Arnside & Silverdale Area of Outstanding Natural Beauty Partnership
The Old Station Building
Station Road, Arnside
Carnforth
LA5 0HG
01524 761034
info@arnsidesilverdaleaonb.org.uk
www.arnsidesilverdaleaonb.org.uk

19th August 2021

Lancaster City Council
Regeneration and Planning
Development Management Team
PO Box 4
Town Hall
Lancaster, LA1 1QR

Dear Colleague

Re: EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui generis) including public realm, landscaping, car parking and associated infrastructure and engineering works at Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe, Lancashire; Reference 21/00988/EIO

Thank you for your letter of 5th August requesting the AONB Partnership's comments in relation to this EIA Scoping Opinion request. We have no comments on the EIA Scoping Report Addendum.

In response to a recent email from the Principal Landscape Architect who is preparing the Townscape, Seascape and Visual Impact Assessment (TSVIA) we recommended the inclusion of an additional viewpoint in the AONB: the Silverdale Coast, PRoW and Lancashire Coastal Way, from SD470738 south of Heald Brow, along the coast and past Brown's Houses to Jack Scout. We were informed that our previous recommendations on the EIA Scoping request (19/00758/EIO) - the inclusion of additional viewpoints in the AONB: Jack Scout, Arnside Knott and King William's Hill - are already being included in the TSVIA and expect to be consulted on the final Assessment as appropriate.

Yours sincerely

S. M. Hunter

Sue Hunter
AONB Officer

Plant Protection
Cadent
Block 1; Floor 1
Brick Kiln Street
Hinckley
LE10 0NA
E-mail: plantprotection@cadentgas.com
Telephone: +44 (0)800 688588

Jennifer Rehman
Lancaster City Council
PO Box 4
Town Hall
Lancaster
LA1 1QR

National Gas Emergency Number:
0800 111 999*

National Grid Electricity Emergency Number:
0800 40 40 90*
* Available 24 hours, 7 days/week.
Calls may be recorded and monitored.

www.cadentgas.com

Date: 06/08/2021
Our Ref: NW_GW1A_3NWP_030613
Your Ref: 21/00988/EIO (TC)
RE: Formal Planning Application, LA4 4BU Eden Central Promenade Regeneration Site Marine Road Central Morecambe Lancashire

Thank you for your enquiry which was received on 05/08/2021.
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.
For details of Network areas please see the Cadent website (http://cadentgas.com/Digging-safely/Dial-before-you-dig) or the enclosed documentation.

Are My Works Affected?

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.
Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.
If the application is refused for any other reason than the presence of apparatus, we will not take any further action.
Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

Cadent is a trading name for: Cadent Gas Limited
Registered Office: Ashbrook Court, Prologis Park, Central Boulevard, Coventry CV7 8PE
Registered in England and Wales, No 10080864

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- Gas service pipes and related apparatus
- Recently installed apparatus
- Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the National Grid or Cadent website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail (click here) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus
The apparatus that has been identified as being in the vicinity of your proposed works is:

- Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus in the vicinity)

Requirements

BEFORE carrying out any work you must:

- Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at http://www.hse.gov.uk
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

Excavating Safely - Avoiding injury when working near gas pipes:
http://www.nationalgrid.com/NR/rdonlyres/2D2EEA97-B213-459C-9A26-18361C6E0B0D/25249/Digsafe_leaflet3e2finalamends061207.pdf

Standard Guidance

Essential Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982

General Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103

Excavating Safely in the vicinity of gas pipes guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf

Excavating Safely in the vicinity of electricity cables guidance (Credit card):
http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf

Copies of all the Guidance Documents can also be downloaded from the National Grid and Cadent websites.

SD4165NW
Tile not found in current owner index. Other owners' assets may be present in this area.

SD4165NE
Tile not found in current owner index. Other owners' assets may be present in this area.

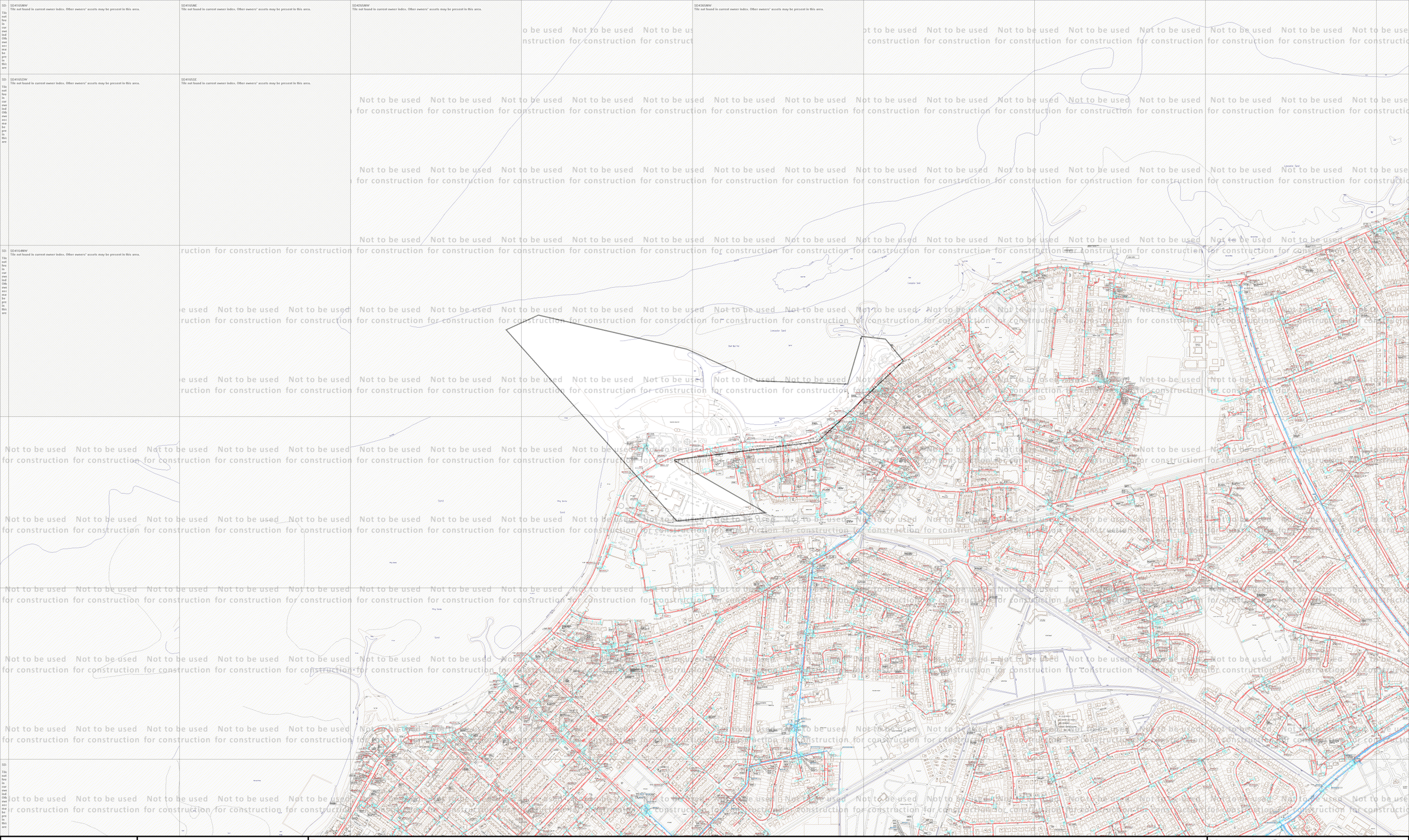
SD4265NW
Tile not found in current owner index. Other owners' assets may be present in this area.

SD4365NW
Tile not found in current owner index. Other owners' assets may be present in this area.

SD4165SW
Tile not found in current owner index. Other owners' assets may be present in this area.

SD4165SE
Tile not found in current owner index. Other owners' assets may be present in this area.

SD4164NW
Tile not found in current owner index. Other owners' assets may be present in this area.


Lancaster Sand
Lancaster Sand
Lancaster Sand
Lancaster Sand
Sand
Sand

ENQUIRY SUMMARY

Received Date
05/08/2021

Your Reference
21/00988/EIO (TC)

Location
Centre Point: 343036, 464496
X Extent: 1166
Y Extent: 604
Postcode: LA4 4BU
Location Description: LA4 4BU Eden Central Promenade Regeneration Site Marine Road Central Morecambe Lancashire

Map Options
Paper Size: A3
Orientation: LANDSCAPE
Requested Scale: 10000
Actual Scale: 1:10000 (GAS)
Real World Extents: 4120m x 2440m (GAS)

Recipients
pprsteam@cadentgas.com

Enquirer Details
Organisation Name: Lancaster City Council
Contact Name: Jennifer Rehman
Email Address: dcconsultation@lancaster.gov.uk
Telephone: 01524 582333
Address: PO Box 4, Town Hall, Lancaster, LA1 1QR

Description of Works
EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui-generies) including public realm, landscaping, car parking and associated infrastructure and engineering works

Enquiry Type
Formal Planning Application

Development Types
Development Type: Development for use by General Public

From: Henriksen, Florence
Sent: 10 August 2021 14:32
To: dcconsultation
Subject: FW: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

From: Power, Ellis <Ellis.Power@lancashire.pnn.police.uk>
Sent: 10 August 2021 14:22
To: Henriksen, Florence <fhenriksen@lancaster.gov.uk>
Subject: RE: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

This email is from an external email address
Do not click any links or open attachments unless you know the content is safe.
Never disclose your password to anyone.

Afternoon Florence,

Thank you for consulting Lancashire Constabulary's designing out crime team on the above project. Due to the nature of this application naturally a development of this size and scale that will form part of the night time economy, has the potential to create additional demand on local policing services with calls for service. As a result of this and to keep people safe and feeling safe the scheme should be developed to achieve Secured by Design (SBD) security standards. Independent academic research shows that Secured by Design certified schemes experience less burglary, criminal damage and vehicle crime.

As per page 7 in the scoping opinion consultation I recommend early engagement with the Designing out crime team and Counter terrorism to reduce the impact of crime at a early stage within the planning consultation I would recommend a meeting for a partnership approach.

Many Thanks,

Ellis

Ellis Power
Designing Out Crime Officer
HQ, Corporate Development
t: 01772 413307
m: 07812512997

From: Henriksen, Florence <fhenriksen@lancaster.gov.uk>
Sent: 05 August 2021 10:56
To: National Trust (NTRUST) (alan.hubbard@nationaltrust.org.uk) <alan.hubbard@nationaltrust.org.uk>;

Architectural Liaison Officers <ALO@lancashire.police.uk>; Natural England (NATENG) (consultations@naturalengland.org.uk) <consultations@naturalengland.org.uk>; Environment Agency (ENVAGN) (clplanning@environment-agency.gov.uk) <clplanning@environment-agency.gov.uk>; County Highways (CE) (lhscustomerservice@lancashire.gov.uk) <lhscustomerservice@lancashire.gov.uk>; Highways England (HIGHWA) (PlanningNW@highwaysengland.co.uk) <PlanningNW@highwaysengland.co.uk>; Hewitson, Andrew <andrew.hewitson@lancashire.gov.uk>; Historic England (HISTEN) (e-nwest@HIstoricEngland.org.uk) <e-nwest@HIstoricEngland.org.uk>; Lead Local Flood Authority (LLFAconsultations@lancashire.gov.uk) <LLFAconsultations@lancashire.gov.uk>; United Utilities Water plc (UUWL) (planning.liaison@uuplc.co.uk) <planning.liaison@uuplc.co.uk>; clerk@morecambe.gov.uk; property <property@lancaster.gov.uk>; Network Rail (NRAIL) (Townplanninglnw@networkrail.co.uk) <Townplanninglnw@networkrail.co.uk>; South Lakeland District Council (SOULAK) (development.management@southlakeland.gov.uk) <development.management@southlakeland.gov.uk>; O'Neill, Matthew <moneill@lancaster.gov.uk>; recycling <recycling@lancaster.gov.uk>; Conservation Team <conservationteam@lancaster.gov.uk>; Environmental Health <environmentalhealth@lancaster.gov.uk>; Gray, Stefanie <sgray@lancaster.gov.uk>; Greater Manchester Ecology Unit (GMEU) (gmeu@tameside.gov.uk) <gmeu@tameside.gov.uk>; Wildlife Trust For Lancashire (kwisdom@lancswt.org.uk) <kwisdom@lancswt.org.uk>; County Archaeology (archaeology@lancashire.gov.uk) <archaeology@lancashire.gov.uk>; Arnside Silverdale AONB Unit (ARNSIL) (sue@arnsidesilverdaleaonb.org.uk) <sue@arnsidesilverdaleaonb.org.uk>; National Grid (plantprotection@cadentgas.com) <plantprotection@cadentgas.com>; Kaloudas, Christos <development.plans@enwl.co.uk>; Engineers <engineers@lancaster.gov.uk>; Fire Safety Officer (FPOL) (lancasterfiresafety@lancsfirerescue.org.uk) <lancasterfiresafety@lancsfirerescue.org.uk>; planningpolicy <planningpolicy@lancaster.gov.uk>; gary@baysearchandrescue.org.uk; Royal Society for the Protection of Birds (RSPB) (NWCasework@rspb.org.uk) <NWCasework@rspb.org.uk>
Subject: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

Lancaster City Council EIA Scoping Opinion Consultation

Please see attached PDF document containing details of a Scoping Opinion you may wish to comment on.

If you have any queries please contact us via email at dm@lancaster.gov.uk.

Kind Regards

Florence Henriksen | Senior Planning and Building Technician | Planning and Place Service | Lancaster City Council

Tel: (01524) 582348 | *Email:* fhenriksen@lancaster.gov.uk
Postal Address: PO Box 4 | Town Hall | Dalton Square | Lancaster | LA1 1QR
Office Address: Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF

Please note that due to a number of vacant posts in the planning application team that have proved difficult to fill during the Covid-19 related lockdown, the council currently has a large backlog of valid planning related applications and pre-application enquiries. Understandably this is resulting in a significant volume of correspondence from concerned applicants and agents. In dealing with such correspondence it diverts our resources away from processing the applications. We would therefore respectfully ask for your patience as the council seeks to do all it can to bring in resources to tackle this backlog. In the interim please note that delays of many weeks will be incurred in processing and determining the applications and pre-application enquiries. We apologise for any inconvenience caused.

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An Investor in People/Positive about Disabled People.

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Lancaster City Council
Regeneration and Planning Service
PO Box 4
Lancaster
Lancashire
LA1 1QR

Our ref: NO/2021/113772/01-L01
Your ref: 21/00988/EIO

Date: 18 August 2021

Dear Sir/Madam

ADDENDUM TO THE EDEN PROJECT NORTH ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT JUNE 2019
LAND NORTH-WEST OF MORECAMBE RAILWAY ST MARINE ROAD CENTRAL MORECAMBE LANCASHIRE

Thank you for consulting us on the above document, which we received 5 August 2021.

Environment Agency position
We have no additional comment to make regarding the Addendum as submitted, further to our response to the initial Scoping request (our ref NO/2019/111849).

In so far as it relates to our remit, we concur with the conclusions of Lancaster City Council as set out in their Scoping Opinion August 2019, (included here as Appendix B), in particular para 6.3 regarding Biodiversity and Net Gain, and para 6.5 regarding Hydrology and Flood Risk.

Yours faithfully

Mrs Liz Locke
Sustainable Places Officer

e-mail clplanning@environment-agency.gov.uk

21/00988/EIO

Jennifer

Further to your consultation on the above, I note that the submitted document is an update on a Scoping Report from 2019. Little has changed within the Nature Conservation and Biodiversity chapter except the inclusion (1.4.14) of increased recreational pressure from Eden visitors onto the wider area and the associated recreational impacts on ecological designated sites. I concur with this view, and have attended discussions on this matter with the Council and Natural England (15 June 2021).

I have the following broad comments to make on the Chapter 11, which I acknowledge has not changed since 2019 and these comments should be seen as additional to those that may have already been provided by GMEU earlier in the preapplication process. Comments are as follows: -

- I note from Chapter 11 (Nature Conservation and Biodiversity) that some elements of the proposal are yet to be formulated (11.5). Some of these elements could potentially include changes to the foreshore, boulders and/or marine defences. While the implication is that these might be considered 'ancillary' developments, GMEU would strongly advise that all elements of the works associated with Eden of the North are included within the ES. This should include any enabling works, ancillary and/or associated proposals.
- It is noted that the scheme will also be accompanied by a shadow Habitats Regulations Assessment which will sit beside the ES. It is a matter for Natural England to advise on how they wish to see the two legislative processes integrate. However, GMEU would recommend that any proposed mitigation under the sHRA should be linked back and integrated within the ES process. This is particularly important where mitigation might be proposed to reach a conclusion of no adverse effect on integrity may have consequences for other elements of the ES assessment. In this regard for example it may include pollution management during construction/operation, landscape & visual ES topics and or traffic & highways (eg circulation and parking). This is alluded to within section 9.52 but I would recommend that the final ES includes a clear table of associated inter-relationships so this narrative can be followed and adequately assessed by consultees.
- The Scoping Document indicates adherence to the emerging Environment Bill and Biodiversity Net Gain (BNG). The new Defra metric (metric 3) was published in the last 2 months and it is recommended that this metric is used within the BNG calculation.
- Any off-site locations which might be proposed to achieve BNG should also be surveyed and assessed within the ES submission.
- It is not clear from the Scoping if surveys are to be extended to include intertidal and marine habitats. This should be clarified and whether it is considered necessary by Natural England.
- It is clear that no additional survey of wintering birds is to be provided as there is considered to be sufficient data already available. This includes the work of Lilly et al 2015 and Urban Splash 2008, along with WeBS counts. This topic area was in part revisited at the recent meeting. It should be confirmed with Natural England that their comments of 2019 (section 11.43) still stand and whether the approach is acceptable.
- The data resource includes WeBS counts in the last 10 years from 3 locations (Stone Jetty, Lancaster Sand and Shell Bed Flat), which cover a significant area. Analysis should be presented to a locational point where it is provided within the source material. Additionally, I am uncertain as to the relevance of data that was collected in the ABP surveys of 1990s and 2000s, as this is now be over 20 years old. It is not clear if the data capture covers Ring Sands.
- I would strongly suggest that any data analysis of the wintering bird assemblage is presented in map format, along with plan showing the extent of the survey zones of the WeBS sectors, as this makes interpretation of tabular data more effective.

I hope you find these comments helpful. I have copied in Elizabeth Knowles at Natural England as a matter of professional courtesy and have included Derek Richardson for information.

If you have any queries please get in touch.

Teresa

Teresa Hughes
Senior Ecologist
Planning
Planning and Transport

Warren Hilton
Assistant Spatial Planner
8th Floor
Piccadilly Gate
Store Street
Manchester M1 2WD

Directorate for Economic Growth and Regeneration
Lancaster City Council
PO Box 4
Town Hall
Lancaster
LA1 1QR

9 August 2021

Dear Sir / Madam,

21/00988/EIO - EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui-generis) including public realm, landscaping, car parking and associated infrastructure and engineering works

Eden Central Promenade Regeneration Site Marine Road Central Morecambe

Thank you for inviting Highways England to comment on the scope of the Environmental Impact Assessment (EIA) associated with a proposal for the construction of a major mixed leisure development in association with Eden Project on land north of Marine Drive Central, Morecambe.

Highways England has been appointed by the Secretary of State for Transport, and is charged with operating, managing capacity, maintaining and improving England's motorways and major A roads, which form the strategic road network (SRN). It is our ambition to ensure that major roads are more dependable, durable, and most importantly – safe.

The SRN in Lancaster comprises specifically of Junctions 33, 34 and 35 of the M6 motorway; a route of national significance that links the Midlands, North West England and Scotland.

We note that prior to the submission of a planning application, Eden Project International Limited ('The Eden Project') will undertake an EIA, including Transport Assessment (TA) through their consultants, WSP. We further note that proposed development would attract a maximum one million visitors per annum, with an estimated annual average visitor number of 760,000. Although the site is remote from the SRN itself, this level of patronage may have implications for the SRN. Notwithstanding the updates to the development parameters since the original 2019 EIA Scoping Report, we therefore comment on the topics within the July 2021 EIA Scoping report we feel are relevant, below.

Local Plan Status and Lancaster Highways and Transport Masterplan

The statutory Development Plan for Lancaster currently includes the Lancaster Local Plan 2020 - 2031 (adopted 2020 and currently subject to a review), the Morecambe Area Action Plan (AAP) DPD (adopted December 2014), and the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) DPD (adopted March 2019).

disability confident COMMITTED

We note that the Core Strategy and Morecambe AAP identify central Morecambe as a regeneration priority; the site in question being identified for leisure investment and development and also open public space for peoples' informal recreation (the latter use taking precedence in any conflict between the two uses for this site).

Highways England has previously raised several concerns during the development of the Local Plan in relation to the lack of robust and coordinated transport evidence supporting the adopted Lancaster Highways and Transport Masterplan, in developing the emerging Lancaster Local Plan, the recent South Lancaster Growth Catalyst Housing Infrastructure Fund (HIF) submission and the City Centre Movement Strategy. In this context, the concerns we have over the Highways & Transport Masterplan have particular relevance given its own aim to remove vehicle traffic from Morecambe promenade.

Transport Vision

Of interest to us are ten principles that form the transport vision for the proposals set out within the EIA scoping document, and which follow a similar theme to promote the use of none-car travel modes and to encourage the development of Morecambe as a whole. These are:

1. *Eden Project North aims to work with the existing transport infrastructure – including the use of the M6 junction 34 park and ride facility;*
2. *Eden Project North aims to support future transport developments where multiple schemes can create an argument for larger-scale improvements;*
3. *Eden Project North aims to positively influence circulation routes in and around the town of Morecambe, encouraging pedestrianisation and inspiring people to spend more time in different areas;*
4. *Public transport is the priority method;*
5. *The baseline for the planning horizon is 2025+, with a vision towards 2030;*
6. *Last two miles – no fossil fuel vehicles around the site;*
7. *Pedestrianisation of the Prom;*
8. *The journey should be joyful;*
9. *Visitors that make a special effort to travel to the destination sustainably will be rewarded by reduced entry prices and other incentives; and,*
10. *Eden Project North's transport vision extends as far as the perimeter of the project site but aims to be flexible enough to allow for collaboration in parallel with neighbouring infrastructure.*

This transport vision clearly aims to position the Eden Project North as a leading example for progressive and healthy transport methods in the UK. **Highways England supports in principle this general approach to development**.

The first principle to use existing transport infrastructure includes the proposed use of the Lancashire County Council (LCC) operated Park and Ride site located at M6 Junction 34. This, in effect, will move the signed vehicular visitor access to the Eden Project North to the Park and Ride site at Junction 34 of the M6, which is likely to concentrate visitor traffic impacts next to the SRN at a single location remote from the attraction.

EIA Scoping

In general, we consider that the approach that has been taken to the EIA scoping is broadly compliant with applicable national policies, guidance and best practice.

disability confident COMMITTED

The assessment will be undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) 'Guidelines for the Environmental Assessment of Road Traffic' (1993). Whilst somewhat dated, it is accepted that these guidelines remain useful reference material for the assessment of transport impacts.

The transport chapter sets out the baseline conditions, which notes that the 650-space current Park and Ride at the junction of Caton Road with the M6 junction 34 slip-road operates under capacity and that there is potential to expand with it with a further circa 600 spaces if necessary using land owned by LCC, which could be achieve through surface parking without the need for a decked car park. **Clarification is needed as to how this expansion could be provided safely at the facility, and without adverse traffic or physical impact upon the SRN (which surrounds the Park and Ride side on two sides)**. This is discussed further on in this letter.

We note that LCC have informed the applicant that the Morecambe traffic model has recently been updated and can be used to assess traffic impact across the town. **We suggest that if the traffic flows in the model relate to data collected before the opening of the Bay Gateway, new traffic flow data is collected in a neutral month to inform the traffic model assessment**.

WSP state that the transport impacts of the development will be appraised in a full TA, which is welcomed.

The EIA scope notes the following traffic related environmental effects that IEMA guidelines suggest are considered:

- Severance;
- Driver Delay;
- Pedestrian Delay;
- Pedestrian Amenity;
- Fear and Intimidation;
- Accidents and Safety; and
- Hazardous Loads.

WSP propose to reflect the findings of the TA within the EIA transport chapter, whilst assigning levels of significance to the perceived effects. They will also set out the requisite mitigation measures and the residual effects once these are incorporated into the proposals. **We support this approach as it aligns with the IEMA guidelines, and in reflecting the findings of the TA it will ensure a satisfactory conclusion**.

The assessment will include consideration of the cumulative effects during the construction and operational phases of the proposed development taking into account the potential cumulative effects with existing or approved developments within the local area. The proposed development will be subject to a Construction Traffic Management Plan (CTMP), which will identify a range of mitigation measures to be adhered to at the construction stage to minimise the impacts on surrounding sensitive receptors, such as residential areas and schools and it will include specific routing of construction traffic to the site. **It is essential that the EIA identifies all construction routes likely to be employed during the construction phase and provides forecasts of the volume of traffic likely to be generated and that a CTMP is prepared in accordance with the findings of this assessment**.

disability confident COMMITTED

Transport Assessment
We note that an initial meeting with LCC highways officers has informed the EIA scoping report and that they were supportive of the general principles of the transport vision for the Eden Project North, noting that they were in accordance with their own transport and highways aspirations (as indicated by the note of the meeting is provided in Appendix 14.2 of the EIA scoping report).

Highways England supports the reference to being consulted on the scoping study, and for the TA to formally agree the content of the assessment. **We suggest that the scope to be agreed for the TA accompanying the proposed development includes**:

- The spatial coverage of the TA. Agreeing details of the road network and junctions where the impact of the development will be assessed;
- The temporal coverage of the TA. Agreeing the days of the week and time periods to be assessed. The opening year for the site will also be agreed along with any future year assessment that might be required;
- Baseline data to be used to inform the TA, including traffic flow and collision data;
- Trip generation and distribution assumptions to be adopted in the TA; and
- Modelling tools necessary to assess the impact of the development.

We also note and welcome the reference that multi-modal trip rates will be agreed with us and based upon the potential visitor numbers to the site and likely mode share. We suggest that this includes sensitivity tests to show the transport impact if the site is accessed 100% by private cars and by a more conservative estimate of modal share, as well as any agreed modal share split. **In addition, we note that staff parking may be permitted on site and as such this should be reflected within any assessment**.

We note that the TA will consider the impact of Heavy Goods Vehicle (HGV) movements during the construction process, both in terms of quantum and the potential routing. We also note that the assessment will include an evaluation of the traffic generated by all pertinent consented or committed developments in the vicinity of the site. **This approach is considered acceptable in principle subject to confirmation of the developments to be included, which we note will be agreed with Highways England as part of the TA scoping process**.

We welcome the reference that the junctions required to be assessed within the TA will be agreed with Highways England during the pre-application process. In support of any planning application for this site, a full junction modelling assessment and TD22/06 analysis for the slip roads at Junction 34 should be undertaken to determine that the development does not have an adverse impact upon the safety and operation of the SRN. This is needed to demonstrate that the forecast demand associated with the development can be accommodated on the highway network and that any appropriate mitigation measures are identified and implemented as required. It should be noted that the Transport Assessment for the Local Plan identifies Junction 34 as requiring mitigation measures.

Highways England would expect the TA document to cover the following chapters:

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- Background and Context – setting the scene within which the TA has been developed;

- Existing Conditions – describing the site within the context of the local and wider highway network (e.g. SRN), including details on local road safety conditions;

- Planning Policy Context – set out the local, regional and national planning policy context as it relates to transport and access for the site;

- Sustainable Access Appraisal – describing the accessibility of the site to sustainable public transport networks, pedestrian connectivity and cycle connectivity;

- Development Proposal – describe the development proposal, its layout and access by all modes;

- Trip Generation, Distribution and Assignment – detailing the trip generation estimates produced, and how they have been distributed and assigned to the agreed impact area;

- Baseline and Forecast Year Traffic Flows, With and Without Development – based on the agreed assessment years and the estimated trip generation from the site opening year, how future flows in the impact area have been identified for the baseline situation and the with development situation. These traffic flows will form the basis of the highway impact assessment;

- Highway Impact Assessment – an analysis of the impact of the proposed development traffic on the agreed impact area and if appropriate include suitable mitigation measures developed to counter any adverse impacts. The impact assessment should also examine the performance of the site parking access and use of the M6 Junction 34 Park and Ride facility by visitor traffic (including how visitor traffic would be managed safely at Junction 34 in-keeping with the operation of the Park & Ride facility); and

- Summary and Conclusions –summarising the key findings and the conclusions.

WSP engaged with Highways England earlier in 2021 regarding the assumptions proposed to be made within the TA. Whilst this consultation relates specifically to the EIA Scoping Report as opposed to any draft TA to accompany the application, a summary of the relevant findings from these discussions that Lancaster City Council may find useful to be aware of is provided following our comments on the Appendix D Parking Strategy, below.

Highways England Comments on Appendix D – Parking Strategy

A dynamic parking solution has been agreed with the Local Authority whereby some underutilised parking with Morecambe town centre would be used, along with the park and rise site at Junction 34 of the M6. It is envisaged that of the 162 parking spaces given in the OBC, 50% would be within the town centre and 50% would be at the park and ride site.

We have looked at the information in Tables 1 and 2 relating for Eden Visitors per Day expected parking requirements by season and Proposed Parking Provision for Eden Visitors and Staff respectively.

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The above assumptions would seem to be reasonable in principle although the *existing* demand at these sites will need to be verified, particularly during the peak periods, to ensure that the additional demand can be accommodated.

It is stated that the Eden North project will operate a time-ticketing system to ensure that the capacity is not exceeded, with visitors being directed to a specific car park. This is accepted in principle, although the detail will need to be agreed to avoid a situation whereby visitors potentially arrive early, and have to wait, as well as the control to ensure the space is either reserved (if so how is this managed) or is still available at the required time.

Indeed, what would happen if visitors arriving to park missed their time slot (e.g. due to travel delay) and so needed to utilize the car parking space for later and longer than anticipated. Furthermore, should visitors to the EPN park at Junction 34 for their visit (say, fixed for the morning), but then decide to spend all day in Morecambe, this may jeopardise parking availability for other at peak times and may in turn affect the functioning the Park & Ride as a whole.

The Park and Ride bus will use the existing facility at the M6 junction and drop off within Morecambe centre, which is considered reasonable, although again the control and availability of parking spaces will need to be reviewed and agreed.

It is stated that accessible parking will be provided within the existing car parks identified above and can be investigated at a future date. However, it should be identified at this stage whether there are sufficient levels of suitable parking for the scheme and that there are also suitable linkages from the car parks to the Eden Project North for less mobile visitors, who may not wish to walk longer distances to access the development.

Further details in terms of capacity (both at the park and ride and within Morecambe), impact upon the SRN and how this will be controlled is required before it can be accepted. Rather than be quoted in an aspirational context, the specifics of how this will work in practice (particularly in terms of managing all traffic at the Junction 34 park and ride site) needs be demonstrated. Highways England remains concerned as to how the Junction 34 park and ride may operate in future if measures are taken to reduce parking capacity within Morecambe itself coupled with a rise Morecambe visitor demand associated with any wider revival of the resort that Eden Project North could be a catalyst for.

Therefore, further explanation and detail as to how this will operate is required. This is important, as there appears to be no actual evidence of any agreement with LCC / Lancaster City Council as to exactly how parking will be managed effectively. Given that the use of the Park and Ride at M6 Junction 34 is seen as central to the overall transport strategy (where otherwise, it would not need to be), it is not unreasonable to expect that evidence of the agreement with Lancashire County Council and precise details of how Eden Project North visitor parking would be managed are available as part of the planning application in order to demonstrate that they would work in practice.

Therefore, whilst the Parking Strategy may be fine principle, the following will need to be considered by Eden Project / WSP before it can be accepted:

- The demand will need to be demonstrated and evidenced through the Transport Assessment;

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- The existing demand at the car parks will need to be demonstrated to ensure that there is sufficient capacity for the additional Eden North visitors;
- Once a time ticket has been issued to a particular visitor, how is that space reserved, and how will this system will operate;
- Is there a limit on the length of stay associated with the time ticketing system, as there could then be more demand for parking than is forecast, if you have to accommodate not only people visiting the project but also those who have stayed longer and are now either still within the site or are visiting other facilities in Morecambe;
- The demand for and existing capacity of accessible parking should be investigated at this stage.
- Seeking the agreement of the parking area owners and local highway authority as to how this will operate.

Highways England General Observation – Transport Assessment

We understand that the Lancaster SATURN model (originally built by Lancashire County Council and now being updated to assist in the development of the M6 Junction 33 relocation project associated with the County Council's South Lancaster Growth Catalyst Housing Infrastructure Fund [HIF]bid) may be used to inform the TA and that, from this, work the vehicular trips generated by the development at M6 Junction 34 are not significant compared to baseline and future traffic flows (the impacts being outside of the normal highway network peaks). Therefore, we understand that it is not proposed to undertake any junction capacity analysis beyond a merge / diverge assessment at Junction 34 of the M6.

However, if this approach is pursued within the TA, further information is required before we can agree that no operational assessment of Junction 34 of the M6 is required.

Furthermore, it should be noted that Highways England has not yet been consulted on / approved the updated Lancaster SATURN model / modelling of the HIF schemes and Local Plan growth, which is a funding caveat of the South Lancaster Growth Catalyst HIF funding award in principle.

We feel as this is being used to underpin the wider TA and assumptions, that both Lancaster City Council and WSP should be aware of this.

Other Matters and Highways England Concluding Comments

Of interest to us is the vision that the proposed development will support sustainable transport by being designed with the aim of visitors (and potentially local staff) accessing the attraction by public transport (rail and bus / coach), walking and cycling, rather than by private car. The vision is that there will be no fossil fuel vehicles used to access the site for the last two miles of the journey.

This idea fits in with the Lancaster Highways and Transport Masterplan vision for the pedestrianisation of Morecambe promenade following the opening of the Bay Gateway, together with the (emerging) Lancaster City Centre Movement Strategy and associated South Lancaster Growth Catalyst HIF bid for public transport (Bus Rapid Transit) and walking and cycling initiatives. However, this is founded on a transport strategy for private car trips to the attraction to use the Park and Ride facility at the junction of Caton Road with the M6 Junction 34 slip road; there being a reference to the potential for increasing the surface car park by almost 100% using land owned by Lancashire County Council.

Against this background, our concern in relation to the transport strategy (and the potential to almost double the capacity of the Park and Ride facility) is how this may impact on Junction 34 of the M6. **Specifically, given the emerging Local Plan proposals and the potential for traffic from south Lancaster to use the M6 and Junction 34 to access the city centre and that the junction of the Park and Ride could evolve into a single remote parking facility for *all* visitors to Morecambe (i.e. all vehicle traffic is retained at the SRN)**. **In future, should the tourism and leisure offer of the wider Morecambe and Heysham area broaden because of this development and other local policy initiatives, higher visitor numbers to the area may mean that this transport strategy is not sustainable in itself**.

Following our consideration of the WSP | Indigo EIA Scoping Report, which has focussed on the Traffic, Transport and Access Chapter, we are of the view that it is broadly compliant with applicable guidance and best practice. In principle, we agree that the assessment is appropriate, although this is subject to the TA scope, multi-modal trip rates, the junctions to be assessed and the consented and committed developments to be included being agreed with Highways England as mentioned in the scoping report. We would also request that the EIA identifies all construction routes likely to be employed during the construction phase and provides forecasts of the volume of traffic likely to be generated.

An appropriate transport assessment of the proposed development is key to assessing the quality and capacity of the existing transport infrastructure and its ability to meet forecast demand, leading to the identification of mitigation measures for all modes. We specifically request that the assessment considers the potential impact on the SRN, given that traffic will be signed to the Park and Ride at the junction of Caton Road with the M6 Junction 34 slip road and that it is likely to generate over 30 two-way trips. This is required to assist Highways England in forming a full understanding of the implications of forecast demand and trip rates associated with the proposed development, particularly in terms of volumes of visitor traffic being concentrated on Junction 34 of the M6 and the Park & Ride facility.

At this point, it is worth stating that detailed consideration will need to be given to the traffic management strategy as regards to the SRN. This would have to comply with the requirements of the Design Manual for Roads and Bridges standard CG152 *'Traffic Signs to Tourist and Leisure Facilities in England'*. The applicant should be aware that they would need to fund the cost of making alterations / additions to motorway signing and that those costs are likely to be to be not inconsiderable.

We hope that you find our comments useful. If you would like to discuss anything about this letter, please feel free to contact me.

Yours faithfully,

Warren Hilton

Warren Hilton
North West Asset Development Team
Email: warren.hilton@highwaysengland.co.uk

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Historic England

Ms Jennifer Rehman
Lancaster City Council
PO BOX 4
Town Hall
Lancaster
Lancashire
LA1 1QR

Direct Dial: 0161 2421442

Our ref: PL00753962

16 August 2021

Dear Ms Rehman

Re: Eden Central Promenade Regeneration Site Marine Road Central, Morecambe Environmental Impact Assessment (EIA) Scoping Report

Thank you for your letter of 5th August 2021 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The Scoping Report has set out the proposed scope of the assets to be assessed in section 10, as well as a proposed methodology. This section also includes a commitment to undertake consultation with ourselves and the local planning authority. The scope of the assets to be assessed is considered to be appropriate, as is the methodology proposed for the assessment.

We note positively that the Environmental Statement will also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of Lancaster City Council and the archaeological staff at the Lancashire HER in the development of this assessment. They are best placed to advise on: local historic environment issues

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). A ny Information held by the organisation can be requested for release under this legislation.

and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Richard Broadhead
Inspector of Historic Buildings and Areas
Richard.Broadhead@HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). A ny Information held by the organisation can be requested for release under this legislation.

OFFICIAL

Lancaster City Council
Planning Department
Town Hall
Dalton
Lancaster

Please ask for: Chris Stainton
Telephone: 0152432311/07920574618
Email: ChristopherStainton@lancsfirerescue.org.
Your Ref:
Our Ref:
Date: 12 August 2021

Dear Sirs

PROPOSED PLANNING APPLICATION CONSULTATION

Application No:	21/00988/EIO
Proposal:	EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui-generies) including public realm,
Site Address:	Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe, Lancashire

The proposed Planning Application has been noted and the Fire Authority gives its advice in respect of access for fire appliances and water supplies for firefighting purposes to the site.
The following recommendations are made to make the applicant aware of conditions which will have to be satisfied on a subsequent Building Regulation application. The conditions may affect the elevation of the building and access to them. These recommendations must be included if this application passes to another party prior to

ACCESS - DOCUMENT B, PART B5

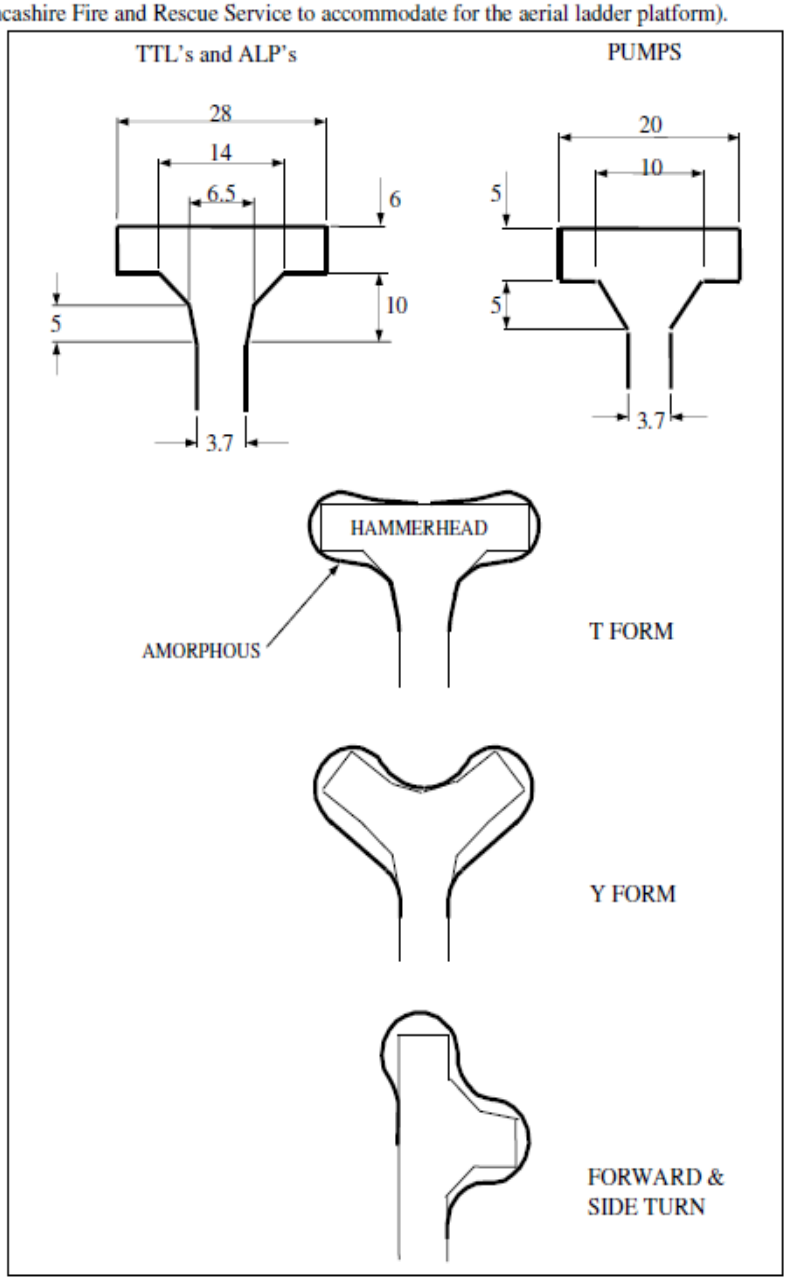
It should be ensured that the scheme fully meets all the requirements of Building Regulations Approved Document B, Part B5 ‘Access and facilities for the Fire Service’.

LANCASHIRE FIRE AND RESCUE SERVICE
SAFETY SERVICES DEPARTMENT

NOTE FOR GUIDANCE N° 14

TURNING FACILITIES FOR FIRE SERVICE VEHICLES

The following diagrams show typical turning heads in accordance with table 21, note 1 and paragraph 17.11 of Building Regulations approved document B, part B5 (as amended by Lancashire Fire and Rescue Service to accommodate for the aerial ladder platform).



EXTRACT FROM BUILDING REGULATIONS APPROVED DOCUMENT B
(as amended by Lancashire Fire and Rescue Service to accommodate for the aerial ladder platform)

Table 21 - **Typical vehicle access route specification**

Appliance Type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.7	16.8	19.2	3.7	12.5
High Reach	3.7	3.7	29.0	29.0	4.0	26

Notes:

1. Fire appliances are not standardised. Some fire services have appliances of greater weight or different size. In consultation with the Fire Authority, Building Control Authorities and Approved Inspectors may adopt other dimensions in such circumstances.
2. Because the weight of high reach appliances is distributed over a number of axles, it is considered that their infrequent use of a carriageway or route designed to 12.5 tonnes should not cause damage. It would therefore be reasonable to design the roadbase to 12.5 tonnes, although structures such as bridges should have the full **26 tonnes** capacity.

B5 WATER PROVISION

It should be ensured that the proposal is provided with suitable provision of Fire Fighting water. Any provisions should comply with National Guidance, details of which can be found: http://www.water.org.uk/publications/water-industry-guidance/%E2%80%A8national-guidance-document-provision-water-fire-fighting-3rd

Guidelines on flow requirements for firefighting (taken from the National Guidance document on the provision of water for firefighting):

Type of building	Minimum main size (mm)	Minimum flow (litres per min)	Ideal flow (litres per min)	Maximum distances between hydrants (m)
Semi-detached house	90	480	1200	150
Detached house	90	480	1200	150
Multi occupied house	100	1200	2100	150
Transportation	100	1500	2100	90
Industry – Up to 2.5 Acres	150	2100	4500	70
Industry - 2.5 Acres to 5 Acres	150	3000	4500	70
Industry – Over 5 Acres	150	4500	4500	70
Shops/Offices/Recreation/Tourism	150	1200	4500	70
Village Halls	100	900	1200	100
Primary Schools	100	1200	2100	100
Secondary School/College	150	2100	4500	70
Hospitals	150	2100	4500	70

The Local Authority Building Control / Approved Inspector and Fire Service should be consulted at the earliest opportunity where more specific advice can be offered.

If you would like to discuss this or any other matter of fire safety, please call me on 0152432311/07920574618

Yours sincerely

Chris Stainton

Business Safety Advisor
for Chief Fire Officer

Lancaster Fire Station
Cable Street
Lancaster
LA1 1HH

Lancashire County Council

Mark Cassidy
Lancaster City Council
PO Box 4, Town Hall
Dalton Square
LANCASTER
LA1 1QR

Phone: 01772 531343

Email: Archaeology@lancashire.gov.uk

Your ref: 1/2021/00988/EIO

Our ref: 1_2021_00988_EIO-LCC

Date: 26th August 2021

Dear Mr Cassidy,

Planning Application 1/2021/00988/EIO: EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui-generies) including public realm, landscaping, car parking and associated infrastructure and engineering works.
Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

Thank you for your consultation on the above application, including an update to the Scoping Report. We note the changes to the 2019 ES Scoping Report Chapter 10 (Cultural Heritage) set out in sections 1.4.7 to 1.4.13 and would agree that they are appropriate. We would also confirm that, as commented previously (letter dated 9th July 2019), that the archaeological potential of the site is limited and the significance of impacts on buried remains are almost certain to be negligible. We would still accept that archaeology should be scoped out but built heritage scoped in.

Yours sincerely

Peter Iles

Planning Officer (Archaeology)
Historic Environment Team

Lancashire County Council

DM Technical Team
Lancaster City Council
PO Box 4
Town Hall
Lancaster
LA1 1QR

Tel 0300 123 6780
Email developeras@lancashire.gov.uk

Your ref 21/00988/EIO
Our ref 21/00988/EIO/DRW1
Date 25th August 2021

(FAO Jennifer Rehman)

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION

Application Number: 21/00988/EIO

Location: **EDEN, CENTRAL PROMENADE REGENERATION SITE, MARINE ROAD CENTRAL, MORECAMBE, LANCASHIRE**

Proposal: **EIA SCOPING OPINION REQUEST FOR THE DEMOLITION OF EXISTING BUILDINGS/STRUCTURES AND PROPOSED CONSTRUCTION OF MAJOR MIXED USE LEISURE DEVELOPMENT IN ASSOCIATION WITH EDEN PROJECT (INCLUDING USE CLASSES E, F1, F2 AND SUI-GENERIES) INCLUDING PUBLIC REALM, LANDSCAPING, CAR PARKING AND ASSOCIATED INFRASTRUCTURE AND ENGINEERING WORKS**

Dear Sir / Madam,

Thank you for your letter requesting scoping opinion observations for the above proposal in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

This scoping opinion response considers only highways and transportation matters identified as potentially significant issues that should be considered in determining the subject matter of the EIA and any subsequent planning application.

The request for a formal scoping opinion is supplemented with an EIA Scoping Report Addendum. This report highlights that a full Transport Assessment (TA) and Travel Plan, that covers the impact of both construction and operational traffic will be produced to support a forthcoming application for development.

Phil Durnell
Director, Highways and Transport,
Lancashire County Council
Cuerden Mill • Cuerden Way • Bamber Bridge • Preston • PR5 6BS

Background

The main development site is bound to the north, east and west by the promenade which extends east-west along the Bay of Morecambe. The main development site is identified by Lancaster City Council as a Development Opportunity Area.

The site boundary also incorporates the promenade immediately north and east of the site, the sea wall and part of the bay to the north, the stone jetty to the north west and aspects of Morecambe Town Centre and the public realm to the south. There are access needs to the stone jetty, slipways and lifeboat station, that will need to be maintained and not prejudiced buy this proposal. These are beyond the highway boundary, this also includes the needs of pedestrians and cyclists. The site falls within the Morecambe Conservation Area and close to a number of designated heritage assets.

As local highway authority (LHA) Lancashire County Council welcomes and encourages discussions before a developer submits a planning application. These discussions result in better quality applications which stand a stronger chance of a successful outcome and help speed up the decision-making process after submission. Lancashire County Council (LCC) operates a service providing pre-application highway advice for development proposals and project work. In order to provide this service the County Council only recovers those costs associated with the discussions.

The pre-application process between the LHA, the applicant and the applicant's transport consultant has been ongoing for some time. Regular meetings and correspondence will continue.

Transport Assessment and Travel Plan

Discussion on the current proposals between the applicant and the LHA have allowed the identification of key parameters required for the necessary Transport Assessment (TA). There are a number of issues in particular that will need to be clearly assessed to the satisfaction of the LHA and addressed within the Transport Assessment. The supporting information required for the proposed development site must include:

- A suitable access strategy, including examination of all opportunities to the wider network and other corridors;
- A Parking Strategy, has been discussed, further work required to demonstrate the proposals can be secured and are satisfactory to the highway authority for all demand periods; key parameters are yet to be agreed;
- A comprehensive Transport Assessment in line with guidelines/best practice to assess the impact on the local transport network; The TA should establish up to date base and future year transport conditions (negating Covid-19 conditions);
- A full cumulative assessment of impact will be required in order to fully assess the impact on the transport network;
- Validation of the traffic data and traffic modelling work (with consideration for existing operation/congestion/delay/queue lengths);
- Highway network operational assessments (links and junctions utilising proprietary software for individual junctions or linked)
  (*Note: the LHA will not accept the premiss that existing network capacity is established based on current availability of parking provision*)
- An Interim Travel Plan;
- Details of all measures and mitigation necessary to establish sustainable development in line with the latest local and national planning policy (NPPF); high quality provision from this development to the existing local network for pedestrians and cyclists will be important.

- Impact on Public Rights of Way (PROW) / Cycle routes - there are a number of PROW / Cycle routes that run through or adjacent to the proposed site. I would expect to see full assessment of any proposals that impact existing infrastructure and associated mitigation measures;
- Provision for pedestrians and cyclists, connecting the proposal to the wider network on suitable desire lines;
- Demonstrating the site will be supported by a good public transport service, linked by direct footpaths and in operation is safe without unnecessary conflict (i.e. for visitors utilising dedicated public transport services should not be required to cross a principle highway to access the site,
- Demonstrating that required bus and rail services are at a frequency to support the needs of the site and with links to a number of key suitable destinations;
- Demonstration of an acceptable level of access to public transport, i.e. that there will be capacity within the services at the required times for the duration of the development.

Overall, with regard to the above, I consider that this site proposals warrant further highways pre-application discussions between the applicant and the LHA.

Sustainable Urban Drainage Systems (SuDs)

LCC are now the Lead Local Flood Authority (LLFA), as such I would refer to the LCC Flood Risk Assessment Teams comments which, as a statutory consultee, I would expect to be provided under a separate response. Clearly, the development of the site should consider the requirements likely to be asked for in support of a SuDs drainage scheme. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance.

In Summary

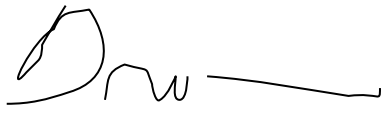
This scoping opinion response considers the highways and transportation matters identified as potentially significant issues that should be considered in determining the subject matter of the EIA and any subsequent planning application.

The Transport Assessment to be developed will establish the full impacts of the overall proposals and therefore the measures and mitigation necessary to deliver sustainable development in line with the latest local and national planning policy (NPPF). The TA must include:

- A suitable access strategy, including examination of all opportunities;
- A Parking Strategy that satisfies needs at all times;
- Highway network operational assessments and baseline validation;
- Provision for pedestrians & cyclists, connecting the site to the wider community;
- An acceptable level of access to public transport; and
- Delivery of all necessary mitigation, in line with analysis.

I hope the above is of assistance.

Yours Faithfully,



David Watson
Strategic Development, Highways Development Control,
Community Services, Lancashire County Council

Date: 25 August 2021
Our ref: 363454
Your ref: 21/00988/EIO

Lancaster City Council

dm@lancaster.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): EIA Scoping Opinion request for the demolition of existing buildings/structures and proposed construction of major mixed use leisure development in association with Eden Project (including use classes E, F1, F2 and sui-generies) including public realm, landscaping, car parking and associated infrastructure and engineering works Location: Eden Project International, Central Promenade Regeneration Site, Marine Road Central, Morecambe, Lancashire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on 05 August 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have previously responded to the previous EIA Scoping Report (2019) on 03.07.2019. We have read through the EIA Scoping Report Addendum (July 2021) and concur with the proposal to include consideration of the increase in diffuse recreational pressure in the Environment Statement.

For clarity, we repeat our previous advice below and in Annex A.

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Liz Knowles on 0208 225 7506. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

Yours faithfully

Miss Elizabeth Knowles
Senior Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special

Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.
Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is adjacent to the following designated nature conservation sites:

- Morecambe Bay Special Area of Conservation (SAC), Morecambe Bay Ramsar site, Morecambe Bay & Duddon Estuary Special Protection Area (SPA) and Morecambe Bay Site of Special Scientific Interest (SSSI).

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- European site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

2.3 Regionally and Locally Important Sites
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes
As the development site is within sight of Arnside & Silverdale AONB, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for Arnside & Silverdale AONB.

Landscape and visual impacts
Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies

pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Air Quality
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

5. Climate Change Adaptation
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify

how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

6. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

From: Henriksen, Florence
Sent: 12 August 2021 16:18
To: dcconsultation
Subject: FW: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

From: Planning Liaison <Planning.Liaison@uuplc.co.uk>
Sent: 12 August 2021 16:11
To: Henriksen, Florence <fhenriksen@lancaster.gov.uk>
Subject: RE: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

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Dear Florence,

In response to Screening Request Ref: 21/00988/EIO United Utilities does not comment on Screening or Scoping Requests as the level of information we require in terms of understanding any water or wastewater requirements is likely to only become available once the development proposal is progressed nearer to planning application stage. Once the appropriate information is available, we would review and recommend any necessary planning conditions at the planning application consultation stage.

We do however, wish to continue to work closely with local authorities and developers alike in a bid to support sustainable development and economic growth. We would encourage potential developers to contact us at the appropriate time for pre-application discussions. Information for our pre-application services for both water and wastewater is available on our website.

Kind Regards,

United Utilities
Water for the North West

Shireen Lawrenson
Senior Planning Analyst
Planning, Landscape and Ecology
Email: Planning.Liaison@uuplc.co.uk
M: 07901111401
unitedutilities.com



Our Planning Team can be contacted by email at **Planning.Liaison@uuplc.co.uk**

From: Henriksen, Florence [mailto:fhenriksen@lancaster.gov.uk]
Sent: 05 August 2021 10:56
To: National Trust (NTRUST) (alan.hubbard@nationaltrust.org.uk) <alan.hubbard@nationaltrust.org.uk>; Lancashire Constabulary (ALO@lancashire.police.uk) <ALO@lancashire.police.uk>; Natural England (NATENG) (consultations@naturalengland.org.uk) <consultations@naturalengland.org.uk>; Environment Agency (ENVAGN) (clplanning@environment-agency.gov.uk) <clplanning@environment-agency.gov.uk>; County Highways (CE) (lhscustomerservice@lancashire.gov.uk) <lhscustomerservice@lancashire.gov.uk>; Highways England (HIGHWA) (PlanningNW@highwaysengland.co.uk) <PlanningNW@highwaysengland.co.uk>; Hewitson, Andrew <andrew.hewitson@lancashire.gov.uk>; Historic England (HISTEN) (e-nwest@HIstoricEngland.org.uk) <e-nwest@HIstoricEngland.org.uk>; Lead Local Flood Authority (LLFAconsultations@lancashire.gov.uk) <LLFAconsultations@lancashire.gov.uk>; Planning Liaison <Planning.Liaison@uuplc.co.uk>; clerk@morecambe.gov.uk; property <property@lancaster.gov.uk>; Network Rail (NRAIL) (Townplanninglnw@networkrail.co.uk) <Townplanninglnw@networkrail.co.uk>; South Lakeland District Council (SOULAK) (development.management@southlakeland.gov.uk) <development.management@southlakeland.gov.uk>; O'Neill, Matthew <moneill@lancaster.gov.uk>; recycling <recycling@lancaster.gov.uk>; Conservation Team <conservationteam@lancaster.gov.uk>; Environmental Health <environmentalhealth@lancaster.gov.uk>; Gray, Stefanie <sgray@lancaster.gov.uk>; Greater Manchester Ecology Unit (GMEU) (gmeu@tameside.gov.uk) <gmeu@tameside.gov.uk>; Wildlife Trust For Lancashire (kwisdom@lancswt.org.uk) <kwisdom@lancswt.org.uk>; County Archaeology (archaeology@lancashire.gov.uk) <archaeology@lancashire.gov.uk>; Arnside Silverdale AONB Unit (ARNSIL) (sue@arnsidesilverdaleaonb.org.uk) <sue@arnsidesilverdaleaonb.org.uk>; National Grid (plantprotection@cadentgas.com) <plantprotection@cadentgas.com>; Kaloudas, Christos <development.plans@enwl.co.uk>; Engineers <engineers@lancaster.gov.uk>; Fire Safety Officer (FPOL) (lancasterfiresafety@lancsfirerescue.org.uk) <lancasterfiresafety@lancsfirerescue.org.uk>; planningpolicy <planningpolicy@lancaster.gov.uk>; gary@baysearchandrescue.org.uk; Royal Society for the Protection of Birds (RSPB) (NWCasework@rspb.org.uk) <NWCasework@rspb.org.uk>
Subject: 21/00988/EIO - Eden, Central Promenade Regeneration Site, Marine Road Central, Morecambe

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Lancaster City Council EIA Scoping Opinion Consultation

Please see attached PDF document containing details of a Scoping Opinion you may wish to comment on.

If you have any queries please contact us via email at dm@lancaster.gov.uk.

Kind Regards

Florence Henriksen | Senior Planning and Building Technician | Planning and Place Service | Lancaster City Council

Tel: (01524) 582348 | *Email:* fhenriksen@lancaster.gov.uk
Postal Address: PO Box 4 | Town Hall | Dalton Square | Lancaster | LA1 1QR
Office Address: Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF

Please note that due to a number of vacant posts in the planning application team that have proved difficult to fill during the Covid-19 related lockdown, the council currently has a large backlog of valid planning related applications and pre-application enquiries. Understandably this is resulting in a significant volume of correspondence from concerned applicants and agents. In dealing with such correspondence it diverts our resources away from processing the applications. We would therefore respectfully ask for your patience as the council seeks to do all it can to bring in resources to tackle this backlog. In the interim please note that delays of many weeks will be incurred in processing and determining the applications and pre-application enquiries. We apologise for any inconvenience caused.

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