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 June 2019

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

Dear Colleague

Re: EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works at Central Promenade Regeneration Site, including Morecambe Bay; Land North of Marine Road Central (from stone jetty to car park opposite Green St); Land north-west of Morecambe Railway St, Marine Road Central, Morecambe, Lancashire at Croziers Croft, Moss Lane, Silverdale, Carnforth, Lancashire; Reference 19/00758/EIO

Thank you for your letter of 18th June requesting the AONB Partnership's comments in relation to this EIA Scoping request.

Within the Landscape, seascape, townscape and visual amenity section, we support the proposed viewpoints 12 (View from the PRoW between Park Point and Far Arnside, within the Arnside & Silverdale AONB) and 13 (View from Warton Crag looking south across Morecambe Bay).

We also recommend the inclusion of additional viewpoints in the AONB: Jack Scout, Arnside Knott and King William's Hill. It is important that viewpoints on Warton Crag and Arnside Knott are at an appropriate location where the Eden project site can actually be seen, such as the lower outcrops on Warton Crag and Heathwaite on Arnside Knott.

Yours sincerely

S. M. Hunter

Sue Hunter
AONB Officer

Sent: 21 June 2019 18:13

To: dcconsultation

Subject: Eden Project scoping. 19/00758

Dear Sir / Madam

With respect to the proposed planning application.

From a professional rescue view point, I cannot raise any objection to the project. Morecambe Bay is supported by highly trained rescue organisations such as ourselves the RNLI and the Coastguard, each providing unique assets and together make the Bay a safer place than it ever has been previously.

The proposed plans I'm sure would only stand in time to raise public awareness and add to the safety.

If you require any further information please do not hesitate to contact me.

Kind Regards

Gary Parsons

Gary J Parsons

Commanding Officer

Founding Member & Trustee

Bay Search and Rescue

Flookburgh UK

gary@baysearchandrescue.org.uk



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

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

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

Date: 27/06/2019
Our Ref: NW_GW1A_3NWP_018367
Your Ref: 19/00758/EIO
RE: Formal Planning Application, Land North-West Of Morecambe Railway St, Marine Road Central, Morecambe, Lancashire, LA4 4NJ

Thank you for your enquiry which was received on 20/06/2019.
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

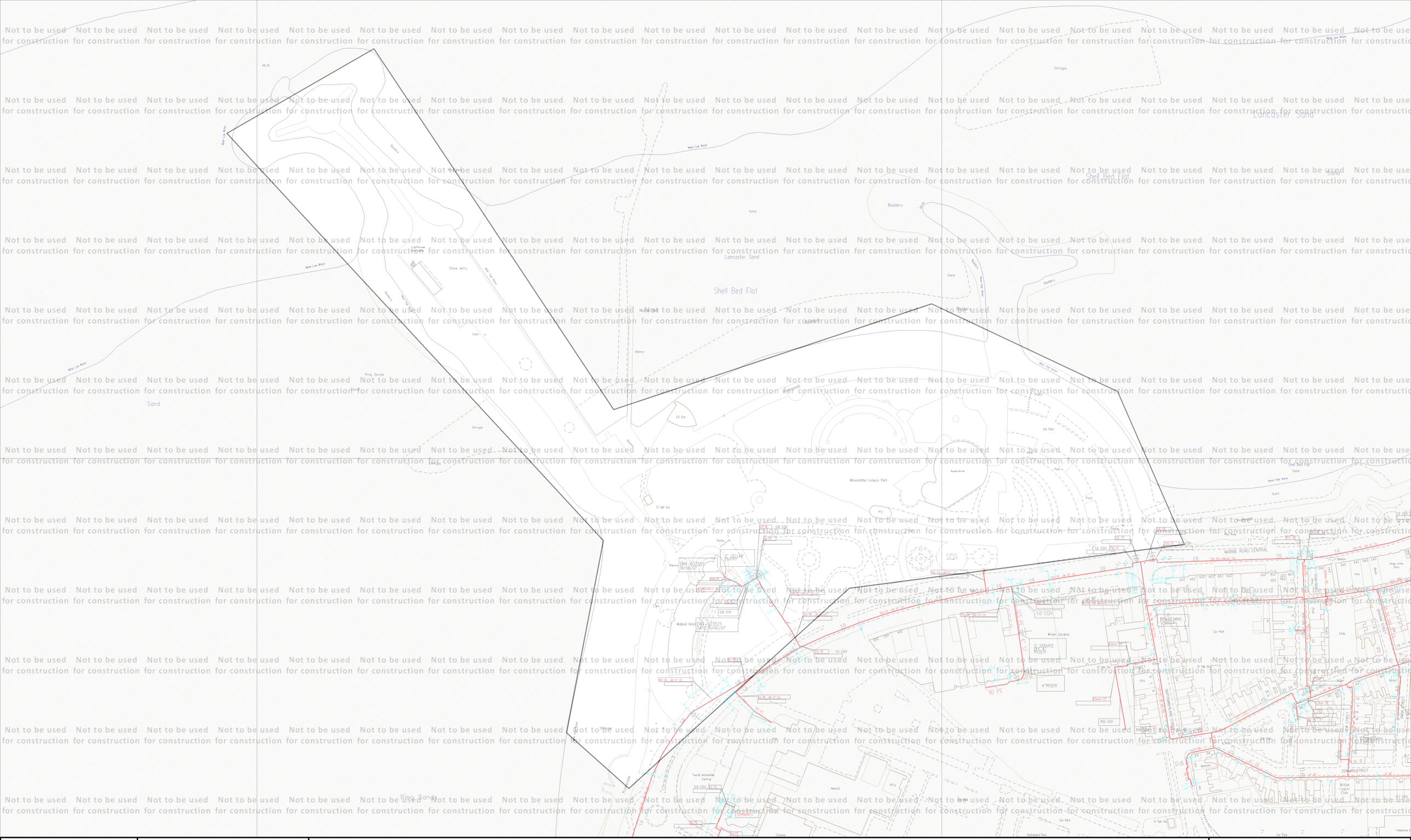
General Guidance document:
http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103

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.

Not to be used for construction



ID: NW_GW1A_3NWP_018367	View extent: 1030m, 610m	Do not proceed without further consultation
USER: natasha.hopka	LP MAINS MP MAINS IP MAINS LHP MAINS NHP MAINS	This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.
DATE: 27/06/2019		
DATA DATE: 26/06/2019		
REF: 19/00758/EIO		
MAP REF: SD4264 CENTRE: 342828, 464529	0m 50m Approximate scale 1:2500 on A3 Colour Landscape	
Some examples of Plant Items: Valve, Depth of Cover, Syphon, Diameter Change, Material Change, Out of Standard Service		

Map 1 of 1 (GAS)

MAPS Plot Server Version 1.11.0

Cadent

Your Gas Network

Requested by: Lancaster City Council

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ENQUIRY SUMMARY

Received Date
20/06/2019

Your Reference
19/00758/EIO

Location
Centre Point: 342828, 464529
X Extent: 700
Y Extent: 540
Postcode: LA4 4NJ
Location Description: Land North-West Of Morecambe Railway St, Marine Road Central, Morecambe, Lancashire, LA4 4NJ

Map Options
Paper Size: A3
Orientation: LANDSCAPE
Requested Scale: 2500
Actual Scale: 1:2500 (GAS)
Real World Extents: 1030m x 610m (GAS)

Recipients
pprsteam@cadentgas.com

Enquirer Details
Organisation Name: Lancaster City Council
Contact Name: DM Technical Team
Email Address: dm@lancaster.gov.uk
Telephone: 01524 582950
Address: PO Box 4, Town Hall, Lancaster, LA1 1QR

Description of Works
PA - scoping opinion

Enquiry Type
Formal Planning Application

Development Types
Development Type: Development for use by General Public

From: .box.plantprotection <plantprotection@cadentgas.com>
Sent: 28 June 2019 12:57
To: developmentcontrol
Subject: Our Ref: NW_GW1A_3NWP_018367 Your Ref: 19/00758/EIO Site Address: Land North-West Of Morecambe Railway St Marine Road Central Morecambe Lancashire LA4 4NJ

Planning,

Should you be minded to approve this application please can the following notes be included an informative note for the Applicant

****PLEASE NOTE – the below information is related to Low and Medium Pressure Assets. You may be contacted separately by our engineers regarding High/Intermediate Pressure Pipelines.****

Considerations in relation to gas pipeline/s identified on site:

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance.

If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays.

If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required.

All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.

Email: plantprotection@cadentgas.com Tel: 0800 688 588

Kind regards
Plant Protection

Cadent Gas Ltd
Block 1, Floor 1, Brick Kiln Street, Hinckley LE10 0NA
T 0800 688 588
plantprotection@cadentgas.com
cadentgas.com

Self Service for Plant Enquiries:

www.beforeyoudig.nationalgrid.com

please consider the environment - do you really need to print this email?

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From: Atkinson, Megan
Sent: 11 July 2019 13:29
To: Rehman, Jennifer
Subject: Application ref: 19/00758/EIO - Central Promenade Regeneration Site, Morecambe

Jen,

The proposed development could potentially have an impact on the setting and significance of designated and non-designated heritage assets, therefore we would wish to see an Environment Statement assess the impacts on the heritage significance.

The designated heritage assets likely to be affected within and outside the site:

- Morecambe Conservation Area
- Midland Hotel – Grade II*
- Winter Gardens – Grade II*
- War Memorial – Grade II
- Former Station building and lighthouse – Grade II
- The Platform – Grade II
- 217-221 Marine Road Central – Grade II
- Clock Tower – Grade II
- Queen's Hotel – Grade II
- Barclays Bank – Grade II
- 333-335 Marine Road Central – Grade II
- 336-342 Marine Road Central – all Grade II
- St Patrick's Chapel – Scheduled Monument
- Ashton Memorial – Grade I

There are also two Non-Designated Heritage Assets, which are considered landmarks within Morecambe, the setting and significance of which would likely be impacted by the proposed development. These include 206 and 207 Marine Road Central.

Due to the proposed height of the main structure of the development, wider views from district would likely be affected. I assume the proposed viewpoints are for further CGIs and landscape and visual impact assessment? This would be an important part of the assessment of the impact on the setting and significance of the heritage assets.

Appendix 9.2 (Zone of Theoretical Visibility) identifies 15 viewpoints but Appendix 9.5 (Photosheets and Viewpoints) only includes 12 viewpoints. I think there are a couple others than could be considered, including Ashton Memorial and potentially Jubilee Tower (although I realise that is outside the boundary of assessment).

Kind regards,

Megan Atkinson BA(Hons) MSc IHBC
Conservation Officer

Email: matkinson@lancaster.gov.uk
Telephone: (01524) 582338
Mail to: Economic Growth and Regeneration
Conservation Team | PO Box 4 | Town Hall | Dalton Square | Lancaster | LA1 1PJ
www.lancaster.gov.uk/planning/conservation

Our ref: NO/2019/111849/01-L01
Your ref: 19/00758/EIO

Date: 09 July 2019

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

Dear Sir/Madam

EIA SCOPING 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 A1, A3, A4, B1, D1, D2 AND SUI GENERIS) INCLUDING PUBLIC REALM, LANDSCAPING, CAR PARKING AND ASSOCIATED ENGINEERING WORKS.
CENTRAL PROMENADE REGENERATION SITE, INCLUDING MORECAMBE BAY; LAND NORTH OF MARINE ROAD CENTRAL (FROM STONE JETTY TO CAR PARK OPPOSITE GREEN ST); LAND NORTH-WEST OF MORECAMBE RAILWAY ST MARINE ROAD CENTRAL MORECAMBE LANCASHIRE

Thank you for consulting us on the above.

Environment Agency position
We have reviewed the Environmental Impact Assessment Scoping Report, produced by WSP dated June 2019 and would like to make the following comment in relation to the sections relevant to the remit of the Environment Agency.

Hydrology, drainage and flood risk
We are satisfied with the scoping of this section. We would welcome further consultation on flood risk management for this development, as this is considered in more detail.
It must be satisfactorily demonstrated that the development will be safe for its lifetime without increasing risk elsewhere and where possible reduces flood risk overall, taking into account climate change. The application would be supported by a separate Flood Risk Assessment

Environmental permit - advice to applicant
The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)

- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact Stephanie.Bracegirdle@environment-agency.gov.uk to discuss the requirements for an environmental permit. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Biodiversity
We agree in principle with the approach outlined in the EIA scoping report.

The development has the potential to impact on Morecambe bay designated sites, specifically intertidal mud and sandflats and associated species.
The environmental statement should show potential impacts on Morecambe Bay protected sites both within and adjacent to the proposed development, and state mitigation proposals to address the impacts.
This information would inform the Habitats Regulation Assessment which will need to be provided alongside the EIA.

Biodiversity net gain
All developments are required to contribute towards biodiversity net gain and we would like to see the EIA exploring the biodiversity net gain opportunities that could be gained with this development.
The large scale of the development and its high public profile will provide an opportunity to showcase how biodiversity net gain can be delivered, both on and off site, from this type of project.

Yours faithfully

Mrs Liz Locke
Sustainable Places Officer

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

End

From: Cartmell, Paul
Sent: 22 July 2019 12:33
To: Frith, Joseph
Subject: RE: 19/00758/EIO - request for comments - Noise and Air Quality

Dear Joseph

I have looked at the scoping proposal and would comment as follows:-

Noise and Vibration

1. In addition to residential receptors, the EIA should consider its impact on commercial land uses and also impact on ecological receptors.
2. Transport arrangements proposals to and from the site will need to inform the noise assessment.
3. Given proposed opening times (until midnight) the assessment will need to consider nightime impacts.
4. The assessment will need to consider the potential impact arising from 'events' held at the proposed development site or other specific activities where noise impacts may arise.
5. The assessment will need to consider the impact of construction traffic and construction activities
6. The assessment should consider Control of Pollution Act 1974 arrangements.
7. The selection of construction methods should seek to minimise any noise/vibration impacts on existing receptors
8. The assessment should consider the needed for site managed noise monitoring provision during the construction and operational phases

Air Quality/Dust/Odour

1. ***The Council is currently in the process of producing a new Air Quality Action Plan (AQAP) for the Lancaster district. This plan is unlikely to be adopted before the submission of this application, however given the significance of this development, it is suggested and hoped that plans put forward for this application can and will provide/contribute to actions in the final plan (currently under development). Discussion on proposals to be put forward and their assessment (particularly relating to transport), would therefore be welcomed and seen as very important for this application and the local plan. The final AQAP plan is due to be adopted in 2020. .***
2. The development assessment needs also to take account of the adopted Low Emission and Air Quality PAN and particularly methodology for assessment of mitigation proposals.
3. The assessment should consider the need for air quality monitoring during the construction phase
4. The assessment should consider the impact on human and ecological receptors
5. Transport arrangements proposals to and from the site will need to inform the air quality assessment.
6. Any point sources of air pollution will need to be considered in the assessment (new or existing)
7. If any odourous activities are anticipated these should be considered in the assessment.
8. Should any land contamination present specific issues, these should be considered in the assessment.
9. The assessment should inform the choice of routes for construction traffic.
10. The provision of electric vehicle transport options should be a key consideration for the application/assessment.

Please contact me for discussion/clarification/progress regarding any of the above matters.

Best Regards
Paul

Paul Cartmell - Senior Environmetal Health Officer - Pollution Control - Environmental Protection Team, Communities and the Environment Directorate, Morecambe Town Hall, Marine Road East, Morecambe Lancashire, LA4 4AF - pcartmell@lancaster.gov.uk - Tel. 01524 582728.

General Office - environmentalhealth@lancaster.gov.uk Tel. 01524 582935

From: Frith, Joseph <jfrith@lancaster.gov.uk>
Sent: 19 July 2019 14:26
To: Lead Local Flood Authority (LLFA) (suds@lancashire.gov.uk) <suds@lancashire.gov.uk>; clerk@morecambe.gov.uk; Public Rights of Way LCC (PROWplanning@lancashire.gov.uk) <PROWplanning@lancashire.gov.uk>; development.management@southlakeland.gov.uk; Network Rail (NRAIL) (Townplanninglnw@networkrail.co.uk) <Townplanninglnw@networkrail.co.uk>; National Trust (NTRUST) (alan.hubbard@nationaltrust.org.uk) <alan.hubbard@nationaltrust.org.uk>; Electricity North West (development.plans@enwl.co.uk) <development.plans@enwl.co.uk>; Stainton, Rachel <rstainton@lancaster.gov.uk>; Cartmell, Paul <pcartmell@lancaster.gov.uk>
Subject: 19/00758/EIO - request for comments

Good afternoon all,

Please see attached second request for comments on the above application for Eden Project North, if you have not responded, nor do not wish to do so please can you notify us in writing no later than 26th July 2019.

Please send any correspondence to dm@lancaster.gov.uk quoting the reference 19/00758/EIO

We look forward to hearing from you

Kind Regards,

Joe Frith

Development Management Team l Directorate For Economic Growth and Regeneration l Lancaster City Council

PO Box 4 l Lancaster Town Hall l Dalton Square l Lancaster l LA1 1QR

☏: *(01524)* 582950 ✉: dm@lancaster.gov.uk : www.lancaster.gov.uk

From: developmentcontrol
Sent: 20 June 2019 10:17
To: dcconsultation
Subject: FW: App 19/00758/EIO EIA Scoping for the Eden Project International Ltd, Central Promenade Regeneration Site, Morecambe - Ecology response

From: Derek Richardson [mailto:derek.richardson@tameside.gov.uk]
Sent: 20 June 2019 10:07
To: developmentcontrol <developmentcontrol@lancaster.gov.uk>
Subject: App 19/00758/EIO EIA Scoping for the Eden Project International Ltd, Central Promenade Regeneration Site, Morecambe - Ecology response

Dear Sir/Madam

Thank you for consulting the Ecology Unit on the above EIA Scoping Request. I have the following comments.

Designated Nature Conservation Sites

While the application site itself is not of substantive nature conservation value the proposed development boundary is adjacent to internationally important wildlife sites. The site also includes boulders used for marine defences, along with intertidal sand and mudflats, adjacent to and within Morecambe Bay and Duddon Estuary, which is internationally designated as a Special Protection Area (SPA) and Ramsar site for the estuarine habitats it contains and the waterbird and seabird populations it supports. This area is also internationally designated as a Special Area of Conservation (SAC) for the estuarine habitats it supports. The SPA, Ramsar and SAC designations are broadly co-located with the Morecambe Bay Site of Special Scientific Interest (SSSI), which is also designated for its range of estuarine and marine habitats, birds, plants and invertebrate fauna. The scale and type of the proposed development, and the intention to attract very large numbers of visitors to the Eden Project (North), has significant potential to cause harm to the special interest of the designated sites, particularly by causing disturbance to Birds, both during the construction and the operation of the development.

Given the potential of the development proposal to cause harm to European designated sites then under the terms of Conservation (Habitats and Species) Regulations 2017 (as amended), and based on information presented in a future Environmental Statement, the Council will need to undertake a Habitats Regulations Assessment (HRA) of the development proposal. To enable the Council to undertake this Assessment it is essential that any potentially harmful impacts arising from the development on the nearby European sites are identified in the ES and that comprehensive mitigation proposals for any identified harmful impacts are put forward as part of the EIA.

It is noted that it is not currently proposed to undertake further bird survey work at the site to inform the EIA because the applicant considers that the wealth of existing bird data for this area is considered to cover a sufficient time period and is of sufficient detail to enable a full assessment to be undertaken of potential impacts on birds associated with nearby protected sites including the Morecambe Bay and Duddon Estuary SPA and the Morecambe Bay Ramsar and SSSI. I note that this approach has been agreed with Natural England. I would defer to the views of Natural England on this point because I have not seen

the full extent of the bird data described. Natural England will of course need to be consulted on any future application / EIA.

Other species

Internal and external inspections of all buildings affected by the proposed development for roosting bats should be undertaken to inform the EIA.

Surveys of the site for invasive plant species should also be carried out to inform the EIA.

Biodiversity Net Gain

The NPPF requires developments to contribute to an overall Net Gain in Biodiversity, and the UK Government has indicated that Biodiversity Net Gain will likely be mandated within the next year for most development. The scale and type of this planned development is such that it has the potential to contribute to Net Gain. This potential should be fully explored in the EIA.

I hope that these comments are useful. Please contact me if you have any questions.

Yours sincerely
Derek Richardson

Derek Richardson
Principal Ecologist
Strategic Infrastructure
Development and Investment
Growth

Tameside MBC | Twitter | Facebook | Instagram
Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. 0161 342 2593
Mobile. 07709 394502

Email Disclaimer http://www.tameside.gov.uk/disclaimer



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

Direct Line: 0300 470 5226

5 July 2019

Planning and Housing Policy Team
Regeneration and Planning
Lancaster City Council
PO Box 4
Town Hall
Dalton Square
Lancaster
LA1 1PJ

Dear Sir / Madam,

EIA Scoping request for the demolition of existing buildings/structures and proposed construction of major mixed-use leisure development in association with Eden Project North, Central Promenade, 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 / Indigo Planning. We further note that proposed development would attract a maximum one million visitors per annum, with an estimated annual averge visitor number of 760,000. Although the site is remote from the SRN itself, this level of patronage would may have implications for the SRN. We therefore comment on the topics we feel are relevant, below.

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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

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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).

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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;*
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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.

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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:

- 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;

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- 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.

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.

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**.

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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 TD52/17 *'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 considerable.

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

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

Direct Dial: 0161 242 1416

Our ref: PL00592045

9 July 2019

Dear Sir/Madam

Re: Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St); Land NorthWest Of Morecambe Railway St Marine Road Central, Morecambe, Lancashire Environmental Impact Assessment (EIA) Scoping Report

Thank you for your letter of 18th June 2019 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.

Our initial assessment shows the attached list of designated heritage assets within the area of the proposed development, in particular:

- The Winter Gardens - Grade II*
- Midlands Hotel - Grade II*
- Former Station Building and Lighthouse, Stone Jetty - Grade II

The Environmental Statement should 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) and relevant local authority staff.

We recommend that you continue to engage with the Conservation Officer of Lancaster City Council and the archaeological staff at Lancashire Archaeological Advisory Service in the development of this assessment. They are best placed to

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advise on: local historic environment issues 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.
Given the potential heights of the structures associated with the proposed development and the surrounding landscape character, this development is could be visible across a very large area. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood and 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,

Marie Smallwood
Principal Inspector of Historic Buildings and Areas
marie.smallwood@HistoricEngland.org.uk

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Rachel Hines
Designing Out Crime Officer
Lancashire Constabulary HQ
Saunders Lane
Hutton
Preston
Lancashire
PR4 5SB

24th June 2019

Crime Impact Statement

Planning Reference – 19/00758/EIO

Proposal: EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works

Address - Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St); Land North-West Of Morecambe Railway St, Marine Road Central, Morecambe, Lancashire,

Dear Planning Officer,

I refer to the above application and would like to thank you for the opportunity to comment on the proposal. At this Scoping stage in the planning process the associated documentation submitted with the application is limited. I will therefore make general security recommendations in this report and I ask that the applicant and developer are signposted at the earliest opportunity to the Lancashire Constabulary Designing Out Crime Officers. ***A suitable crime prevention strategy should be developed for this scheme at the earliest opportunity.***

A development of this size and scale that incorporates large areas of public open space, leisure and A4 licensing uses will create additional demand on Lancashire Constabulary Officers with calls for service. It is crucial that the enablers to crime are designed out of the location as early as possible so that opportunities to criminals are minimised. Other departments within Lancashire Constabulary will need to comment on this proposal as it progresses including Licensing and Counter Terrorism.

The following security measures should be incorporated into the design in order to keep people safe and feeling safe and to reduce the opportunity for crime, disorder and anti-social behaviour-

- All of the separate elements of the mixed use scheme should be designed to achieve the police preferred security standard **Secured by Design**. There is a specific design guide for commercial schemes. Further details can be found at www.securedbydesign.com As a minimum, all external door sets and those high-risk internal doors such as storerooms housing valuable items, CCTV equipment or cash should be certified to LPS 1175, PAS24:2016; STS 201 or STS 202 or other equivalent/higher security standards. This includes sliding/opening doors that incorporate electrically operated release locks, such as ‘mag-locks’, as they must be strong enough to withstand attempts of forced entry with pressure or body weight. Glazing must include one pane of laminated glass that is securely fixed in accordance with the manufacturer’s instructions and certified to BS EN 356 2000

rating P1A. Each of the buildings should be fitted with a monitored intruder attack alarm system.

- Lighting has a significant impact on crime and anti-social behaviour. A good lighting scheme enhances natural surveillance and makes criminals feel uncomfortable operating in that environment. The scheme should have a lighting plan designed by a qualified lighting engineer that discourages criminal activity and reduces the fear of crime amongst legitimate users of the space. All doors including emergency exits should be illuminated with anti-vandal proof dusk till dawn lighting.

- The area of public realm should be designed so that natural surveillance across all areas is maximised. Street furniture should be incorporated where it will be utilised by legitimate users of the area and not as an enabler to anti-social behaviour. Security Rated anti ram raid bollards should be incorporated into the design.

- The car park should be designed and built to achieve the Safer Parking Park Mark award to prevent vehicle crime. Further details can be found at www.parkmark.co.uk

- A recorded HD digital 1080p (as a minimum standard) IP capable colour CCTV system should be installed to BS EN 62676 series. Captured images must be clearly marked with the time, date and location to aid detection should an offence occur. Cameras must not be located where they can be easily disabled or tampered with; however, if they can then they must be housed in a casing to protect them from damage or mounted on dedicated anti-climb 'poles'.

  Where onsite CCTV recording equipment is utilised, it must be stored in a secure and alarmed room within a lockable steel cabinet. This room should have solid walls and no windows, and only be accessed by authorised trained staff in system use and image retrieval. Recorded data should be stored for a 30-day period, before deletion and where not required for evidential purposes. The CCTV system must comply with the principles of the General Data Protection Regulation (GDRP) 2018, in conjunction with the Data Protection Act 2018, and be registered with the Information Commissioner's Office. The GDPR provides a more comprehensive framework for personal data handling i.e. collection, processing and storage. Further guidance and a self-assessment tool can be found at the ICO's website www.ico.org.uk
  Adequate clear signage should inform users of the site that CCTV is present and in operation, and in accordance with GDPR.

- The landscaping plan should be designed so that it does not hinder sightlines and natural surveillance across the scheme. The lighting, landscaping and CCTV schemes should be developed in conjunction so one does not have a negative impact on the other. This is especially important during the summer months where dense foliage may have an adverse impact on the CCTV system and lighting provision. In addition, plant growth above 1m and below 2m should be absent to provide a window of surveillance. Planting around the parking areas should be kept under 500mm in height to support natural surveillance and deter vehicle interference. A landscaping maintenance plan should be developed for the site.

- Unfortunately, there have been reported thefts and burglaries at construction sites across Lancashire. High value plant machinery, hand and power tools, lead and metal piping, insulation materials and boilers have all been targeted, with some stolen items used to commit further criminal offences. This is placing additional demand on local policing resources.

- The site must be secured throughout the construction phase with adequate security measures, including a;
- Robust 2.4m high anti-climb weld mesh perimeter fence with matching lockable gates;
- Monitored alarm system (with a response provision) for site cabins where tools, materials and fuel could be stored;
- Monitored and/or recorded HD digital colour CCTV system, accredited with either National Security inspectorate (NSI) or Security Systems & Alarm inspection Board (SSAIB) approval. Any onsite CCTV recording equipment must be stored securely and located within an alarmed building/cabin.

The above security measures should be incorporated into the scheme in accordance with;

National Planning Policy Framework
8. Promoting healthy and safe communities
91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

12. Achieving well-designed places 127 – Planning Policies and Decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users46; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

I hope the above is of assistance in your Councils determination of the application. Should you require anything else in respect of this matter, please do not hesitate to contact me.

Yours sincerely

R.Hines

Rachel Hines
Designing Out Crime Officer
Lancashire Constabulary

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

Direct Line: 0300 470 5226

5 July 2019

Planning and Housing Policy Team
Regeneration and Planning
Lancaster City Council
PO Box 4
Town Hall
Dalton Square
Lancaster
LA1 1PJ

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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:

- 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;

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- 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.

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.

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**.

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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 TD52/17 *'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 considerable.

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

disability confident COMMITTED

OFFICIAL

lancaster City Council
Planning Department
Town Hall
Dalton

Lancaster

Please ask for: Wayne Norris
Telephone: 0152432311/
Email: WayneNorris@lancsfirerescue.org.uk
Your Ref: ***19/00758/EIO***
Our Ref:
Date: 21 June 2019

Dear Sirs

PROPOSED PLANNING APPLICATION CONSULTATION

Application No: 19/00758/EIO
Proposal: EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated

Site Address: Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St); Land North-West Of Morecambe Railway St 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

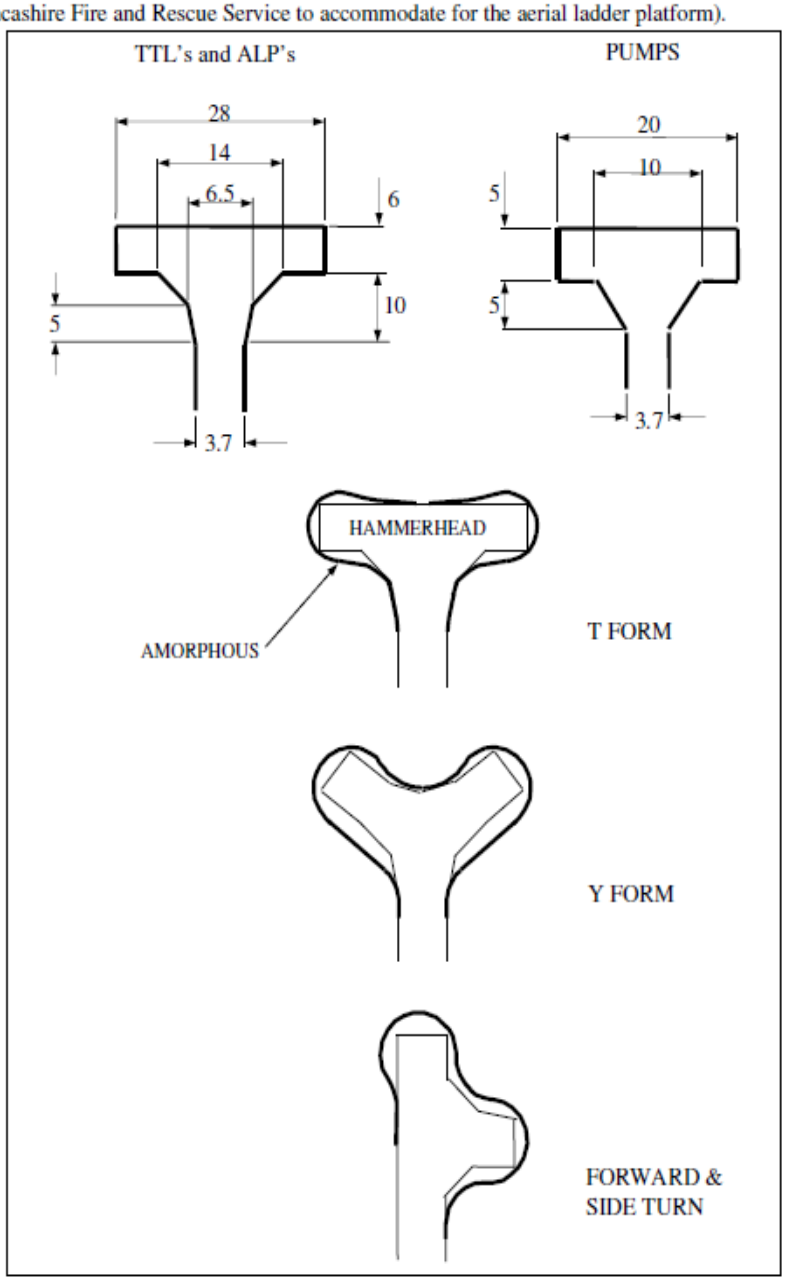
It should be ensured that the scheme fully meets all the requirements of Building Regulations Approved Document B, Part B5 ‘Access and facilities for the Fire Service’.

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/

Yours sincerely

Wayne Norris

Business Safety Adviser
for Chief Fire Officer

From: Henriksen, Florence
Sent: 19 June 2019 12:42
To: dcconsultation
Subject: FW: 19/00758/EIO

From: Edwards, Mark <medwards@lancaster.gov.uk>
Sent: 19 June 2019 11:46
To: Henriksen, Florence <fhenriksen@lancaster.gov.uk>
Subject: RE: 19/00758/EIO

Florence,
There may be soil contamination issues and consequently I would wish to see this aspect, including any planned remediation etc addressed in an ES. This is normally done under the Soil Quality, or similar, section of the Statement when the developers obtain baseline information.

Mark

From: Henriksen, Florence <fhenriksen@lancaster.gov.uk>
Sent: 18 June 2019 12:52
To: planningpolicy <planningpolicy@lancaster.gov.uk>; O'Neill, Matthew <moneill@lancaster.gov.uk>; Conservation Team <conservationteam@lancaster.gov.uk>; Cartmell, Paul <pcartmell@lancaster.gov.uk>; Stainton, Rachel <rstainton@lancaster.gov.uk>; Edwards, Mark <medwards@lancaster.gov.uk>; Inman, Julian <JInman@lancaster.gov.uk>; Engineering <Engineering@lancaster.gov.uk>; Bale, Eleanor <ebale@lancaster.gov.uk>; Griffith, William <wgriffith@lancaster.gov.uk>; Greater Manchester Ecology Unit (GMEU) (gmeu@tameside.gov.uk) <gmeu@tameside.gov.uk>; David Morris <David.Morris@rspb.org.uk>; Wildlife Trust For Lancashire (kwisdom@lancswt.org.uk) <kwisdom@lancswt.org.uk>; Lancashire Archaeological Advisory Service (archaeology@lancashire.gov.uk) <archaeology@lancashire.gov.uk>; Arnside Silverdale AONB Unit (ARNSIL) (sue@arnsidesilverdaleaonb.org.uk) <sue@arnsidesilverdaleaonb.org.uk>; Bartlett, Mark <mbartlett@lancaster.gov.uk>; National Grid (plantprotection@cadentgas.com) <plantprotection@cadentgas.com>; waynenorris@lancsfirerescue.org.uk
Subject: 19/00758/EIO

Dear All

We have recently received the above application and are requesting your comments in relation to the scoping opinion request as required under section 15 (4) of the Town and Country Planning (EIA) Regulations 2017.

Please see the attached letter.

Regards

Florence Henriksen | Planning & Building Control Technician | Directorate for Economic Growth and Regeneration | Lancaster City Council
☏: *(01524)* 582950 ✉: fhenriksen@lancaster.gov.uk

Lancashire County Council

Phone: 0300-123-6780
Email: Suds@lancashire.gov.uk

Date: 30/07/19

APPLICATION CONSULTATION RESPONSE

Application Number:	19/00478/EIO
Location:	Land North-West Of Morecambe Railway St Marine Road Central Morecambe Lancashir
Proposal:	EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works | Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the above application. The Flood and Water Management Act 2010 sets out the requirement for LLFAs to manage 'local' flood risk within their area. 'Local' flood risk refers to flooding or flood risk from surface water, groundwater or from ordinary watercourses.

Comments provided in this representation, including conditions, are advisory and it is the decision of the Local Planning Authority (LPA) whether any such recommendations are acted upon. It is ultimately the responsibility of the Local Planning Authority to approve, or otherwise, any drainage strategy for the associated development proposal. The comments given have been composed based on the current extent of the knowledge of the LLFA and information provided with the application at the time of this response.

Lead Local Flood Authority Position

The LLFA agree with the scope of the WSP/Indigo, Environmental Impact Assessment Scoping Report, June 2019, section 13. Hydrology, drainage and flood risk.

Before submitting a planning application we recommend discussing your proposed development with Lancashire County Council as the Lead Local Flood Authority. It

has been recognised that there are clear benefits for early engagement in the planning process to support developers and provide relevant, accurate up to date advice regarding flood risk and land drainage. This charged for service is offered to prevent any issues that could potentially affect your application.

To organise a Pre App with the LLFA please email Suds@lancashire.gov.uk

Yours faithfully,

Alistair Graham
Lead Local Flood Authority

Sent: 05 August 2019 13:06
To: Frith, Joseph
Subject: RE: 19/00758/EIO - request for comments

Dear Joe

I am writing to confirm that the Town Council does not wish to submit any comments regarding the scoping application submitted in respect of the proposed Eden Project.

Thank you

Kind regards

David

David Croxall

David Croxall
Clerk to Morecambe Town Council
Town Hall
Marine Road
Morecambe
LA4 5AF

Date: 03 July 2019
Our ref: 286283
Your ref: 19/00758/EIO

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

T 0300 060 3900

Lancaster City Council

dm@lancaster.gov.uk
BY EMAIL ONLY

Dear Sir or Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works.
Location: Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St); Land North-West Of Morecambe Railway St, 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 18 June 2019.

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.

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 Elizabeth 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.

Yours faithfully

[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/

Miss Elizabeth Knowles
Lead 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 within and 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 this site 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. Access and Recreation
Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

5. 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.

6. 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.

7. 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.

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Lancaster City Council
P O Box 4 Town Hall
Lancaster
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Your ref: 19/00758/EIO
Our ref: DC/19/2917
Date: 16-JULY-19

Dear Sir/Madam

Location: Central Promenade Regeneration Site, Including Morecambe Bay; Land North Of Marine Road Central (from Stone Jetty To Car Park Opposite Green St); Land North-West Of Morecambe Railway St, Marine Road, Central Morecambe.
Proposal: EIA Scoping 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 A1, A3, A4, B1, D1, D2 and Sui Generis) including public realm, landscaping, car parking and associated engineering works.

United Utilities Water Limited ('*United Utilities*') wishes to provide the following comments regarding the above request for an EIA scoping opinion.

We strongly recommend the applicant engages with United Utilities directly using our water and wastewater pre-development enquiry service, which is currently free of charge. Details of the water and wastewater pre-development enquiry service can be found at https://www.unitedutilities.com/builders-developers/pre-development/.

Water and Wastewater Services

United Utilities wishes believes that any application should be informed by a site-wide strategy for:

- the sustainable management of surface water. The management of surface water is something which should be considered early in the design and masterplanning process and incorporated into the blue and green infratructure;
- the delivery of foul water infrastructure;
- the delivery of clean water supply; and
- water efficiency.

United Utilities advises the following key points should be adhered to.

1) Foul and surface water should be drained on separate systems.

2) As noted above, any development proposal should be informed by a site-wide strategy for infrastructure.

3) The submission should fully investigate the surface water hierarchy, including the potential for infiltration via the submission of infiltration tests in accordance with BRE 365, and ensure surface water is discharged to the most sustainable available option. This reflects the surface water hierarchy, which is outlined in National Planning Practice Guidance and referred to in Policy DM34 of the emerging Lancaster Development Management DPD (Submission Draft, May 2018). The approach to surface water management should also be in accordance with the requirements of the non-statutory technical standards for sustainable drainage produced by Defra.

4) We would expect there to be no reliance on the public sewer for the drainage of surface water.

5) In accordance with Paragraph 165 of the National Planning Policy Framework, the applicant should ensure the inclusion of sustainable drainage for the management of surface water.

   The sustainable drainage systems should have multi-functional benefits and be designed in accordance with '*The SuDS Manual C753 - CIRIA*'. Development proposals would be expected to include genuine above ground sustainable drainage systems as opposed to underground tanked storage systems for surface water. We do not believe that a tanked sewer system is the most appropriate way forward for the surface water drainage strategy. The incorporation of above ground SuDS creates real opportunities for the Eden project in terms of a high quality green and blue water environment providing amenity and biodiversity benefits.

   SuDS must be considered as one of the key design considerations from the very start of projects, exploring innovative solutions that form an integral part of the overall scheme. Developers should seek to maximize opportunities for using space in a multi-functional way and for enabling SuDS features to form part of the character of the development.

6) We recommend the inclusion of water efficiency measures in the design of new development.

7) Any submission should fully consider all flood risk issues associated with the development of this site. The areas of the site, which are most suited to the management of surface water should be a key design consideration and an early component of the design process for the design and masterplanning of development. It should inform the location of blue and green infrastructure to enhance local amenity and biodiversity benefits.

8) In order to mitigate against flood risk, we also recommend that careful consideration is given to the finished floor levels of the proposed new building(s) compared with surrounding land. It is good practice for the finished floor levels to be higher than the manhole cover levels on the receiving sewer.

9) A drainage strategy should identify possible connection points to the public sewerage network and clean water networks in liaision with United Utilities. United Utilities may wish to specify alternative points of connection in accordance with our powers under the Water Industry Act.

10) The strategy for wastewater infrastructure should seek to avoid the need for pumped solutions wherever possible.

11) If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If any infrastructure upgrades are necessary, it may be necessary to co-ordinate the delivery of development with upgrades to infrastructure.

12) The applicant should give consideration to the approach to management and maintenance of any on-site sustainable drainage systems. If the applicant intends to offer sustainable drainage for future adoption, it will be imperative that the design meets the requirements of any future Sewers for Adoption.

13) United Utilities are not responsible for advising on rates of discharge to the local watercourse system and therefore we recommend the applicant engages with the Lead Local Flood Authority and, if appropriate, the Envionment Agency regarding their proposals.

14) The applicant will need to consider any protective provisions that are necessary during construction and during the operational life of the development to ensure appropriate protection for the assets of United Utilities. This is considered further below.

United Utilities' Assets and Property Interests

Water Mains
Water mains cross this site. As we need unrestricted access for operating and maintaining them, we will not permit development over or in close proximity to the mains. We require an access strip as detailed in our '*Standard Conditions for Works Adjacent to Pipelines*', a copy of which is enclosed.

The applicant must comply with our '*Standard Conditions*' document. This should be taken into account in the final site layout, or a diversion may be necessary. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion required as a result of any development will be at the applicant's expense. If considering a water mains diversion, the applicant should contact United Utilities at their earliest opportunity as they may find that the cost of mains diversion is prohibitive in the context of their development scheme. The Water Industry Act 1991 affords United Utilities specific rights in relation to the maintenance, repair, access and protection of our water infrastructure.

- Sections 158 and 159, outlines the right to inspect, maintain, adjust, repair or alter our mains. This includes carrying out any works incidental to any of those purposes. Service pipes are not our property and we have no record of them.

- Under Section 174 of the Act it is an offence to intentionally or negligently interfere with any resource main or water main that causes damage to or has an effect on its use or operation. It is in accordance with this statutory provision that we provide standard conditions to assist developers when working in close proximity to our water mains.

We recommend the developer contacts United Utilities for advice on identifying the exact location of the water mains.

Both during and post construction, there should be no additional load bearing capacity on the mains without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. The applicant should therefore give careful consideration to the implications of any changes in proposed land levels. Any such changes will need to be agreed with United Utilities.

Our standard conditions document includes details of trees and shrubbery suitable for planting in the vicinity of a water main. The applicant should consult this document to ensure their landscaping proposals meet with the advice provided in the document. We also recommend the use of root barriers to afford additional protection to the water mains within the site.

Public Sewers

Existing public sewers pass through the site and we will not permit building over them. We will require an access strip width in accordance with the minimum distances specified in '*Sewers for Adoption'*, for maintenance or replacement. This should be incorporated into any future site layout. Deep rooted shrubs and trees should not be planted in the vicinity of the public sewer and overflow systems.

Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.

For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:
Water assets – DeveloperServicesWater@uuplc.co.uk
Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities, please visit the Property Searches website https://www.unitedutilities.com/property-searches/. You can also view the plans for free. To make an appointment to view our sewer records at a local authority please contact them direct, alternatively appplicants can view the water and the sewer records at our Lingley Mere offices based in Warrington. Please ring 0370 751 0101 to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction, please contact a Building Control Body to discuss the matter further.

Abandoned Assets

The applicant should also note that we have records of abandoned assets within the site. We recommend the status of these assets are confirmed in liaison with United Utilities before

commencing development by using the above contact details for Developer Services.

Property Interests

It is possible that there are easements on the proposed development site, which are in addition to our statutory rights for inspection, maintenance and repair. If so, the easement will have restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the document, available from United Utilities Legal Services or Land Registry and to comply with the provisions stated within the document. Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipes or United Utilities legal right to 24 hour access.

The applicant should contact our Property Services team to discuss how the proposals affect our easements. They should contact PropertyGeneralEnquiries@uuplc.co.uk.

Should a planning application be submitted and approved at this site, the applicant should contact United Utilities regarding a potential water supply or connection to public sewers. Additional information is available on our website http://www.unitedutilities.com/builders-developers.aspx

If you have any questions with regards to this information, please feel free to contact me.

Yours faithfully

Gemma Gaskell
United Utilities
Developer Services and Metering

Standard Conditions for Works Adjacent to Pipelines

Document Ref. 90048

Issue 3.1 July 2015

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AMENDMENT SUMMARY

Amendment No. Date	Brief Description and Amending Action	Owner	Verifier
3.1 July 2015	'Easement Area' defined and legal clarifications made.	Neil Sixsmith	Jim Tresnan
3.0 March 2015	Full review and update	Neil Sixsmith	Jim Tresnan
2.0 May 2014	Full review and update. Appendix 1 incorporated to provide guidance on tree roots and planting. Improvements to document around vibration monitoring and discolouration	Peter Tucker	Nick Preston
1.2 October 2007	Alterations into Distribution Manual	Richard Duckett	
1.1 August 2007	Alteration to Guideline number 12	Paul Gough	Tony Conway
1 July 2003	First issue in standard format	Phil Hayden / Ian Skilling	Peter Womersley

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HISTORY OF THE DOCUMENT

The following table details the task team involved in the full review of the Standard Conditions:

Date and Issue Number	Task Team members
3.0 March 2015	Peter Tucker – UU Engineering Nick Preston – UU Engineering Jim Tresnan – UU Engineering Neil Sixsmith – UU Water Services (Network) Owen Newton - UU Engineering Mike Taylor – UU Water Services (Network)

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CONTENTS

AMENDMENT SUMMARY **2**

HISTORY OF THE DOCUMENT **2**

CONTENTS **3**

1. SCOPE **4**

2. DEFINITIONS **4**

3. GUIDELINES **5**

3.1. General Guidelines 5

4 ISSUES AFFECTING A PIPELINE DURING CONSTRUCTION ACTIVITIES **6**

4.1. Temporary Access 6

4.2. Temporary Fencing 7

4.3. Excavations within an Easement Area or Easement Width 7

4.4. Ground Vibration 8

5 ISSUES PERMANENTLY AFFECTING A PIPELINE OR EASEMENT **8**

5.1. Permanent Access 8

5.2. Permanent Fences and Boundaries 9

5.3. Installation of New Services within the Easement 9

5.4. Cathodic Protection of Pipelines 9

5.5 Mains Adjacent to Buildings in Streets 10

5.6. New Roads, Communal Parking and Driveways 10

6 PLANTING NEAR TO PIPELINES **10**

7 EASEMENT INFRINGEMENTS **11**

8 STOPPING UP ORDERS **12**

9 DRAWINGS **13**

Figure 1: Easement Widths for Single Pipes 13

Figure 2: Service Crossing Restrictions in relation to Pipeline Sockets 14

APPENDIX 1: PLANTING NEAR TO PIPELINES **15**

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1. SCOPE

This document sets out United Utilities Ltd (UU) standard conditions for work carried out over, under or adjacent to a UU Pipeline which can include multiple UU Pipelines laid adjacent to each other.

It is UU company policy not to allow any building over UU Pipelines or water mains. Any such building / structure would compromise UU's obligation to maintain a constant water supply and, in particular, would obstruct UU's ability to respond in the event of a failure of the Pipeline. Building over mains also has potential risks to the health and safety of anyone who might be affected by a failure, including the occupants of the building.

2. DEFINITIONS

Term	Definition
Pipeline	Means any aqueduct, trunk main, water distribution main, multiple pipes laid adjacent to each other or non-potable main vested in UU as water undertaker.
Easement Area	Means the easement specified in any relevant document, e.g. conveyance, transfer or deed of grant with such widths as specified therein.
Easement Width	Means the Easement Width for any Pipeline laid under statutory powers. For large diameter Pipelines, unless otherwise specified, the Easement Width shall extend 5 metres to each side of the Pipeline from its centreline (10 metres total width). For small single Pipelines of up to and including 300mm diameter, unless otherwise specified, the Easement Width shall extend 3 metres to each side of the Pipeline from its centreline (6 metres total width) Contact UU for specific Easement Width limits and conditions.
Street	The whole or part of any highway, any road, lane, footway, alley or passage, square or court, whether or not a thoroughfare. A Street can therefore be a footpath, cycle track, bridleway or full vehicular highway. Where a Street passes over a bridge or through a tunnel these are included as part of the Street.
PPV	Peak Particle Velocity
Shall or Must	Mandatory requirements are adopted through the use of 'shall' or 'must' or are otherwise specifically stated. The document also contains information and guidance that is not mandatory but is provided for consideration.
Stopping up Order	An order authorising the stopping up (removal of public rights of way) of any highway, if the Secretary of State is satisfied to do so, to allow development to be carried out in accordance to a valid and relevant planning permission granted under the Town and Country Planning Act 2008 as amended or re-enacted from time to time.
Promoter	Any utility company, self-lay organisation, developer, Highway Authority, Local Authority or any other organisation wishing to work adjacent to or cross over or under a UU Pipeline.

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3. GUIDELINES

3.1. General Guidelines

3.1.1. The Standard Conditions are issued for the guidance of Promoters and others to reduce the risk of damage to the Pipeline and the consequent liability for such damage. They do not replace or alter any powers or rights exercisable by, or protection afforded to UU by virtue of: -

a) Its ownership of the Pipeline or any rights or privileges in relation thereto;

b) Any conveyance, lease, deed or grant, easement (see Figure 1 Easement Widths), licence, wayleave or other legal document relating to the Pipeline;

c) Any statutory provision (including any provision in subordinate legislation) including but not limited to: -

i. The Water Industry Act 1991 as amended or re-enacted from time to time, will also apply.

ii. Any local statutory provision relating to a Pipeline and to any work of any other body or person which regulate, either generally or in relation to any specific crossing or work, the relations between UU and such other body or person, including any agreement or other document referred to in or incorporated with any such statutory provision.

In the event of any inconsistency between the provisions of these Standard Conditions and those of any document or statutory provision mentioned above, the latter shall prevail unless capable of variation by agreement and the substitution of the relevant provisions of these Standard Conditions is expressly agreed.

3.1.2. The Standard Conditions apply to all Pipeline(s). In the case of Pipeline(s) located in streets, the provisions of the New Roads and Street Works Act 1991 and the Traffic Management Act 2004, as amended or re-enacted from time to time, will also apply.

3.1.3. No work of any description shall take place on or within the Easement Area or Easement Width before full agreement has been reached with UU regarding the manner in which the work shall be carried out and consent to the same has been given in writing. At least 28 days' notice shall be given of any intention to carry out works in the Easement Area or Easement Width.

3.1.4. No vehicle, plant or machinery is to stand, operate or travel within the Easement Area or Easement Width of the Pipeline except as agreed by United Utilities.

3.1.5. UU reserves the right to supervise any work carried out on or within the Easement Area or Easement Width and to recover the costs incurred.

3.1.6. No buildings / structures of any description shall be erected within the Easement Area or the Easement Width.

3.1.7. No service shall cross the Pipeline at less than 1 metre in front of a socket face or at less than 300mm behind it. (See Figure 2)

3.1.8. No materials including spoil shall be placed on or stored within the Easement Area or Easement Width.

3.1.9. Access to and along the Easement Area or Easement Width shall be kept clear and unrestricted at all times. See Section 7, 'Easement Infringements'.

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3.1.10. Sanitary arrangements approved by UU shall be provided for persons working on or within the Easement Area or Easement Width. Precautions shall be taken to avoid spillage of fuels, oils, paints, solvents or any other substance, which may damage the Pipeline or its protection.

3.1.11. Where construction of a new structure / building is proposed within 1m of the edge of the Easement Area or Easement Width, its foundations shall be designed to ensure that load from the structure / building is not transferred onto the Pipeline. The design shall also ensure that UU has full access to the lowest point of the bedding of the Pipeline for maintenance or construction purposes

3.1.12. No alteration to the existing ground levels or surface use of the Easement Area or Easement Width shall be made without prior written consent from UU. At least 28 days notice shall also be given of any proposal to alter ground levels or the surface of land adjoining the Easement Area or Easement Width. This includes increasing the ground level above the Pipeline by placing material to form a landscaping bund or road (or other) embankment, as this has the potential to cause settlement to the Pipeline that could damage it.

3.1.13. Persons or their Promoters working on or within the Easement Area or Easement Width shall be required to indemnify UU for the full cost of any damage caused to its Pipelines and for any costs, charges and expenses resulting from these operations.

3.1.14. In an emergency, contact shall be made immediately using the following telephone number:

The UU Response Manager is available on-
07713887302 and this number shall be used for EMERGENCIES ONLY
e.g. if the UU Pipeline is damaged / burst the UU response Manager must be contacted immediately.

Please supply the UU Response Manager with the following information:

Who you are (name and company)?

What is your contact number?

Exactly where you are (in order to quickly identify which main is damaged and potential risks to UU)?

What is the damage?

Is it causing flooding?

Is flood water entering a watercourse?

4 ISSUES AFFECTING A PIPELINE DURING CONSTRUCTION ACTIVITIES

4.1. Temporary Access

4.1.1. Movement of vehicles and plant with a total weight exceeding 6 tonnes across the unprotected Pipeline is forbidden. The repetitive movement of vehicles or plant of any weight over the unprotected Pipeline in the same position is forbidden. Where temporary or permanent access is required, the Promoter must consult with UU prior to gaining access.

4.1.2. Each proposed temporary crossing point of a Pipeline shall be considered on an individual basis. The Promoter shall submit the design of the proposed crossing point

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to UU for acceptance. Work to construct the temporary crossing point shall not commence without prior written consent from UU.

4.1.3. The Promoter shall design any temporary crossing point such that the load from any vehicle or any item of construction plant that will use the crossing point creates a suitably factored bearing pressure of not more than 8.5kN/m2 at the crown of the UU Pipeline. (N.B. *This load is approximately equivalent to the loading on a Pipeline with 900mm of cover when a 6 tonne excavator crosses above it.*) In order to achieve this, the Promoter may use substantial timber baulks, reinforced concrete slabs or proprietary ground protection systems (e.g. Eve Trakway). Where it is not possible to distribute the surcharge load from the plant to less than 8.5kN/m2 at the crown of the Pipeline, then the design of the temporary crossing point shall consist of a suspended crossing which bridges over the Pipeline.

4.1.4. Temporary crossing points shall only be used to allow vehicles and plant to traverse across a Pipeline. Temporary crossing points are not to be used as working platforms for construction plant. Plant shall not be allowed to operate above a UU Pipeline unless specific written consent is given by UU. Any request by a Promoter for them to site working plant above a UU Pipeline must demonstrate that the platform which their plant is to be sited on has been designed as a working platform and will ensure that the maximum surcharge load from that plant is distributed to less than 8.5kN/m2 at the crown of the Pipeline, or bridges over the Pipeline.

4.1.5. All parts of a temporary crossing point must be removed when the work is complete, unless written consent is obtained from UU for the crossing to be left in place. The design and construction of the temporary crossing point shall be such that it permits for its removal (and the reinstatement of the ground beneath it) without exposing the Pipeline to undue loading, vibration or risk.

4.2. Temporary Fencing

4.2.1. Fencing shall be erected by the Promoter when they are working in and around the Easement Area or the Easement Width to demarcate its location, to regulate vehicle movements and to confine the crossing of the Pipeline only to approved crossing points. The fencing shall be of substantial construction. It shall be adequately maintained at all times to the satisfaction of United Utilities.

4.3. Excavations within an Easement Area or Easement Width

4.3.1. Prior to general excavation, trial holes shall be dug by hand to determine the precise location of the Pipeline. UU reserves the right to carry out such excavations. The cost of all such excavations shall be borne by the Promoter.

4.3.2. Excavations shall be fully supported and shall be backfilled to the satisfaction of UU. All work shall be carried out during normal working hours, which shall have been previously agreed with UU. UU reserves the right to stop all work on or within the Easement Area or Easement Width which, in the opinion of its officers, places the Pipeline at risk. As a consequence of such action, UU shall not accept any claims for financial loss.

4.3.3. All excavations within the Easement Area or Easement Width shall be carried out by hand or may be carried out by mechanical excavator if under the supervision of UU personnel. Excavation within 1 metre of the Pipeline(s) must be carried out by hand and great care must be exercised to ensure that any protective wrapping is not damaged.

4.3.4. If a thrust block is discovered within any excavation adjacent to a Pipeline(s), then work shall be stopped and the excavation backfilled as soon as possible.

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4.4. Ground Vibration

4.4.1. No blasting shall be carried out within 300 metres of the Pipeline(s) without prior written consent from UU, unless it can be demonstrated that ground vibration from such activities shall not exceed a peak particle velocity (PPV) of 5mm/s in any plane at the closest point of the Pipeline(s) to the blast.

4.4.2. Demolition, piling, tunneling or any other construction technique which induces significant vibration (not exceeding a peak particle velocity of 5mm/s) shall be permitted up to 10 metres away from the Pipeline(s). Permission will be granted by UU provided that the Promoter has accurately established the position of the Pipeline(s) and this has been verified by UU and a written statement of the precautions to be taken to ensure the safety of the Pipeline(s) has been submitted by the Promoter and received and consented to by UU prior to works being undertaken.

4.4.3. Should demolition, piling, tunneling or any other construction technique which induces significant vibration be proposed within 3.5 - 10 metres of the Pipeline(s) this shall be subject to seismic monitoring in order to prevent damage to the Pipeline(s). The Promoter shall accurately establish the position of the Pipeline(s). Seismograph readings shall be taken by the Promoter's specialist organisation on the line of the Pipeline at locations to be agreed with UU. Vibration monitoring shall be done under the supervision of a specialist organisation which has significant experience of similar monitoring work. The identity of the specialist organisation shall be proposed by the Promoter and approved by UU. This approval should not be unreasonably withheld or delayed. The cost of the seismic monitoring shall be borne by the Promoter. Vibration shall be measured in terms of peak particle velocity (PPV) and the Promoter shall employ suitable methods of construction in carrying out its works such that the PPV does not exceed 5mm/s. If the measured PPV does exceed 5mm/s then work shall cease immediately and a review of the monitoring data shall be undertaken between the Promoter and UU Engineering staff. If necessary UU shall notify the Promoter of any reasonable mitigation measures to protect the Pipeline(s) that it requires the Promoter to carry out. The Promoter shall comply with these reasonable mitigation measures in carrying out its works. A written statement of the precautions to be taken to ensure the safety of the Pipeline(s) shall be submitted by the Promoter and received and approved by UU prior to works being undertaken.

4.4.4. If UU identify that there is a risk of discolouration of the potable water supply the Promoter shall not excavate within 1m of the Pipeline(s) in any plane. Given the fact that there shall be significant excavation by hand, it may be more economical for the Promoter to consider directional drilling or another form of trenchless technique. UU would prefer this as an alternative construction technique.

4.4.5. Where practical, and when requested by UU due to the risk of discolouration, downstream turbidity monitoring should be undertaken for potable water Pipelines irrespective of Pipeline diameter. If UU reports to the Promoter that the turbidity levels measured in the main are very close to or exceeding the regulatory standards then work shall cease immediately and a review of the monitoring data shall be undertaken between the Promoter and UU Engineering staff. If necessary UU shall notify the Promoter of any reasonable mitigation measures to protect the Pipeline(s) that it requires the Promoter to carry out. The Promoter shall comply with these reasonable mitigation measures in carrying out its works.

5 ISSUES PERMANENTLY AFFECTING A PIPELINE OR EASEMENT

5.1. Permanent Access

5.1.1. Any proposed crossing of the Pipeline shall be considered on an individual basis. Any permanent access crossing the Easement Area or Easement Width shall be designed

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and constructed by the Promoter to prevent any damage to the Pipeline. This may typically consist of mass concrete filled trenches constructed on either side of the Pipeline(s) with reinforced concrete slabs spanning between them. The Promoter shall submit the design of the proposed crossing point to UU for acceptance. Work to construct the permanent crossing point shall not commence without prior express written consent from UU.

5.2. Permanent Fences and Boundaries

5.2.1. Fences or other boundaries structures crossing the Easement Area or Easement Width shall be as near as possible perpendicular to the line of Pipeline and in no case shall be made at an angle of less than 45 degrees. Proposals for any new fences or other boundary structures shall be submitted to UU for approval. Where necessary a lockable gate shall be provided for UU for their sole use.

5.3. Installation of New Services within the Easement

5.3.1. Any pipes, drains, electricity cables or sewers crossing unmade ground over or under the Pipeline shall be laid in steel conduit or ductile iron pipe ideally unjointed (or similar UU approved material) and adequately supported so as to be self-supporting over any subsequent excavation which may have to be carried out i.e. they should extend well into the undisturbed ground at each side of the Pipeline trench and shall cross as near as possible to 90 degrees to the Pipeline.

5.3.2. In no case shall any crossing be made at an angle of less than 45 degrees.

5.3.3. Provided that ground conditions are suitable, pipes crossing below the Pipeline shall be constructed by an approved tunneling method, and agreed by UU. The Promoter shall demonstrate that the predicted - and actual - ground settlement at the level of the invert of the Pipeline as a result of their pipes crossing below the Pipeline is not more than 20mm.

5.3.4. For UU Pipelines up to and including 300mm diameter, any pipes drains, electricity cables or sewers laid adjacent to the Pipeline must have a minimum clearance of 300mm from it. For UU potable water Pipelines over 300mm diameter (or for smaller diameter Pipelines where UU network operations have highlighted a risk of discoloration), there shall be a clearance between the pipes, drains, electricity cables or sewers and the Pipeline that is greater than or equal to the diameter of the Pipeline (ideally at least 1m clearance if possible to reduce the risk of discoloration). These clearances shall apply to crossings above or below the Pipeline, and include pipes, drains, electricity cables or sewers laid adjacent to the Pipeline.

5.3.5. The Promoter shall exercise suitable care when selecting and placing backfill material for any excavation dug within the Pipeline Easement to ensure that it is adequately compacted, provides sufficient support to the Pipeline and will not cause damage to the Pipeline. Reference should be made to the current version of 'Civil Engineering Specification for the Water Industry' (CESWI).

5.4. Cathodic Protection of Pipelines

5.4.1. Where cathodic protection is proposed for the Promoter's works, or where it exists in connection with UU's Pipeline, the Promoter shall take all necessary steps to ensure that the integrity of the system is maintained during the construction of the works. Where cathodic protection exists on UU's Pipeline, or is to be installed by the Promoter on his apparatus, interference tests shall be carried out on completion of the works at the Promoter's expense. Where such tests indicate that UU's Pipeline may be at risk, then the Promoter, at his own expense, must install suitable remedial measures, to be agreed by UU. UU must be consulted in the case of installation of electric tramways over Pipelines.

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5.5 Mains Adjacent to Buildings in Streets

5.5.1 Water mains may be laid in a Street or an Easement Area
Sometimes this is immediately adjacent to a building. In the case of an Easement Area, new buildings and their foundations may not be built within 2.5m of an existing water main (5m for mains > 300mm). This is to facilitate repair and maintenance.

5.6. New Roads, Communal Parking and Driveways

No alteration to the surface use of the Easement Area or Easement Width for the purpose of constructing a road, communal parking or private driveways (except for vehicular crossings at >45degrees) shall be made without prior written consent being obtained from UU.

6 PLANTING NEAR TO PIPELINES

6.1 Written consent must be obtained from UU before any tree or shrub planting is carried out. Any consent is subject to UU retaining the right to remove, at any time, all trees or shrubs that in its opinion becomes a danger or nuisance to the pipeline or asset.

6.2 Selection and planting of tree species should be in accordance with BS8545:2014 Trees: from nursery to independence in the landscape. Recommendation.

6.3 Planting of shallow rooted hedge plants, domestic soft fruiting bushes and ornamental shrubs shall be permitted however these shall not be permitted to develop as shrub trees and shall be maintained by the Promoter / Owner to a maximum height of 1.5m.

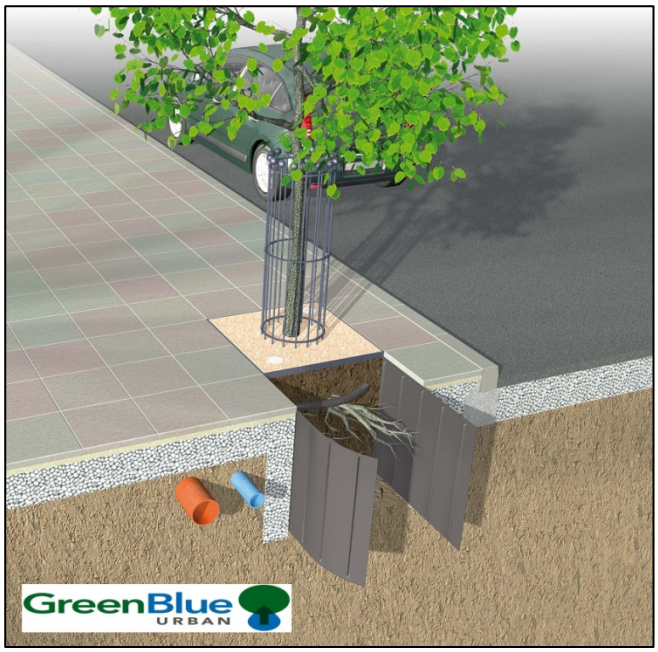
6.4 There shall be strictly no planting of Poplus ssp. or Salix ssp. within 10 metres of a Pipeline.

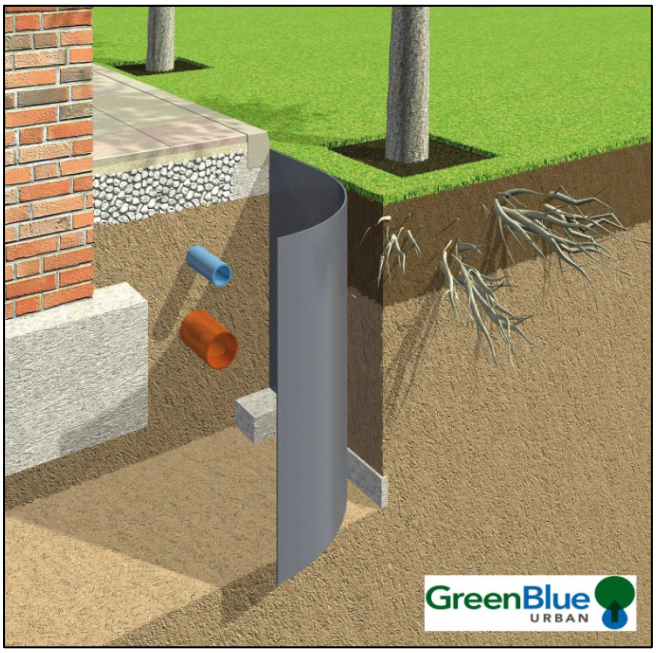
6.5 Restrictions apply to all Easement Areas and Easement Widths see Appendix 1 for details. This includes a non-exhaustive list of trees and recommended planting distances.



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6.6 United Utilities will consider the provision of specific tree root barriers where there is a need to establish trees closer to Pipeline(s) than would normally be acceptable best practice. Vertical or horizontal barriers can be effective and acceptable so long as they are professionally specified and installed following manufacturer's instructions and a suitable distance from the tree trunk to ensure tree stability at maturity. See the figures below for typical examples of these methods. These barriers shall be 1 – 2mm thick semi rigid type and be fitted by either a specialist installer or by very closely following the manufacturer's guidance. Further advice about root barriers can be found in BS8545.





Images supplied by GreenBlue Urban

6.7 A useful publication that can assist with planting near to utilities is *"NJUG Guidelines for the Planting, Installation and Maintenance of Utility Apparatus in Proximity to Trees"*

7 EASEMENT INFRINGEMENTS

7.1 UU acknowledges that there are situations where structures have been erected either directly above the Pipeline, or within an Easement Area or Easement Width. These encroachments should be assessed and recorded and appropriate actions taken. The assessment shall consider the potential risks to both UU's asset and the structure upon it.

7.2 The options available to UU are:-

a) Notify owner of risks

b) Notify owner and consider mains diversion at owners cost with any required legal documentation to entered into

c) UU may take legal action to obtain a court order to instruct removal of the structure at the owners cost.

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The key factors to be considered when selecting one of these options are:-

a) Security of supply

b) Health and safety

c) Cost benefit

d) Company reputation

e) Probability of Pipeline failure and likely consequences. These will vary with the Pipeline material, diameter, depth below foundation, ground conditions and the operating regime of the Pipeline

7.3 The notification given to the owner of the building shall state that, notwithstanding our Statutory Rights and those contained in any deed, UU shall not be liable for any costs whatsoever if damage is occasioned to the structure whilst carrying out our works.

7.4 In the case of structures of a temporary or easily removable character consent to such structures may after consideration be given by UU strictly on a case by case basis and the decision of UU being final. UU's access to any Easement Area or Easement Width should not be obstructed or impeded in any way

8 STOPPING UP ORDERS

8.1 UU has no objection to a Stopping up Order, provided that access remains for repair and maintenance of the network within the area affected.

8.2 If the proposed development will impede clear access, then the water main must be abandoned or diverted at the applicants cost.

8.3 Typically, there would be no objection if the water main remains within a Street to which there is vehicular access sufficient for UU to perform its statutory duties. It is not necessarily a problem if the Street is within a gated enclosure, e.g. alley gates are not a problem.

8.4 If the main does not remain within a Street, the developer must provide an easement according to UU standard conditions. Detailed information is available from the United Utilities Website

8.5 The following is specifically not permitted in relation to easements.

a) Any alteration to ground level which leaves the water main at a depth less than 900mm (750mm for PE pipes), or more than 1200mm.

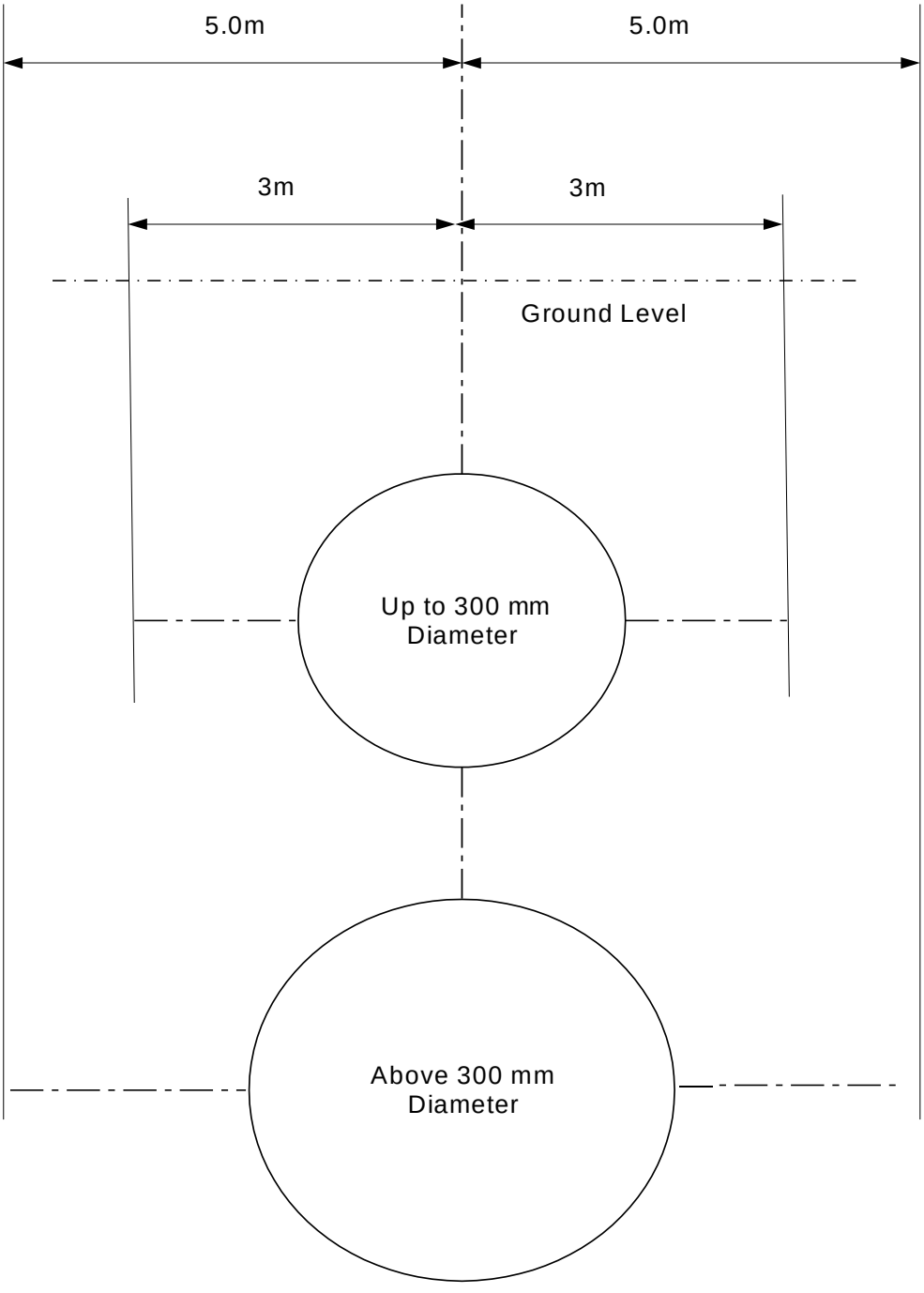
b) Any building over the main, or within the Easement Area or Easement Width, such that an excavation of the main would threaten the stability of the building.

c) Planting of large trees (detailed information available in Appendix 1). This shows the distances that various trees and shrubs can be planted away from Pipelines and water mains. Root barriers can be used when planting closer to the mains; however trees root barriers need to be deep enough to stop roots from penetrating under the barrier.

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9 DRAWINGS

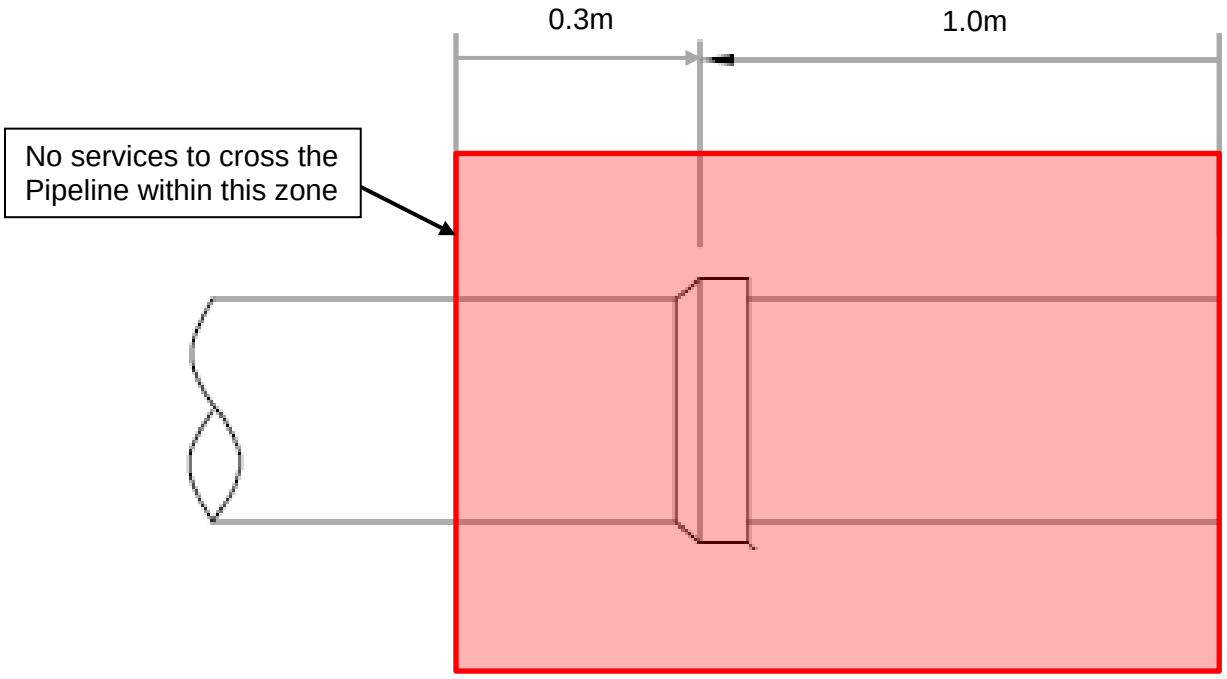
Figure 1: Easement Widths for Single Pipes



Note: This sketch is issued for guidance only (not to scale)

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Figure 2: Service Crossing Restrictions in relation to Pipeline Sockets



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APPENDIX 1: PLANTING NEAR TO PIPELINES

Latin Name	Common Name	Tree or shrub planting maintained as hedge (no higher than 1.5m height)	Individual trees planted from 3 metres of underground asset or pipe	Individual trees planted from 6 metres of underground asset or pipe	Group trees planted from 10 metres of underground asset or pipe
Acer campestre	Field Maple	Yes	Yes	Yes	Yes
Aesculus hippocastanum	Horse chestnut	✗	✗	✗	Yes
Carpinus betulus	Hornbeam	Yes	✗	✗	Yes
Castanea sativa	Sweet Chestnut	✗	✗	✗	Yes
Corylus avellana	Hazel	Yes	Yes	Yes	Yes
Crateagus monogyna	Hawthorn	Yes	Yes	Yes	Yes
Fagus sylvatica	Beech	Yes	✗	✗	Yes
Ilex aquifolium	Holly	Yes	Yes	Yes	Yes
Larix decidua	Larch	✗	✗	✗	Yes
Ligustrum vulgare	Privet	Yes	Yes	Yes	Yes
Malus domestica	Apple	✗	Yes	Yes	Yes
Malus sylvestris	Crab Apple	✗	Yes	Yes	Yes
Pinus nigra	Black pine	✗	✗	✗	Yes
Pinus sylvatica	Scots Pine	✗	✗	✗	Yes
Platanus acerifolia	London Plane	✗	✗	✗	Yes
Prunus avium	Wild Cherry	✗	Yes	Yes	Yes
Prunus cerasifera	Plum	✗	Yes	Yes	Yes
Prunus lusitanica	Laurel	Yes	Yes	Yes	Yes
Prunus padus	Bird Cherry	✗	Yes	Yes	Yes
Prunus spinosa	Blackthorn	Yes	Yes	Yes	Yes
Pyrus communis	Pear	✗	Yes	Yes	Yes

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Latin Name	Common Name	Tree or shrub planting maintained as hedge (no higher than 1.5m height)	Individual trees planted from 3 metres of underground asset or pipe	Individual trees planted from 6 metres of underground asset or pipe	Group trees planted from 10 metres of underground asset or pipe
Sambucus nigra	**Elder**	**Yes**	**Yes**	**Yes**	**Yes**
Sorbus aria	**Whitebeam**	**✕**	**✕**	**✕**	**Yes**
Sorbus aucuparia	**Rowan**	**✕**	**✕**	**Yes**	**Yes**
Taxus baccata	**Yew**	**Yes**	**✕**	**✕**	**Yes**
Tilia cordata	**Lime**	**✕**	**✕**	**✕**	**Yes**
Ulmus glabra	**Wych Elm**	**✕**	**✕**	**Yes**	**Yes**

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