From: [redacted]
To: A585 Windy Harbour to Skippool
Subject: A585 Windy Harbour to Skippool Improvement Scheme
Date: 01 October 2019 23:36:35
Attachments: Deadline 8 Representation.pdf

Your reference TR010035

Our reference (as an Interested Party) 20021754

Dear Mr Wiltshire
Our Representation in reply to Highways England's response REP7 - 020 is attached below.
The Flood Risk Assessments states that it is not possible to design out the risk of tidal flooding at Skippool and Windy Harbour and instead evacuation is suggested to save lives. The Wyre Flood Plan Version 4 May 2018 is intended to cope with this risk but the Plan has weaknesses. Refer to **REP6. FREE. 028.4 Flood risk Assessment Report.** Paras 9 and 10.
This assessment was confirmed last week when Councillor Ken Minto tried to help several of his constituents at risk of flooding obtain sand bags from Wyre Council. After spending several hours visiting the Departments providing these services none were able to help.
It follows that if Wyre officials were called on to implement the Flood Plan at only 2 hours notice on a wet and windy night; it is unlikely that all the lives at risk at Skippool, Thornton and Fleetwood. would be saved.
Clearly this is an unsatisfactory arrangement and unless a plan is put in place to prevent this disaster the bypass scheme should not be approved.
Yours sincerely

Edward Greenwood

FREE 2007

Submission to the Planning Inspectorate 21 August 2019

Fleetwood Renewable and Energy Enterprise 2007

Comments on Submission from Examination Library Page 24/27 – REP6- 023 Page 2/2 Highways England response REP7 – 020 Page 26/27. HE 7.28 Page 9/13 - 23.1 to 023.6

FREE. Original Representation by Interested Party in black type

HE. Comments by Highways England in red type

FREE. **Responses to Highways England in blue type**

HE. Highways England reference documents in brown type

FREE. 023.1 Please supply the identity and contact details of the parties who supplied the advice to Arcadis in which the Flood Risk Assessment (with particular reference to page 5 of the Flood Risk Assessment)

HE. 023.1 Refer to response to REP5-028.4 in Responses to Representations Received at Deadline 5 (document reference TR010035/APP/7.25)

FREE. 023.1. Refer to Library Page 27 REP7 – 039 > REP3 -11 > **FREE. 063.5**

Free. 023.2 Without any opportunity to assess the basis of the information on which the Flood Risk Assessment is founded we remain of the view that the indicators of future tidal height and of tidal surge has been grossly underestimated. We cannot believe that the Inspector may make an informed decision without being totally satisfied as to the basis of the information on which his decision will be based

HE. 023.2 Refer to response to REP5-028.4 in Responses to Representations Received at Deadline 5 (document reference TR010035/APP/7.25)

FREE. 023.2. Refer to Library Page 27 REP7 – 039 > REP3 -11 > **FREE. 063.5**

The Environment Agency has based their Flood Risk Assessment on historical records to arrive at a figure for rising sea levels at Skippool accurate to 1mm in 100 years during a 1 in 200 year storm.

A more practical approach to arrive at future flood risk is to base it on the last major flood in 1977 with an increased tidal surge during a 1 in 200 year storm and an allowance for rising sea levels.

On 11 November 1977 there was a tidal surge on the east side of the Irish Sea that varied in height from less than 1 to 1.7 metres. In the River Wyre the 1.5m tidal surge resulted in a 6m AOD tide that came within 0.2m of flooding the road at Skippool.

Wyre's Head of Engineering Services agrees that a reasonable estimate for water level during a 1 in 200 year storm would be a metre higher than the 1977 flood level This could be the result of an increase half a metre in Spring Tide and half a metre in tidal surge. Present estimates for rising sea levels in 100 years vary with predictions of 2 metres. Adding half this amount to 5m tide and a 2.2m tidal surge would flood the road at Skippool to a depth of 1.8 mtres.

Given the potential of tidal surges now during high tides the Dutch would consider that the risk today at Skippoolis greater than that predicted in the Flood Risk Assessment for 100 years down the line.

In underestimating the risk Highways England could be putting more lives at risk.

This FRA does not reflect the views of the Chief Executive of the Environment Agency, Sir James Beven who advocates overbuilding to allow for unknown factors.

FREE. 023.3 The Flood Risk Assessment indicates that it is impractical to defend Thornton, Cleveleys and Fleetwood from future flooding but no grounds have been proposed on which that conclusion is based (Flood Risk Assessment at page 47). Without detailed costings of ALL schemes designed to prevent future. Flooding that conclusion is unsustainable. Consideration of such costings should include a comparison with other (completed) Flood Defence Schemes and we have already made reference to the Netherlands Defence Schemes but without any comment or response from the Inspector

FREE. 023.3 Refer to response to REP5-028.5 in Responses to Representations Received at Deadline 5 (document reference TR010035/APP/7.25).

Free. 023.3 Refer to Library Page 27 REP7 – 039 > REP5 -11 > **FREE. 025.8**

FREE. 023.4 We require you to publish future predicted tidal heights for (say) 25, 50, 75 and 100 years hence, together with the basis of the information on which those predictions are based. We would then intend to show the extent to which the area subject to flooding from the River Wyre will flood -and consequently the extent to which the proposed road improvements will be ineffective.

HE. 023.4 Future predicted tidal heights would need to be obtained from the Environment Agency; the Applicant would not be in a position to publish this information. For the FRA, the Applicant is only required to model a 0.5% AEP tidal event (with and without UKCP18 climate change allowance) which has been agreed with the Environment Agency, refer to the Statement of Common Ground with the EA (document reference TR010035/APP/8.3)

Free. 023.4 Reference document TR010035/APP/8.3 shows various estimates for rising sea level all of which will be superseded by recent Government estimates. It follows that the Coastal flood boundary conditions for the UK: update 2018 Technical summary report is also outdated.
Tide heights shown in TR010035/APP/8.3 and TR010035. 5.2 Flood Risk Assessment understates maximum tide heights and the effect of tidal surges. This information and tide heights on which the FRA is based are matters concern particularly as the same tides are predicted to inundate large areas of land and property. Clearly someone living on high ground in say Southport may not be concerned but this is not the case for residents in Cleveleys.

FREE. 023.5 We have already acknowledged that our particular concern is that flooding can and should be prevented on both sides of the River Wyre including the A585 which is the only road off the peninsula

HE. 023.5 Refer to response to REP5-028.5 in Responses to Representations Received at Deadline 5 (document reference TR010035/APP/7.25)

Free. 023.5 Refer to Library Page 27 REP7 – 039 > REP5 -11 > **FREE. 025.8**

FREE. 023.6 Our proposition for a tidal barrier (including the generation of electrical power from the natural movement of the tides) has wide support in the area and beyond and should be installed and become operative at the mouth of the River Wyre at the earliest opportunity.

HE. 023.6 Refer to response to REP5-028.5 in Responses to Representations Received at Deadline 5 (document reference TR010035/APP/7.25).

Free. 023.6 Refer to Library Page 27 REP7 – 039 > REP5 -11 > **FREE. 025.8**