

A585 Windy Harbour to Skippool Improvement Scheme

TR010035

7.32 Responses to Representations Received at Deadline 7

APFP Regulation 5(2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
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Planning Act 2008

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

**A585 Windy Harbour to Skippool
Improvement Scheme**
Development Consent Order 20[]

RESPONSES TO REPRESENTATIONS RECEIVED AT DEADLINE 7

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ABBREVIATIONS

Abbreviations contained within this document are listed below with an indication of their meaning in the context of this Scheme.

Abbreviation	Meaning
AAP	Area Action Plan
AEP	Annual Exceedance Probability
AMCB	Analysis of Monetised Costs and Benefits
AOD	Above Ordnance Datum
AST	Appraisal Summary Table
BCR	Benefit Cost Ratio
CEMP	Construction Environmental Management Plan
COBALT	Cost and Benefit to Accidents – Light Touch
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DfT	Department for Transport
DML	Deemed Marine License
ES	Environmental Statement
ExA	Examiner appointed by the Secretary of State
FCH	Fylde Coast Highways
FCHT	Fylde Coast Highways and Transport
FRA	Flood Risk Assessment
GDP	Gross Domestic Product
HE	Highways England
IPCC	Intergovernmental Panel on Climate Change
MCAA (2009)	Marine and Coastal Access Act 2009
MMO	Marine Management Organisation
NE	Natural England
PCU	Passenger Car Unit
REAC	Record of Environmental Actions and Commitments
Rev	Revision
RIES	Report on the Implications for European Sites
RIS1	Road Investment Strategy 1
SoCG	Statement of Common Ground
SRN	Strategic Road Network
TAG	Transport Analysis Guidance
TM	Transport Masterplan
TUBA	Transport User Benefit Appraisal
UKCP	United Kingdom Climate Projections

1 RESPONSES TO REPRESENTATIONS RECEIVED AT DEADLINE 7

- 1.1.1 The purpose of this document is to set out the responses to representations received at Deadline 7.
- 1.1.2 These can be found in Table 1-1 below.

Table 1-1: Responses to Representations Received at Deadline 7

Reference Number	Written Representations	Response to Written Representation
REP7-038	Environment Agency	
REP7-038.1	We have reviewed the ExA's proposed schedule of changes to the draft Development Consent Order (published on 10 September 2019) and, insofar as it relates to our remit, we have no comments to make.	Noted, no further response required.
REP7-039	Fleetwood Renewable Energy Enterprise 2007	
REP7-039.1	<p>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.</p> <p>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)</p> <ul style="list-style-type: none"> • 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. <p>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</p>	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.
REP7-039.2	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.	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 Number	Written Representations	Response to Written Representation
	<p>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</p> <p>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</p> <p>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)</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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</p>	<p>reference TR010035/APP/7.4). There have been numerous liaisons between the Applicant and Wyre Council and 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).</p>

Reference Number	Written Representations	Response to Written Representation
	Report should be reviewed. There is an argument that there is an economic case for improving the A585 towards Fleetwood.	
REP7-039.3	<p>FREE. 10.3 The effect of the bypass will be to move the long delays at Little Singleton to Skippool.</p> <p>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.</p> <p>FREE 10.3 Appendices F and H do not prove that congestion will not be moved to Skippool.</p>	<p>Appendix H of the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12) states the following in section 4.4.8;</p> <p><i>“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”.</i></p> <p>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.</p> <p>Similarly, long delays and queues (70+ vehicles) are predicted at the existing Little Singleton junction without an intervention.</p> <p>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.</p> <p>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.</p>
REP7-039.4	<p>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.</p> <p>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</p>	<p>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.</p> <p>Also refer to drawings HE548643-ARC-GEN-SZ_ZZ_000-DR-D-4046 and HE548643-ARC-</p>

Reference Number	Written Representations	Response to Written Representation
	<p>another.</p> <p>FREE 10.4 When the Norcross and Skippool Junction modifications are completed the traffic tailback from Skippool will continue to cause delays.</p>	<p>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.</p>
REP7-039.5	<p>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.</p> <p>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.</p> <p>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?</p> <p>Highways England was involved in the preparation of Fleetwood and Thornton Area Action Plan and congestion problems continue. Refer to FREE 10.2 above</p>	<p>Refer to response to REP7-039.2 above.</p>
REP7-039.6	<p>FREE. 10.6 Cardiff like Fleetwood had been in decline for decades when the Council took steps to dedesignate 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 wildlife 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.</p> <p>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.</p> <p>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.</p>	<p>Refer to response to REP7-039.2 above.</p>
REP7-039.7	<p>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</p>	<p>Refer to response to REP7-039.2 above</p>

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	<p>planners as an ineffective document to bring about the Town's regeneration.</p> <p>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.</p> <p>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.</p> <p>HE. 10.7 Refer to response RR-10 (10.6)</p> <p>FREE 10.7 Refer to Response RR – 10.6</p>	
REP7-039.8	<p>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.</p> <p>HE. RR 10.8 Refer to response RR-10 (10.6)</p> <p>FREE. 10.8 Refer to Response – 10.6</p>	Refer to responses to REP7-039.1 and REP7-039.2 above
REP7-039.9	<p>FREE. 10.9 The Plan to turn the Town's industrial housing estates has increased commuters on the A585.</p> <p>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.</p> <p>HE 10.9 Noted – no response required.</p> <p>FREE Refer to Response RR – 10.6</p>	Refer to response to REP7-039.2 above
REP7-039.10	<p>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.</p> <p>HE 10.9 Noted – no response required.</p> <p>FREE See Response RR – 10.6</p>	Refer to responses to REP7-039.1, REP7-039.2 and REP7-39.4 above.
REP7-039.11	<p>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</p>	Noted, no further response required.

Reference Number	Written Representations	Response to Written Representation
	<p>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.</p> <p>HE. 063.1 The Applicant notes and has had regard to the comments made.</p>	
REP7-039.12	<p>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.</p> <p>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.</p> <p>HE. 063.2 The Applicant notes and has had regard to the comments made.</p> <p>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.</p> <p>The implication of HE's response acknowledges that the 2009 Transport Strategy failed to address the problem. Refer to FREE. RR-010.2</p>	Refer to response to REP7-039.2 above.
REP7-039.13	<p>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.</p> <p>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.</p> <p>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</p>	Noted.

Reference Number	Written Representations	Response to Written Representation
	<p>two lanes to one over a short distance on Fleetwood Road tends to create conflict and is a hazard for drivers.</p> <p>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.</p> <p>HE. 063.3 One of the objectives of the Scheme is to realise the benefits of the Windy Harbour junction improvements.</p> <p>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.</p> <p>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).</p>	
REP7-039.14	<p>HE. 2.9 Economic Case</p> <p>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.</p> <p>FREE. 2.9 .1. This excludes any consideration of an economic contribution beyond Skippool.</p> <p>2.9.2 The impacts of the Scheme are recorded in the Appraisal Summary</p>	<p>The benefits realised by the Scheme are achieved over a wide geographic area, as set out in the Combined Modelling and Appraisal Report, Chapter 13 and Appendix G (document reference TR010035/APP/7.12), however the capital expenditure is limited to the Scheme costs and commitments. Refer to the following representation responses; RR-001 1.1, RR-001 1.2, REP-004 4.1, REP1-015.1, REP1-017.4, REP4-033.3 for further details.</p>

Reference Number	Written Representations	Response to Written Representation
	<p>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.</p> <p>FREE. 2.9.2. Refer to 2.9.1</p> <p>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.</p> <p>FREE. 2.9.3. Refer to 2.9.1</p> <p>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.</p> <p>FREE. 2.9.4. Refer to 2.9.1</p> <p>2.9.5 The Scheme benefits broadly comprise the following:</p> <ul style="list-style-type: none"> • Road user benefits – savings in travel time and vehicle operating costs as a result of the Scheme <p>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.</p> <ul style="list-style-type: none"> • Safety benefits – due to changes in the number and/or severity of accidents as a result of the Scheme <p>FREE. An average reduction of half an accident and 2 casualties per year is insignificant with those that take place beyond Skippool</p> <ul style="list-style-type: none"> • Construction and maintenance (dis)benefits – due to changes in travel time and vehicle operating costs during the Scheme construction and maintenance <p>FREE. Delays and delay cost will be increased beyond Skippool.</p> <ul style="list-style-type: none"> • Environmental impacts – due to changes in greenhouse gas emissions, air 	

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	<p>quality and noise levels as a result of the Scheme</p> <p>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</p> <ul style="list-style-type: none"> • 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 <p>FREE. These costs will be higher with the bypass instead of altering the existing roads</p> <ul style="list-style-type: none"> • Journey time reliability impacts – due to changes in the journey time variability in the network as a result of the Scheme <p>FREE. Journey time from the coast will be increased with the bypass instead of altering the existing roads</p> <ul style="list-style-type: none"> • Distributional impacts as a result of the Scheme <p>FREE. Overall Negative Impact increased with the bypass instead of altering the existing roads</p> <ul style="list-style-type: none"> • Social impacts as a result of the Scheme <p>FREE. Overall Negative Impact with the bypass instead of altering the existing roads</p> <ul style="list-style-type: none"> • Wider Impacts as a result of the Scheme <p>FREE. Overall Negative Impact with the bypass instead of altering the existing roads</p>	
	<p>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.</p> <p>FREE. 2.9.6 Does this imply that the £150m estimated cost is based on 2010 prices?</p>	<p>The last approved cost estimate was prepared using Q1, 2016 prices and then inflated to outturn using the Applicant's project construction related inflation based on an expenditure profile developed for the cost estimate.</p> <p>The cost estimate £154.5m, as detailed in the Funding Statement (document reference TR010035/APP/4.2), is then rebased to 2010 prices for economic calculations, using the GDP-deflator series as published in the WebTAG Databook.</p>
	<p>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</p>	<p>All evidence of improved traffic flows has been outlined in the Combined Modelling and Appraisal Report (document reference TR010035/APP/7.12).</p> <p>The article that is referenced in 2.9.7 refers to Highways England Motorway Junction Improvement Schemes, in particular ramp metering, and therefore has no relevance to the Scheme.</p>

Reference Number	Written Representations	Response to Written Representation
	<p>definition time periods including weekday morning, inter-peak, evening and off-peak periods and the weekend period.</p> <p>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.</p> <p>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.</p> <p>FREE 2.9.8 Refer to 2.9.7</p> <p>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.</p> <p>FREE 2.9.9. The indications are that weekend assessments were not carried out. See 2.9.7 to verify</p> <p>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.</p> <p>FREE 2.9.10 Refer to 2.9.8</p>	
	<p>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</p> <p>FREE. 2.9.11 Are these estimates too small to quantify?</p> <p>2.9.12 The scheme reduces severance for non-motorised users including walkers, cyclists and horse riders and improves access across the existing</p>	<p>The Monetised Safety Assessment: Accident Cost Savings, found in the Transport Assessment (document reference TR010035/APP/7.4) are derived using COBALT which has been developed by the Department for Transport, to undertake the analysis of impacts on accidents as part of the economic appraisal of road schemes. A summary of the Scheme casualties can be found in Table 6-4 of the document. Over the 60-year assessment period, the COBALT output indicates that 8 fatalities, 41 serious and 71 slight casualties will be avoided as a result of the Scheme introduction, compared with no Scheme being provided.</p>

Reference Number	Written Representations	Response to Written Representation						
	<p>A585.</p> <p>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</p> <p>2.9.13 An 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.</p> <p>FREE. 2.9.13 not true beyond Skippool</p> <p>2.9.14 The Scheme improves journey time and reliability.</p> <p>FREE 2.9.14 After spending £150m plus, gridlock between Windy Harbour and Little Singleton will be moved north and increased.</p> <p>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.</p> <p>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</p>							
REP7-039.15	<p>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.</p> <p>Queues from Victoria Road to Skippool Bridge will be double the length of</p>	<p>See below table comparing queue lengths on relevant approaches to Shard Road, Skippool and Norcross junctions with and without the proposed Scheme for the design year. The With Scheme results reflect the Windy Harbour to Skippool and Norcross schemes both being constructed.</p> <p>Queue lengths of 80-90 vehicles at the Shard Road and Skippool junctions in the Without Scheme model are not replicated or increased on any junction approach with the Scheme in place. Furthermore, the queues predicted at the existing Little Singleton junction without the Scheme (70 vehicles) are not replicated anywhere on the network with the Scheme in place.</p> <table border="1"> <thead> <tr> <th>Approach</th><th>AM Queues</th><th>PM Queues</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td></tr> </tbody> </table>	Approach	AM Queues	PM Queues			
Approach	AM Queues	PM Queues						


Reference Number	Written Representations	Response to Written Representation				
	<p>those from Windy Harbour to Skippool. This will increase gridlock to and from the coast and inhibit economic growth.</p> <p>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).</p> <p>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.</p> <p>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.</p>		Without Scheme	With Scheme	Without Scheme	With Scheme
		Shard Rd approach	80-90 vehicles	10-12 vehicles	40-50 vehicles	5-10 vehicles
		Skippool WB approach	20 vehicles	20-22 vehicles	15 vehicles	20 vehicles
		Norcross WB Approach	10 vehicles	12-15 vehicles	20 vehicles	12-15 vehicles
		Norcross EB Approach	10 vehicles	10-12 vehicles	10 vehicles	15-20 vehicles
		Skippool EB Approach	80 vehicles	20 vehicles	80-90 vehicles	30 vehicles
		Mains Lane EB Approach to Shard Rd	20 vehicles	8 vehicles	20 vehicles	14 vehicles
<p>As per analysis undertaken during the development phase operational assessments, with the exception of very short periods on some approaches to the Skippool junction, all queues in the With Scheme model clear within a single cycle, meaning delays are limited to the non-green time waiting at signals. This makes any delays predictable and limited. Queues at the existing Skippool and Norcross roundabouts in the Without Scheme model represent significant congestion delay, and unreliable journey times due to a lack of signal control. The modelling of the proposed signalised junctions was also undertaken without ‘linking’ the junctions, which would be the case on the ground. This gives an additional layer of control in terms of limiting the throughput of traffic towards junctions experiencing congestion, and can prioritise the clearance of queues on certain movements.</p>						
REP7-039.16	<p>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.</p> <p>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</p>	<p>The Flood Risk Assessment (document reference TR010035/APP/5.2 – Rev 1) meets the requirements of the National Planning Policy Framework Flood Risk and Coastal Change guidance (Ministry of Housing, Communities and Local Government, 2014), demonstrating that:</p> <p>The scheme has been designed to be safe for its lifetime, without increasing flood risk elsewhere and, where possible reduce flood risk overall.</p> <p>The scheme contributes to a reduction in flood extents from the Main Dyke (by replacing an existing twin culvert arrangement with an open span crossing), and during the 0.5% AEP tidal flood event, reduces the risk of tidal flooding of a number of properties between Breck Road and the Main Dyke.</p>				

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	<p>have no responsibility for any loss of land and property.</p> <p>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.</p> <p>The bypass will not meet the criteria of reducing gridlock and increase economic growth which is the stated aim of the Fylde Coast Highways and Transport Masterplan.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>To confirm our understanding of the flood risks we have carried out survey along the river which we have summarized below: -</p> <p>Flood Risk Assessments</p> <p>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</p> <p>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</p> <p>sea levels will rise by 2 metres and the consensus of opinion is that storms will become more frequent and powerful.</p> <p>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</p>	<p>It is acknowledged that due to the predicted effects of climate change, flood risk will increase over the lifetime of the scheme. The UK Climate Projections 2018 (UKCP18), from the Met Office Hadley Centre Climate Programme, which is supported by the Department of Business, Energy and Industrial Strategy and the Department for Environment, Food and Rural Affairs are the most up-to-date predictions of change over the 21st century. With Environment Agency agreement, it is this reference source of data that has been used to derive the climate change allowances adopted in the Flood Risk Assessment (FRA).</p> <p>It is not within the remit of the Applicant to provide for strategic flood risk management / energy generation solutions, such as a tidal barrage on the Wyre, nor comment on the efficacy of such a measure.</p>

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	<p>AOD to prevent extensive flooding.</p> <p>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.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>At Ipswich they have overcome a less extensive flood risk area by building a flood barrier.</p> <p>Applying the same methods by building a flood barrier at Fleetwood will in the long term be the cheapest and only reliable option.</p> <p>The Advantages of a Wyre Flood Barrier</p> <p>A flood barrier at the mouth of the River Wyre will save lives, produce renewable electricity and contribute to reducing global warming.</p> <p>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</p> <p>to be increased in height to prevent flooding if sea levels rise.</p> <p>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.</p>	

Reference Number	Written Representations	Response to Written Representation
	<p>It has been proven by EDF at La Rance that the river environment supports a greater amount and variety of wildlife than the nearby rivers while it produces large amounts of electricity.</p> <p>A tidal power plant at Fleetwood would improve the river environment and make our sea defences safe for hundreds of years or more.</p> <p>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.</p> <p>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.</p>	
REP7-039.17	<p>FREE. 025.1. We refer to our letter of 27th June (copy attached) to which we have received neither acknowledgement or reply.</p> <p>HE. 025.1 No Comment</p> <p>FREE. 025.1. We cannot find responses to the queries set out in our letter of 27 June 2019.</p> <p>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.</p> <p>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.</p> <p>What basis has been used to establish the flood level during a 1 in 200 year storm?</p> <p>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?</p>	<p>The FRA (document reference TR010035/APP/5.2 – Rev 1) was produced by a team of professionally Chartered hydrologists and flood modellers, in close consultation and collaboration with relevant technical experts at the Environment Agency.</p> <p>As noted in the response above, the Scheme does make a contribution to reducing flood risk locally (from the Main Dyke and the tidal Wyre), but it is not within the remit of the applicant to design a Scheme that provides for a strategic flood risk management solution to benefit the wider area of Thornton, Cleveleys and Fleetwood.</p> <p>Flood levels at Skippool have been determined using detailed hydraulic models that simulate the flood behaviours of the Main Dyke/Horsebridge Dyke, tidal Wyre and their floodplains. The models were independently reviewed and approved by technical experts at the Environment Agency.</p> <p>It is not within the remit of the applicant to comment on the efficacy of a flood barrier at Fleetwood as a flood risk management solution.</p>
REP7-039.18	<p>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</p>	<p>As previously mentioned by the Applicant, Option G would require acquisition of several properties' frontages and the amount of land take would require the Applicant to CPO the entire property. In addition, the widening of Garstang Road would increase noise and air</p>

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	<p>properly considered.</p> <p>FREE. 025.3. The meeting centred on the proposed A585 road scheme and Mr Greenwood's representations focused on traffic flow and the comparative effect of roundabouts with manually controlled crossing signals as opposed to programmed crossing signals.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>pollution to the adjacent properties.</p> <p>The planning application 15/00298/LMAJ for the housing estate was submitted in February 2015 and was approved in February 2017 and therefore prior to this Application.</p>

Reference Number	Written Representations	Response to Written Representation
	<p>There is a case for making Option G the preferred Option!</p> <p>Windy Harbour to Skippool Link Road with improved Poulton Access</p> <p>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.</p> <p>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. This new arrangement would make a greater contribution to improving road access to the coast at a lower cost than any of the options under consideration.</p>  <p>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.</p> <p>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.</p> <p>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.</p>	

Reference Number	Written Representations	Response to Written Representation
REP7-039.19	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>The top of the embankment of this section of Amounderness Way is typically between 14m and 18m wide and this is insufficient to construct a dual carriageway without the embankment being widened. The minimum width required for a dual carriageway to current Highways England standards (including allowing for the proposed cycleway) would be: Verge 2m, carriageway 9.3m (including 1m hardstrips), central reserve 2.5m, carriageway 9.3m verge with cycleway 4.5m = 27.6m. A four-lane single carriageway would not be suitable along this section of road. The Highways England design standards require a central reserve to be provided when there are more than two lanes of traffic, the introduction of a central reserve, which is required for safety, would introduce a minimum extra width of 2.5m.</p> <p>It is also noted that the carriageway of the western section of Amounderness Way and Norcross junction is within the Flood Zone 3 area at a level of about 5m above Ordnance Datum for about 450m and would therefore be more prone to flooding than the section of the A585 at Skippool junction.</p> <p>Refer to REP7-039.4 above outlining that it is Norcross junction and Skippool junction that is causing the congestion along Amounderness Way rather than capacity of the road.</p>

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	<p>Lane/Shard Road Junction.</p> <p>Widening Amounderness Way at Skippool and Norcross junctions will only allow 50 of the 150 vehicles in the queue to enter 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.</p> <p>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.</p> <p>If the dog walking company arranges to use an alternative field for exercising dogs, as they 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.</p>	
REP7-039.20	<p>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.</p> <p>HE. 025.6 Noted</p> <p>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.</p>	<p>The Norcross scheme is outside the remit of the Scheme and does not fall within the order limits.</p> <p>The Combined Modelling and Appraisal Report, Appendix F, Chapter 3 (document reference TR010035/APP/7.12) outlines how the information obtained from the Fylde and Wyre Local Plans informed the traffic modelling using an uncertainty log where Near Certain and More Than Likely developments were included in the Core model.</p> <p>Note the Wyre Borough Council Statement of Common Ground did not provide a comprehensive list, rather, it provided reassurance that the additional developments included in the final published Local Plan had been accounted for in the model (in comparison to the draft Local Plan).</p>
REP7-039.21	<p>FREE. 025.7 However, the wider concerns of FREE relate to flooding (as was highlighted in our letter of 27th June)</p> <p>HE. 025.7 Noted</p> <p>FREE. 025.7 Refer to HE. REP 2 063.5 and FREE. TR010035/APP/5.2 above</p>	Refer to response to REP7-039.16 above.
REP7-039.22	FREE. 025.8 It is the case (as we understand it) that flooding has, to some	Refer to response to REP7-039.17 above.

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	<p>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.</p> <p>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</p> <p>FREE. 025.8 The environment Agency accepts that predictions for rising sea levels over the next 100 years are not an exact science.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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</p>	

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	<p>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.</p>	
REP7-039.23	<p>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.</p> <p>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</p> <p>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</p> <p>FREE. 025.9 Refer to FREE. 025.8</p>	Refer to response to REP7-039.16 above.
REP7-039.24	<p>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</p> <p>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.</p> <p>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</p> <p>reviewed and approved by the Environment Agency (the government statutory body responsible for environmental protection in England) as appropriately scoped and technically robust.</p> <p>FREE. 025.10 Refer to FREE. 025.8</p>	Refer to responses to REP7-039.16 above.
REP7-039.25	<p>FREE. 025.11 Please let us know, at your earliest convenience, what considerations have been given to these wider implications and to the</p>	Refer to responses to REP7-039.16 above.

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	<p>protection of the North Fylde against those predicted floods.</p> <p>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.</p> <p>FREE. 025.10 Refer to HE. REP - 2 063.5 and FREE. TR010035/APP/5.2 above</p>	
REP7-039.26	<p>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.</p> <p>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.</p> <p>FREE refer to FREE. 025.8</p>	Refer to response to REP7-039.17 above.
REP7-039.27	<p>FREE. 025.13 It is not appropriate to burden this letter with further detail, but your early response will be appreciated.</p> <p>HE.025.13 Noted.</p>	Noted
REP7-039.28	<p>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.</p> <p>HE. 025.14 Noted.</p>	Feedback has been provided to Mr Greenwood, the Applicant's response was merely acknowledging the request.
REP7-039.29	<p>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</p>	Refer to above responses REP7-039.19 and REP7-039.20.

Reference Number	Written Representations	Response to Written Representation
	<p>Representation in Deadline 4.</p> <p>To cover the wider issues please would you include the following as our Deadline 5 Representation?</p> <p>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.</p> <p>FREE 028.1 Refer to HE. REP5 023 – 025.1</p>	
REP7-039.30	<p>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.</p> <p>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</p> <p>though more vehicles have joined the A585 from Shard Road than leave it at Little Singleton.</p> <p>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?</p> <p>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.</p>	<p>Again, 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;</p> <ul style="list-style-type: none"> • Comments on Relevant Representations (document reference TR010035/APP/7.9) • REP2-063 in Comments on Written Representation (document reference TR010035/APP/7.18) • REP3-016 in Comments on Written Representations Received at Deadline 3 (document reference TR010035/APP/7.21) • REP4-025 in Responses to Representations Received at Deadline 4 (document reference TR010035/APP/7.23)

Reference Number	Written Representations	Response to Written Representation
	<p>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.</p> <p>Norcross Vets land used for the new road could be compensated with land acquired surplus to requirements north of the existing carpark.</p> <p>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.</p> <p>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.</p> <p>Turning to the proposed bypass there is an argument that the A585 beyond Skippool should have been included in the Improvement Scheme.</p> <p>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.</p> <p>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</p> <p>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</p> <p>included in the Remit for the bypass; Highways England are unable to coordinate the work to improve road network across the whole area.</p> <p>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</p>	

Reference Number	Written Representations	Response to Written Representation
	<p>this would not have significantly reduced A585 congestion</p> <p>The attached documents listed below are based on existing junction traffic light cycle times and the pros and cons of the different arrangements</p> <p>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.</p> <p>Sketch No 5. A large traffic island similar to this arrangement with traffic light control at peak periods would improve flow rates 24/7.</p> <p>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.</p> <p>Sketch No 10. Norcross junction can be arranged to cope with additional traffic to and from the coast at Fleetwood, Cleveleys and Bispham</p> <p>U Turn Modifications. This arrangement will cause gridlock when a number of large vehicles arrive from the east to make a "U" turn</p> <p>A Shard Road extension to the bypass would avoid the inevitable delays that will arise due to the complex Skippool Bridge Junction.</p> <p>Garstang Road can be modified to cope with all the traffic movements without the expense and environmental disturbance of the bypass under Lodge Lane.</p> <p>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.</p> <p>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;</p> <p>HE. RR-010 in Comments on Relevant Representations (document reference TR010035/APP/7.9)</p> <p>FREE RR-010. Refer to RR-010 above</p> <p>REP2-063 in Comments on Written Representation (document reference TR010035/APP/7.18)</p> <p>FREE REP2. Refer to REP3 above</p>	

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	<p>REP3-016 in Comments on Written Representations Received at Deadline 3 (document reference TR010035/APP/7.21)</p> <p>FREE REP3. Refer to REP4 above</p> <p>REP4-025 in Responses to Representations Received at Deadline 4 (document reference TR010035/APP/7.23)</p> <p>FREE REP4. Refer to REP5 Above</p>	
REP7-039.31	<p>FREE. 028.3 Objections to Regeneration by improving the A585</p> <p>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).</p> <p>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.</p> <p>The aims of the FCHT Masterplan are set out in the link and attached below</p> <p>https://www.lancashire.gov.uk/council/strategies-policies-plans/roadsparking-andtravel/highways-andtransport-masterplans/fylde-coasthighways-and-transport-masterplan. The first paragraph states:</p> <p>"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".</p> <p>The FCHTMasterplan is set out in this link and attached below</p> <p>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.</p> <p>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</p>	<p>Noted, one of the Scheme objectives was to complement and realise the full benefits of other Operations Directorate schemes in the region, which includes the Windy Harbour traffic signalised junction. The existing Windy Harbour junction has two lanes merging to one lane within 225m of the junction, the Scheme provides a dual 2-lane road between Windy Harbour and Skippool avoiding a majority of the conflicts that are referred to.</p> <p>The changes to the M55 junction 3 is being undertaken by Highways England Operations Directorate, aalso refer to drawings HE548643-ARC-GEN-SZ_ZZ_000-DR-D-4045 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</p> <p>Also refer to response to REP7-039.14 above.</p>

Reference Number	Written Representations	Response to Written Representation
	<p>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.</p> <p>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.</p> <p>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?</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

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	<p>Wyre adopted plan and has now satisfied Wyre Borough Council's requirements (refer to the SoCG with Wyre (document reference TR010035/APP/8.4)).</p> <p>Refer to responses to REP4-038 and REP4-033.1 in Responses to Representations Received at Deadline 4 (document reference TR010035/APP/7.23).</p> <p>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.</p> <p>When vehicles from Junction 3 reach Windy Harbour the exit time can increase to 4 seconds per vehicle.</p> <p>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</p> <p>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.</p>	
REP7-039.32	<p>FREE 028.4 Flood Risk Assessment Report</p> <p>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 Section 7.7 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.</p> <p>Sketch No SSA 2100C shows that with global warming and a tidal surge at</p>	Refer to response to REP7-039.17 above.

Reference Number	Written Representations	Response to Written Representation
	<p>Skippool Junction the bypass will be flooded to a depth of over 2 metres</p> <p>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.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 an 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.</p> <p>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.</p> <p>The Environment Agency has advised on allowances for the effects of climate change on tidal flood conditions. The methodologies of assessment,</p>	

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	<p>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).</p> <p>FREE 028.4 There Flood in the medium and long term has serious consequences for areas along the River Wyre.</p> <p>Refer to REP3 063. FREE o635</p>	
REP7-039.33	<p>FREE 028.5 Regeneration and Climate Change</p> <p>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.</p> <p>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.</p> <p>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 wildlife than any other river in Brittany or Normandy and this could be replicated on the River Wyre.</p> <p>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.</p> <p>Whether it is this year, next year or in 100 years the River Wyre sea defences will not be adequate to prevent flooding.</p>	Refer to responses to REP7-039.17 above.

Reference Number	Written Representations	Response to Written Representation
	<p>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.</p> <p>Wyre Council's policy of a sea defences retreat set out on page 31 of the Wyre Flood and Coastal defence 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</p> <p>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.</p> <p>Conclusions</p> <p>The A585 bypass scheme has numerous defects some going back to its inception and it should be rejected.</p> <p>The Scheme does not meet the criteria of the of the Masterplan on which it was to be based</p> <p>An alternative road off the peninsula has to be planned.</p> <p>The power of the tides has to be harnessed to contribute to reducing global warming for the benefit of the whole Country</p> <p>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.</p> <p>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</p>	
REP7-040	Marine Management Organisation	
REP7-040.1	<p>1.0 Notification by the MMO to remain an Interested Party by the ExA</p> <p>1.1 The MMO has an interest in this project because the works, as detailed within the Environmental Statement (ES), appear to include construction activities which are proposed to take place within the UK Marine Area as defined by Section 42 of the Marine and Coastal Access Act 2009 (MCAA</p>	Noted, no further response required.

Reference Number	Written Representations	Response to Written Representation
	2009) – The Development Consent Order (DCO) application includes a draft Deemed Marine Licence (DML) under Section 65, MCAA. Should consent be granted for Page 2 of 3 the project, the MMO will be responsible for monitoring, compliance and enforcement of DML conditions.	
REP7-040.2	<p>2.0 Comments on any additional information/ submissions received by D6</p> <p>2.1. The MMO noted as part of previous responses a number of requirements prior to sign-off of the SoCG. This included an updated DML containing coordinates, which has now been received. Therefore; MMO are content that these co-ordinates appropriately capture the proposed area of works.</p> <p>2.2. The MMO also noted as part of previous responses that a number of issues remained with Natural England and the Environment Agency. The MMO note that a SoCG has now been signed off with the Environment Agency, however, have been informed by the Applicant that agreement has not yet been reached with Natural England. As the agreement with NE may have a direct impact on the MMO position in terms of potential conditions contained within a DML MMO are therefore are unable to sign off its own SoCG at this stage and will look to do so at Deadline 8.</p>	Noted, no further response required.
REP7-041	Natural England	
REP7-041.1	<p>1 Comments on the ExA's proposed schedule of changes to the Development Consent Order (DCO)</p> <p>1.1 We have no comments to make on the ExA's proposed schedule of changes to the DCO.</p> <p>1.2 We are still in discussions with Highways England regarding suggested changes to the DCO (full details in our response for Deadline 6 dated 21 August 2019).</p> <p>1.3 In response to Natural England's comments further changes to the DCO have been proposed by Highways England (email dated 18 September 2019). Natural England have not yet been able to review these DCO proposals.</p>	Noted. Suggested changes the Applicant propose to make to the dDCO were emailed to Natural England on the 18/09/2019 for review. Natural England responded on the 24/09/2019 to say that they would not be able to comment on the suggested dDCO changes by the 25/09/2019 and asked for a copy of the dDCO with the Applicant's suggested changes incorporated. This was emailed to Natural England on the 25/09/2019 for comment. Natural England confirmed that they were content with the proposed requirements on 30/09/2019. The updated dDCO (document reference TR010035/APP/3.1 – Rev 4) will be submitted at Deadline 8.
REP7-041.2	<p>2 Comments on the Report on the Implications for European Sites (RIES)</p> <p>2.1 We have reviewed the RIES dated 27 August 2019.</p> <p>2.2 Natural England thanks you for the preparation of the RIES which in</p>	Natural England's proposed changes to the dDCO have been incorporated and thus a Statement of Common Ground has now been agreed with Natural England (document reference TR010035/APP/8.1).

Reference Number	Written Representations	Response to Written Representation
	<p>general, captures our concerns well.</p> <p>2.3 The RIES concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the internationally designated sites in question.</p> <p>2.4 Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured via the Development Consent Order (DCO).</p> <p>2.5 We will remain in contact with Highways England and will seek to conclude a Statement of Common Ground with them before Deadline 8.</p>	
REP7-041.3	<p>3 Comments on the Outline Construction Environmental Management Plan (CEMP)</p> <p>3.1 We have reviewed the Outline CEMP (Rev 3, August 2019).</p> <p>3.2 At Deadline 5, in response to our concerns raised regarding night-time working,</p> <p>Highways England responded (ref. REP3-019.6) saying;</p> <p><i>‘... The Outline Construction Environmental Management Plan (document reference TR010035/APP/7.2 – Rev 2) will further regulate night-time working.’</i></p> <p>3.3 However, nothing additional has been included within this latest version of the Outline CEMP to regulate night-time working.</p> <p>3.4 This matter should be clarified, and the CEMP amended as previously agreed.</p> <p>Bird Mitigation Strategy</p> <p>3.5 We have reviewed a new version of the CEMP Appendix B - Bird Mitigation Strategy (Rev 2, September 2019), supplied to us by Highways England on 11 September 2019 and a subsequent amendment (sent via email on 18 September 2019). We understand this document will be formally submitted at Deadline 7.</p> <p>3.6 Natural England is satisfied that all our previous concerns and suggestions regarding this Strategy have been adequately addressed by Highways England.</p>	<p>The Outline Construction Environmental Management Plan (CEMP) (document reference TR010035/APP/7.2 - Rev 4) is an overarching document which incorporates the Record of Environmental Actions and Commitments (REAC) (document reference TR010035/APP/7.3 – Rev 5) as an appendix and will include a Noise and Vibration Management Plan which will be drafted by the Contractor and submitted to the Secretary of State for discharge (in consultation with Natural England) prior to construction. Together these documents will regulate night-time working.</p> <p>The following requirement has been added to the dDCO to secure the implementation of the bird mitigation strategy, 7(6) <i>The undertaker must implement the Bird Mitigation Strategy prepared under requirement 4(2)(d)(i) at all times during construction of the authorised development.</i> This secures the suspension of shooting rights adjacent to bird mitigation area.</p>

Reference Number	Written Representations	Response to Written Representation
	<p>3.7 We note further progress on securing the shooting rights to enable this mitigation to be successful and that this is reflected in the addition of paragraph 2.4.2 of the Bird Mitigation Strategy (as emailed to Natural England on 018 September 2019).</p> <p>3.8 Paragraph 2.4.2 notes that suspension of shooting has been agreed however it is not clear how this is fully secured.</p> <p>3.9 We await further updates on this matter, before we can be satisfied that all elements of the Bird Mitigation Strategy are fully secured.</p>	
REP7-041.4	<p>4 Comments on the Record of Environmental Actions and Commitments (REAC)</p> <p>4.1 We have reviewed a new version of the REAC (Rev 5, September 2019) supplied to us by Highways England on 11 September 2019 and a subsequent amendment (sent via email on 18 September 2019). We understand this document will be formally submitted at Deadline 7.</p> <p>4.2 Natural England is satisfied that all our previous concerns and suggestions regarding this Strategy have largely been adequately addressed by Highways England.</p> <p>4.3 Natural England have advised Highways England (via email on 20 September 2019) that Environmental Action and Commitment 4AM (regarding Hedgerow management) should in 3 occurrences state 'shall' rather than 'would shall'.</p>	<p>Noted. These changes were made to Revision 5 of the Record of Environmental Actions and Commitments (document reference TR0035/APP/7.3 – Rev 5) submitted at Deadline 7.</p>

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