environment Agency allowed for a 3 metre rise in sea levels along the west coast? With this tide height at Skippool parts of Blackpool will be flooded from the west coast and Main Dyke.

With progressive increases in sea levels on this scale the proposals to build a wall on the riverbank at Wardleys and raising the embankments to prevent flooding are not practical options,

Houses on the Fleetwood Dock Estate that were the main basis for the Highways England 2009 A585 Improvement Scheme will also be inundated.

At Ipswich they have overcome a less extensive flood risk area by building a flood barrier. Applying the same methods by building a flood barrier at Fleetwood will in the long term be the cheapest and only reliable option.

The Advantages of a Wyre Flood Barrier

A flood barrier at the mouth of the River Wyre will save lives, produce renewable electricity and contribute to reducing global warming.

Whether the rise in sea levels in the River Wyre is 1 or 3 metres the cost of protecting the vast area beyond its banks will amount to only a small percentage of the value of assets at risk. A

flood barrier across the River Wyre can be designed for the downstream side of the structure wall to be increased in height to prevent flooding if sea levels rise.

A tidal range power plant within the barrier will enable the latest low head turbines to be tested leading the way to larger and more efficient tidal range plants.

It has been proven by EDF at La Rance that the river environment supports a greater amount and variety of wild life than the nearby rivers while it produces large amounts of electricity.

A tidal power plant at Fleetwood would improve the river environment and make our sea defences safe for hundreds of years or more**.**

It is widely recognised throughout the world that there is an urgent need for action to reverse global warming. The Chief Executive of the Environment Agency Sir James Bevan is a strong advocate of this policy and has made several speeches on this subject.

To help achieve his goals Sir James should direct the Environment Agency to play a lead role in using tidal range power to produce over 30% of the UKs electricity and contribute to making our sea defences safe against flooding for future generations.

Submission to the Planning Inspectorate 27 June 2019

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 21/22 – REP5- 023 Page 9/30

Highways England response to REP4 – 025 to 025.14

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. Responses to Highways England 31 May 2019 in blue type

HE. Highways England reference documents in brown type

FREE. 025.1. We refer to our letter of 27th June (copy attached) to which we have received neither acknowledgement or reply.

HE. 025.1 No Comment

FREE. 025.1. We cannot find responses to the queries set out in our letter of 27 June 2019.

It is still not clear who produced the Flood Risk Assessment (FRA). We have an email from Alexander Hazel in which one is led to understand that the Environment Agency reviewed the FRA.

No information has been produced to show how it was determined that flood mitigation of Thornton, Cleveleys and Fleetwood was unaffordable.

Although we can only imagine how flood levels at Skippool in the FRA have been determined, what we are seeking is the rationale behind these conclusions.

What basis has been used to establish the flood level during a 1 in 200 year storm?

If global warming continues, within the foreseeable future there will be extensive flooding along the River Wyre. Ian Rolands of the Environment Agency said that without a flood barrier at Fleetwood the Environment Agency could not prevent Pilling flooding. Can whoever wrote FRA let us know if they agree with this; if not is there a plan to prevent flooding?

FREE. 025.2. 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 acknowledged and would be properly considered.

FREE. 025.3. The meeting centered 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.

FREE. 025.4. 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

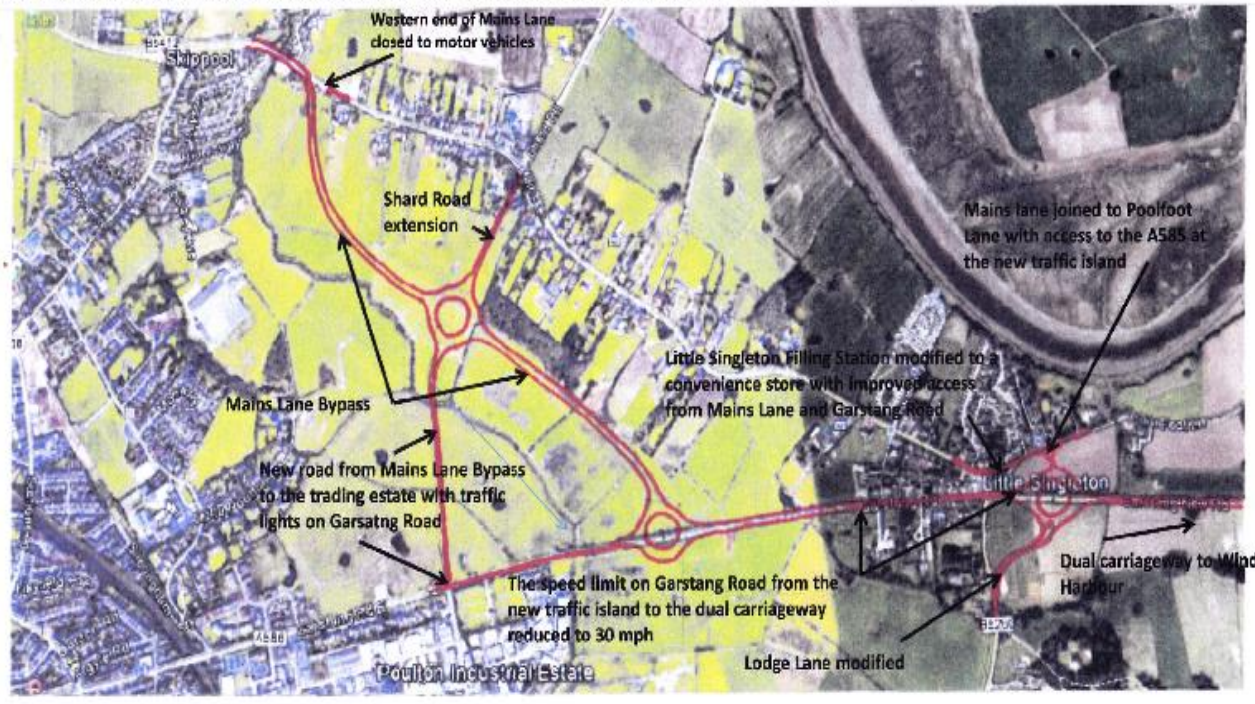
HE. 025.2 to 025.4. The traffic model has accounted for pedestrians using the controlled crossings within each cycle, however in reality this is unlikely to occur as frequently and will only be used when required. The total time modelled for each cycle is 120 seconds. Widening Garstang Road was assessed previously following Mr Greenwood's proposal during non-statutory consultation and was found not to perform better than the proposed scheme, refer to Section 5.8 in Appendix M of the Consultation Report (document reference TR010035/APP/5.1). In addition, the proposal would require acquisition of frontages of several properties and would have negative effects in terms of noise and air quality.

FREE. **025.2 to 025.4**. Option G layout shown below would have many advantages over Option 1 which were not taken into consideration by Highways England. The analysis Pages 101,102 and 105 of the Stage 2- Scheme Assessment Report makes a number of questionable judgements.
It is difficult to understand why Option G journey times from Windy Harbour to Skippool are 61% slower than Option 1 and 6% quicker between Skippool to Windy Harbour. Our analysis is that an Option 1 Journey time would be 50 seconds quicker which will result in arriving at the stopped traffic lights sooner. The cost of compensation for rebuilding a few houses is far less than the expense of the bypass to avoid Little Singleton. The loss of beautiful countryside, additional CO2, pollution and noise far outweigh any advantage in building the bypass.
The analysis on Page 105 accesses journey times as the major factor in selecting the best route. With Option G only marginally slower, less susceptible to congestion and with less impact on the wider environment. There is a case for making Option G the preferred Option!

Windy Harbour to Skippool Link Road with improved Poulton Access

There is a belief amongst Councillors and Officials that unless one of the options prepared by Highways England is accepted, improvements to the A585 will not take place. It follows that the consultation is a time wasting exercise unless all the rational options are given careful consideration.

The above plan gets round the disruptive and expensive Lodge Lane underpass in Option 1 and the Shard Road extension provides direct access to the new Mains Lane Bypass and Garstang Road. As a consequence the volume of traffic currently using the centre of Poulton would be significantly reduced. Under this arrangement traffic from Shard Road would not cause the excessive congestion Skippool roundabout that will arise if Option 1 is applied. An alternative route could be made from Shard Road via Mains Lane to the Bypass on agricultural land, but it would not have comparable traffic flow benefits. With the western end of Mains Lane closed to motor vehicles, traffic to and from the new roundabout at Little Singleton would be negligible. The plan would make a greater contribution to improving road access to the coast at a lower cost than any of the options under consideration.



Had Option G been implemented it would have given improved access to the bypass from the trading estate at Aldon Road, Bracewell Avenue and Shard Road. It would have reduced traffic in Poulton Centre and eliminated the need for Skippool Bridge Junction that will cause gridlock on Amounderness Way to a greater extent than the present Shard Road Junction.
It would avoid the need for the expensive underpass and irreversible environmental damage to the countryside. The money saved would be more than adequate to compensate the few residents with small front gardens to build new properties on a small portion of the 30 acres that will no longer be needed for the bypass.
This scheme was suggested before the application for building 520 houses on Garstang Road was submitted. Although developers will benefit from increased house sales, Garstang Road will become more hazardous with the additional access roads.

FREE 025.5. 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

HE. 025.5. As previously conveyed to Mr Greenwood, the perceived delays along Amounderness Way are not due to the single carriageway as this section is currently operating at around 80% capacity. It is the 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 as part of Highways England Asset Renewal Programme, will alleviate congestion along this section of highway.
The length of Amounderness Way from the western end of the Scheme to Norcross Junction is about 1.6km but is outside the Scheme remit. Upgrading it to dual carriageway would require the existing road embankment to be widened by between 12-18m. The amount of widening to the east and west of the existing road alignment would vary to minimise impacts on existing constraints. The upgrading to dual carriageway would also require widening of the bridge over the unused Poulton to Fleetwood branch line railway. At the northern end of this section, approaching Norcross Junction, the available highway corridor is constrained by properties and screening trees on both sides of the road.
Widening the carriageway and associated embankments at the northern extent of Amounderness Way on the approach to Norcross junction would be of concern to the Environment Agency, as around 650m lies within Flood Zone 3.

FREE. 025.5 As previously discussed with Highways England there is congestion on Amounderness Way 7 days a week. At peak times an east bound queue forms on Amounderness Way back to Norcross Junction and beyond. Highways England believes the queue is formed by vehicles turning right into Skippool filling Station but this is a minor contributor to the congestion. If the Scheme goes ahead a single eastbound vehicle entering the filling station will stop traffic on both carriageways of the bypass for over 15 to 20 seconds delaying journeys for over 40 vehicles.
A cumulative tailback similar to that at Shard Road will begin at Skippool traffic lights and being 1000 metres nearer to Norcross, the queue will extend far beyond this junction at times and to Victoria Road.
The proposed Skippool crossroad and “U” turn controlled by traffic lights with a nominal 120 second total cycle period will be more restricting than the present Mains Lane/Shard Road Junction.
Widening Amounderness Way at Skippool and Norcross junctions will only allow 50 of the 150 vehicles in the queue to eneter the bypass in the portion of the cycle time available. During this and the intervening period when movements take place from Skippool Road, Breck Road and the “U” turn, the queue will be maintained or grow.

A similar amount of congestion will arise when vehicles from Windy Harbour, Shard Road and vehicle making a "U" turn accumulate at Skippool over the 120 second cycle period..
When the A585 was built it was my understanding that the embankment was built for a 4 lane road. I have prepared and submitted drawings showing that Amounderness Way at Bourne Way was made into a 24 metre wide 4 Lane road. The concern about the railway bridge can be overcome and the trees at Norcross removed.
If the dog walking company arranges to use an alternative field for exercising dogs, as the must do during the current work the excessive congestion for commuters can be overcome.
Although the low lying land is only 4 metres AOD 650 metres from Norcross it is above the flood plain for half this distance. Beyond the 650m point the ground increases in height to over 9m AOD.
Less than 300m of the 1600m will need significant additional work to raise the standard of the existing A585 to that of the proposed bypass.

FREE. 025.6 This is without making reference to Mr Greenwood's proposals as regards the changed design for the roundabout at Norcross Road/ Amounderness Way.

HE. 025.6 Noted

FREE. 026.6 The present Junction modification will not significantly reduce gridlock to the coast and the added traffic from the Norcross housing and retail developments. These and other developments are not included in Wyre's SoCG which must affect traffic flow predictions by Highways England. As traffic volumes increase the present junction modifications will need to be improved.

FREE. 025.7 However, the wider concerns of FREE relate to flooding (as was highlighted in our letter of 27th June)

HE. 025.7 Noted

FREE. 025.7 Refer to HE. REP 2 063.5 and FREE. TR010035/APP/5.2 above

FREE. 025.8 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.

HE. 025.8 As documented in the Deadline 2 submission of the Flood Risk Assessment (FRA) (document reference TR010035/APP/5.2 – Rev 1) tidal floodwater levels for the Wyre Estuary have been supplied by the Environment Agency. The data represents water levels during a 0.5% annual exceedance probability event, inclusive of an allowance for climate change to the year 2120, that is based on the findings of the most current UK Climate Impacts Programme 2018 (UKCP18) research, published in November 2018. The UKCP18 scenario applies an increase of 1.253m on the 0.5% AEP present day tidal boundary in the Wyre Estuary, and this margin of uplift has been agreed as appropriate by the Environment Agency

FREE. 025.8 The environment Agency accepts that predictions for rising sea levels over the next 100 years are not an exact science.
Experts at the recent Sea Change Conference at the Winter Gardens in Blackpool predicted that sea levels will rise by 2 metres and the consensus of opinion is that storms will become more frequent and powerful.
The FRA states that in 100 years tides 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 a Highest Astronomical Tide (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

The Chief Executive of the Environment Agency Sir James Bevan is most concerned about climate change and advocates that officials should be honest with people. The FRA does not convey the risks for residents and road or the opportunities to combat global warming.

A flood barrier at Fleetwood would deal with many of the problems and present opportunities to contribute to reducing global warming.

FREE 025.9 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.

HE. **025.9** The Scheme has been subject to a detailed FRA (document reference TR010035/APP/5.2 – Rev 1) that fully defines existing (baseline) flooding from rivers, tides, surface water, groundwater and artificial sources, and quantifies any changes the Scheme causes. The FRA has been prepared using multiple sources of information, including data from Environment Agency reviewed and approved models of the Main Dyke and Horsebridge Dyke and of the Wyre Estuary and the floodplains of these waterbodies. The FRA has been thoroughly reviewed by the Environment Agency and relevant Lead Local Flood Authorities, who have agreed the geographical extent of our study areas and modelling coverage, approved the assessment methodologies as robust, and signed off the findings and conclusions of the assessment

FREE. 025.9 Refer to FREE. 025.8

FREE. 025.10 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 River Wyre that is and has been the subject of FREE's previous representations.

HE. **025.10** A flood barrier at the mouth of the River Wyre at Fleetwood is not a Scheme that has guaranteed funding or planning approval. It is therefore not considered appropriate to include for the effects of such a project on flood levels in the Wyre, as part of the submitted FRA. The FRA has been reviewed and approved by the Environment Agency (the government statutory body responsible for environmental protection in England) as appropriately scoped and technically robust.

FREE. 025.10 Refer to FREE. 025.8

FREE. 025.11 Please let us know, at your earliest convenience, what considerations have been given to these wider implications and to the protection of the North Fylde against those predicted floods.

HE. 025.11 It is not within the remit of the A585 Windy Harbour to Skippool Improvement Scheme to provide strategic flood protection measures to serve North Fylde. The Scheme has been designed and would be operated to ensure that its users are safe from all forms of flooding during its lifetime. Several elements of the Scheme design also deliver benefits in terms of reducing existing local flood risk. For example, flooding from the Main Dyke is reduced by replacing a twin culvert with an open span bridge at the A585 crossing. A low flood wall east of Skippool Roundabout benefits 22 existing properties by reducing baseline flood levels at these locations during the 0.5%AEP tidal flood event.

FREE. 025.10 Refer to HE. REP - 2 063.5 and FREE. TR010035/APP/5.2 above

FREE. 025.12 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 estimates value of 0.5% of the cost of building the flood barriers.

HE. 025.12 As noted in the response above, it is not within the remit of the A585 Windy Harbour to Skippool Improvement Scheme to provide strategic flood protection measures to serve Thornton, Cleveleys and Fleetwood.

FREE refer to FREE. 025.8

FREE. 025.13 It is not appropriate to burden this letter with further detail, but your early response will be appreciated.

HE.025.13 Noted.

FREE 025.14 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.

HE. 025.14 Noted.

Submission to the Planning Inspectorate 27 June 2019

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 21/24 – REP5- 023 Page 9/30
Highways England response REP6 – 028.1 to 028.5 HE 7.25 Page 12/19

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. Responses to Highways England 31 May 2019 in blue type

HE. Highways England reference documents in brown type

FREE. 028.1 At our meeting in Manchester on 23 November 2018 with David Hopkins, Layla Beckett, Sucha Panesar and Helen Batey, we raised several items that we were told were outside the Remit for the bypass. Although it was not minuted Dr Powell and I were advised to submit these matters as a Representation to the Planning Inspectorate as an Interested Party. This we did but were later advised that Norcross Junction etc were not part of the examination and we did not submit the above as a Representation in Deadline 4. To cover the wider issues please would you include the following as our Deadline 5 Representation?

HE. 028.1 The Applicant responded to Mr Greenwood following the meeting held on 23 November 2018, and the further information which was requested was provided. Mr Greenwood / Fleetwood Renewable Energy Enterprise have made numerous representations via the Planning Inspectorate, to which the Applicant has provided responses on all occasions.

FREE 028.1 Refer to HE. REP5 023 – 025.1

Norcross and Skippool

FREE. 028.2 Junctions Highways England's preference for traffic lights causes delays whilst larger roundabouts can keep traffic flowing even at peak periods. This can be seen at numerous traffic islands and Junctions 3 and 4 on the M55 Motorway are good examples. Junction 4 takes heavy traffic to and from Blackpool with minimal delays throughout the year. At peak periods after traffic has entered the A585 from Junction 3 congestion arises as a consequence of traffic lights at Windy Harbour; beyond this point the slow moving queue is further impaired by Little Singleton junctions traffic lights.

The size of a roundabout relative to the volume of vehicles is a critical factor in optimising traffic flow at junctions. If Amounderness Way is clear of standing traffic the delays that occur between Windy Harbour and Little Singleton are not repeated at Skippool traffic island. Traffic flows freely round this junction even though more vehicles have joined the A585 from Shard Road than leave it at Little Singleton.

Is it possible that if Highways England's analysis had included the cost of more land for a larger roundabout their programme would have confirmed the generally accepted view that traffic islands improve traffic flow?

The analysis of the proposed Skippool Junctions on Sketch No 2 that I gave to David Hopkins based on a 190 cycle period is disruptive to traffic flow and will cause a tailback beyond Norcross. Highways England's

cycle period of 125 seconds creates a worst case scenario and will result in tailbacks to Victoria Road. On the other hand the traffic island in Sketch No 5 will improve traffic flow for all roads to and from Skippool Junction and avoid a complex "U" turn shown on the attached Arcadis drawing modified in December 2018.

Our sketches are drawn on Google maps and therefore can be scaled using the Programme Ruler. Sketch No 10 shows an alternative Norcross Junction. With this arrangement over 90% of the work can be completed whilst vehicles on the existing roads continue to flow as normal enabling the work to be done more efficiently. The major disruption anticipated by Highways England for the modified traffic island would not occur.

Norcross Vets land used for the new road could be compensated with land acquired surplus to requirements north of the existing carpark.

If manually operated traffic lights are installed at road crossings for the small number of non-motorised users; unnecessary 24/7 stoppages of motorised traffic can be avoided.

The smallest road radius shown on our sketch is significantly greater than that on the attached Arcadis drawing of Skippool Junction. The extra cost of land and property to achieve this would be money well spent in preventing delays at this junction.

Given the location of Walkies Thornton on Sketch N0 10 it would appear that the business will not be affected by a larger traffic island. If the larger traffic island is on the field used for exercising dogs the worst case is that an alternative nearby field may have to be used. This is a minor inconvenience if improving Norcross Junction reduces journey times for almost 50% of the commuters in Wyre Borough.

Turning to the proposed bypass there is an argument that the A585 beyond Skippool should have been included in the Improvement Scheme.

Unfortunately the bypass and improvements beyond Skippool are considered as separate items defeating the goal of reducing gridlock and boosting the economy which was the aim of the Masterplan.

It is 8 months since we submitted the attached Sketch Nos 6 and 7 which clearly shows that Amounderness Way can be made into a 4 lane road with land to spare for a cycle way. To date there has not been a rational argument why this improvement cannot be made

A new Norcross roundabout can be made as shown on Sketch No 10 that would improve traffic flow to all roads at this junction and Amounderness Way made into 4 lanes as set out above. As this work is not included in the Remit for the bypass; Highways England are unable to coordinate the work to improve road network across the whole area.

The Fleetwood and Thornton Area Action Plan (AAP) included minor alterations to several junctions to handle increased traffic from housing developments. If the work had been completed as planned in 2008 this would not have significantly reduced A585 congestion

The attached documents listed below are based on existing junction traffic light cycle times and the pros and cons of the different arrangements
Sketch No 2. The proposed traffic light cycle time of 125 seconds and the complexity of these junctions will make delays greater than the Shard Road Junction creates with a tailback from Skippool to beyond Norcross Junction every day of the week.

Sketch No 5. A large traffic island similar to this arrangement with traffic light control at peak periods would improve flow rates 24/7.

Sketch Nos 6 & 7. These views from Google maps are to scale and show that the designers of the road over 50 years ago had the foresight to arrange that the land for a future road was wide enough for a 4 lane highway.

Sketch No 10. Norcross junction can be arranged to cope with additional traffiic to and from the coast at Fleetwood, Cleveleys and Bispham

U Turn Modifications. This arrangement will cause gridlock when a number of large vehicles arrive from the east to make a "U" turn

A Shard Road extension to the bypass would avoid the inevitable delays that will arise due to the complex Skippool Bridge Junction.

Garstang Road can be modified to cope with all the traffic movements without the expense and environmental disturbance of the bypass under Lodge Lane.

There is an argument that in considering the options for road improvements the wider aspects of the areas problems and opportunities should be taken into consideration.

HE. 028.2 The points raised by Mr Greenwood have been responded to by the Applicant on previous occasions throughout the examination period. Refer to the following responses made by the Applicant which addresses all the comments raised;

HE. RR-010 in Comments on Relevant Representations (document reference TR010035/APP/7.9)

FREE RR-010. Refer to RR-010 above

REP2-063 in Comments on Written Representation (document reference TR010035/APP/7.18

FREE REP2. Refer to REP3 above

REP3-016 in Comments on Written Representations Received at Deadline 3 (document reference TR010035/APP/7.21)

FREE REP3. Refer to REP4 above

REP4-025 in Responses to Representations Received at Deadline 4 (document reference TR010035/APP/7.23)

FREE REP4. Refer to REP5 Above

FREE. 028.3 Objections to Regeneration by improving the A585

We were unable to hear Ewa Sherman's response at the Oral Hearing on 5 July 2019 that the bypass did not meet the aims of the Fylde Coast Highways and Transport Masterplan (FCHTMasterplan).

Having listened to the recording, Ewa referred to the ten objectives listed by Highways England in their 4.1 Statement of Reasons for the bypass Scheme. This interpretation has resulted in a different view of the priorities to those envisaged by Lancashire County Council and the South Pennines Route Strategy document.

The aims of the FCHT Masterplan are set out in the link and attached below https://www.lancashire.gov.uk/council/strategies-policies-plans/roadsparking-andtravel/highways-and-transport-masterplans/fylde-coasthighways-and-transport-masterplan. The first paragraph states: "Lancashire County Council and Blackpool Council have unveiled a Masterplan which outlines plans to transform the road, rail, tram and cycle networks on the Fylde Coast. The proposals aim to boost the economy, reduce gridlock on the roads and support healthy lifestyles over the coming decades in Blackpool, Wyre and Fylde".

The FCHTMasterplan is set out in this link and attached below https://www.lancashire.gov.uk/media/768230/Appendix-A-Fylde-CoastHighways-and-Transport-Masterplan.pdf. The bypass will result in gridlock increasing from Skippool to beyond Norcross Junction and contribute to Fleetwood being the only town across the Fylde in decline. Can it be that the A585 improvements are based on misconceptions set out in the Masterplan Priority Analysis? This is contrary to the aims set out on page 20 of the Masterplan which envisages sustainable economic growth for the whole of Lancashire.

The submission by Wyre Council on page 9 of the FCHTMasterplan gives a false impression of prosperity in Fleetwood. As a result the need for improvement was ignored in preparing the Remit for the bypass

The plan devised by Wyre Council and Highways England for the 2009 A585 improvement scheme was to alter 12 junctions. The Windy Harbour Junction alteration was one of the 3 junctions that were modified and in its present form it is widely thought to be a death trap. At the above Hearing John Ditchfield clearly expressed the hazards at this junction.

A holistic view of the A585 should include the road beyond Skippool and Norcross Junction if a realistic view is to be taken of economic development of the coast.

Throughout the Country it is widely agreed that large traffic islands including those adjacent to motorways controlled with traffic lights at peak periods work better 24/7 than crossroads with traffic lights. Highways England published articles to this effect but the A585 is to be encumbered with crossroads. Can it be that the A585 junctions were designed before Highways England realized that crossroads cause delays? Having spent so much money on the consultant's fees to produce plans is there a reluctance to modify and improve the Scheme?

The bypass is intended to reduce gridlock between Windy Harbour and Skippool. If, after spending £150 million plus and ruining large areas of our countryside; a longer traffic queue between Skippool and Victoria Road is formed; the project will be a failure for most of Wyre's residents

HE. 028.3 Lancashire County Council has indicated that it is satisfied that the Applicant has accurately identified the Development Plans and Transport Plans currently in place for each of the local authorities against which the proposed development falls to be assessed.
It should be noted that the planning status and quantum of future developments were provided by Fylde Borough Council and Blackpool Council in November 2017.
However, Wyre Council was unable to provide the planning status and quantum of future developments within the Wyre Council area and suggested that the Applicant prepare this information based on the Wyre Local Plan.
Assumptions were therefore made by the Applicant regarding the level of certainty, timing, quantum, land-use and trip rates of the developments included in the Stage 3 A585 Uncertainty Log in the Wyre Council Local Authority area. Furthermore, the Applicant carried out a review of the Wyre adopted plan and has

now satisfied Wyre Borough Council's requirements (refer to the SoCG with Wyre (document reference TR010035/APP/8.4)).

Refer to responses to REP4-038 and REP4-033.1 in Responses to Representations Received at Deadline 4 (document reference TR010035/APP/7.23).

FREE 028.4 Junction 3 on the M55 has a large traffic Island where vehicles enter the A585 at a rate of 1 per second. There is a plan to install automatic traffic lights to improve access to the roundabout from two of the entry roads where there is a high density of vehicles on the traffic island at peak periods. This will avoid the 24/7 delays experience when Highways England spent over £300m controlling junctions with traffic lights.
When vehicles from Junction 3 reach Windy Harbour the exit time can increase to 4 seconds per vehicle. The new traffic lights at this junction have failed they caused excessive delays for several days and the junction arrangement is considered to be dangerous
If when Windy Harbour was modified a large traffic island had been built with automatic traffic lights at peak periods, speed cameras and manual controlled lights for the occasional pedestrian or cyclists the current hazards would not have arisen.

FREE 028.4 Flood Risk Assessment Report

Item 2.4.1 on Page 5 of the Arcadis Flood Risk Assessment states: "The report has been informed by a number of data sources which Arcadis believe to be trustworthy. Arcadis is unable to guarantee the accuracy of information provided by others. The report is based on information available at the time of writing. Further details regarding the modelling assumptions and limitations are included in Section7.7 climate change but Arcadis or their advisers have not allowed for a tidal surge.

The National Oceanographic Centre Model shows that there can be a tidal surge of 2.5 metres along this coast. In 1977 there was a tidal surge of 1.7 metres and if this is added to an estimated spring tide in 100 years the road would be flooded to a considerable depth. A severe storm now could flood the road by over a metre.

Sketch No SSA 2100C shows that with global warming and a tidal surge at Skippool Junction the bypass will be flooded to a depth of over 2 metres

Can this be one reason that Arcadis are not confident about the information provided by their "trustworthy" advisers but whose advice appears to us to be founded on incomplete information?

We have repeatedly requested the names and contact details of the sources on whose information Arcadis relied but this information has not been provided. We repeat this request.

Fleetwood Dockside is over a metre higher than the road at Skippool Junction but it has been flooded in the past. When sea levels rise new houses on the Dock will be flooded as indicated on Sketch No SSA 2102A

With rising sea levels several points along the River Wyre embankments will not be high enough to prevent flooding during a 1 in 200 year storm. The Environment Agency has said that they could not prevent Pilling flooding without a barrier across the river at Fleetwood.

The Intergovernmental Panel on Climate Change (IPCC) 30 years ago through its chairman Sir John Houghton predicted the heavy rainfall that we are now experiencing. It is inevitable there will be heavy rainfall during a high tide will result in a tidal lock flooding vast areas. The 2 to 3 metres of flood water shown on Sketch No 2100C should be considered the minimum levels in assessing sea defences along the River Wyre.

To deal with this risk Wyre Council have produced a Multi-Agency Flood Plan so that where possible people and property at risk will be protected. This procedure is included in the FRA but experience has shown that predicting tidal flooding along our coast is almost impossible.

High tides occur at or near weekends with biggest tides usually about midnight when hundreds of people are not on hand to carry out rescues. Clearly the flood plan is and expensive and unreliable arrangement.

The best and most effective method to avoid this risk is to ensure that the river banks are not over topped. This can be achieved with a flood barrier at Fleetwood which will be self - funding and create a reliable method of saving lives and property.

HE. 028.4 During preparation of the Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1), the Applicant has been advised by several Technical Officers with different specialisms at the Environment Agency. Our central contact has been Mr Alex Hazel, Planning Advisor | Sustainable Places – Cumbria and Lancashire. Email: CLPlanning@environment-agency.gov.uk.

The Environment Agency has advised on allowances for the effects of climate change on tidal flood conditions. The methodologies of assessment, conclusions of the Flood Risk Assessment and the flood risk mitigation measures proposed, have been reviewed and agreed by the Environment Agency, as detailed in the Statement of Common Ground (document reference TR010035/APP/8.3).

FREE 028.4 There Flood in the medium and long term has serious consequences for areas along the River Wyre. Refer to REP3 063. FREE o635

FREE 028.5 Regeneration and Climate Change

The IPCC strongly advocated the use of the tides to reduce global warming and Fleetwood is known to be the best location in Europe for a pilot plant to test the latest low head turbine technology.

Regrettably Wyre Council is opposed to this concept and relies on anecdotal evidence to support their opposition to a flood barrier which they see as environmentally problematic.

Had they accepted the invitation in June 2009 to attend the site inspection and conference hosted by EDF at La Rance; Wyre Officials would have learned that a tidal power plant is not a hazard to wild life. The Local Authority environmental experts gave lectures on their monitoring of the river and the plant and spoke of fish a metre long passing through the turbines unharmed. They also reported that control of water flow through the turbines did not disturb sediment and river water was clear which improved photosynthesis increasing river plant life and hence other wild life. As a consequence EDF's La Rance Tidal Power Plant now supports a greater amount and variety of wild life than any other river in Brittany or Normandy and this could be replicated on the River Wyre.

A Wyre Tidal Power Plant could have been built and operated now for at least the last 6 years. It would be producing enough electricity to power 100,000 cars a day and have the ability to prevent flooding from Pilling to Blackpool as sea levels rise, for hundreds of years or more. Apart from flooding from the River Wyre, Cleveleys seawall revetment is over 2 metres lower than the new Rossall seawall making it

vulnerable to over topping during storms. If the weather conditions had been slightly worse during the December 2013 storms the seawall was not high enough to prevent Cleveleys being more extensively flooded.

Whether it is this year, next year or in 100 years the River Wyre sea defences will not be adequate to prevent flooding.

Item 9.1.8 of the Arcadis Flood Risk Assessment predicts that vast areas of Thornton, Cleveleys and Fleetwood will be flooded and we are being led to believe that it will be too expensive to prevent these floods. But this conclusion does not take into account the cost of flood prevention against the value of the assets protected.

Wyre Council's policy of a sea defences retreat set out on page 31 of the Wyre Flood and Coastal defense Strategy Plan should be reviewed. It seems that officials and politicians are prepared to accept and implement this advice with no consideration to the potential losses of their rate payers

This situation can be avoided if only a small portion of the value of the tens of billions of pounds-worth of assets that can be lost is invested now by the Government before these monumental losses takes place. Unless this flood disaster is averted it will have serious consequences for residents, officials and politicians.

Conclusions

The A585 bypass scheme has numerous defects some going back to its inception and it should be rejected.

The Scheme does not meet the criteria of the of the Masterplan on which it was to be based

An alternative road off the peninsula has to be planned.

The power of the tides has to be harnessed to contribute to reducing global warming for the benefit of the whole Country

HE. 028.5 As stated, it is not within the remit of the A585 Windy Harbour to Skippool Improvement Scheme to provide strategic flood protection measures to serve North Fylde, such as a flood barrier at Fleetwood.

FREE 028.5 Without a flood barrier at Fleetwood the Scheme will be at risk of flooding in the short, medium and long term. Refer to FREE REP4 025.8