



TOWN AND COUNTRY PLANNING ACT 1990

**APPEALS BY:
TAYLOR WIMPEY UK LTD &
HOMES ENGLAND**

**PICKERING'S FARM SITE, FLAG LANE,
PENWORTHAM, LANCASHIRE PR1 9TP**

**DESIGN PROOF OF EVIDENCE OF:
DR DARREN PRICE BA(Hons) BArch DCE**

20TH JULY 2022

INSPECTORATE AND LPA REFERENCES:

APPEAL A

REF: APP/F2360/W/22/3295498

LPA REF: 07/202100886/ORM

APPEAL B

REF: APP/F2360/W/22/3295502

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1.0 Introduction and scope of evidence

- 1.1 My name is Dr Darren Price. I have a Bachelor of Arts Degree in Architecture (equivalent to RIBA part one), a BArch Postgraduate Degree in Architecture (equivalent to RIBA part two) both gained in Manchester and a PhD gained at the Department of Urban Studies and Planning at the University of Sheffield.

- 1.2 I have worked in the built environment in various capacities for over twenty years, including a period as the Architecture and Urban Design Advisor for North Staffordshire, a post funded by Advantage West Midlands, the Regional Development Agency. In that role I managed a nationally recognised design review service, with a panel Chaired by the eminent architect Ted Cullinan CBE RA FRIBA and winner of the 2008 RIBA Gold Medal. Our panel comprised a range of senior professionals, we reviewed over two hundred significant proposals and provided a design advice and enabling service for a number of local authorities and other public bodies, including Housing Market Renewal Pathfinders, Building Schools for the Future and Primary Care Trusts.

- 1.3 Since 2011 I have worked in a private consultancy role, both under my own name and as Place ART, advising developers as well as local authorities and community groups. In this capacity I have undertaken a variety of design quality assessments for proposals of various scales, including Garden Villages and have advised on the development of masterplans and strategic and detailed design codes. I have also acted as an expert design witness in a number of Planning Inquiries including complex hybrid appeals.

- 1.4 Having worked with the Commission for Architecture and the Built Environment (CABE) previously, I was a Design Council CABE Built Environment Expert from 2012 to 2021 and have been an Associate

Design Council Expert since then. I have worked on a number of projects in that capacity, not least as a Built For Life Examiner tasked with benchmarking and maintaining the integrity of the Building For Life assessment. Prior to this I was one of the national panel of Accredited Building For Life 20 Assessors and have delivered training on this tool to a variety of audiences over a number of years.

- 1.5 In May 2022, I was asked by South Ribble Borough Council if I would give evidence on design matters in support of the Council's reasons for refusal for the two refused applications under consideration here. I have no previous experience of working with the Council and I had not previously advised them on any of the applications relating to this Inquiry. Having visited the site, reviewed the application documents, officers' reports, Statements of Case and other relevant documents, I confirmed that I supported the design objections raised by the Council and, in May 2022, I was instructed to produce this Proof of Evidence.
- 1.6 I have examined each of the Full Planning Applications relating to this combined inquiry, 07/202100886/ORM (Appeal A application) and 07/202100887/ORM (Appeal B application) both refused permission on 30th November 2021. This includes the wide range of supporting documentation submitted by the applicant in both cases. In addition to this, I have examined all relevant policy documents from the national to the local level. After consideration of all of the above information, I have undertaken an assessment of the masterplan and design elements of the proposals, as contained in Section 3.0 of this report.
- 1.7 The specific Reason for Refusal that I am addressing here is the same for both appeals, it reads:

Appeal A and B: Reason 5 (CD ??.)

“Policy C1 of the South Ribble Local Plan requires an agreed masterplan and design code for the comprehensive development of the site. The masterplan has not been formally agreed by South Ribble Council and the version submitted with the two applications does not meet the policy requirements”.

This Proof sets out how the submitted masterplan and associated design code are not suitable to deliver a comprehensive approach in light of local and national policies for housing and design.

- 1.8 Every effort has been made to limit the scope of this evidence to design matters, with highways matters being dealt with by Mr Stevens, viability issues by Mr Lloyd and planning matters by Mr Wood. However, inevitably there are areas where the evidence overlaps and where this occurs I have made it clear and explained why this is covered in this proof.
- 1.9 The evidence that I have provided in this Proof has been prepared with the benefit of my professional training and experience, as described above, and I confirm that the opinions expressed herein are my true and professional opinions.

2.0 Planning Policy

2.1 The planning policy context is provided by the National Planning Policy Framework (NPPF, CD 4.1), the Central Lancashire Core Strategy (CLCS CD 5.1), the South Ribble Local Plan (SRLP, CD 5.2) and the Penwortham Town Neighbourhood Plan (PTNP, CD 5.6). It is also informed by the The National Design Guide (NDG, CD 10.15), The National Model Design Code (NMDC, CD 10.16), Building for a Healthy Life (BHL 10.17) and the Central Lancashire Design Guide (CLDG CD 6.4).

2.2 National Planning Policy Framework

Paragraph 73 discusses the supply of new housing through the planning process and states that when sites are identified they should:

“c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;”

Paragraph 126 states that

“The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve”.

Paragraph 130 states that:

“Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;*
- f) *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 users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Paragraph 134 states that:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design^[1], taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) *outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*

2.3 National Design Guide

The National Design Guide (CD 10.15) further explains the ideas set out in the NPPF and sets out ten characteristics of well-designed places. Whilst all are important, of particular relevance to these appeals are:

Characteristic One: Context

Context is the location of the development and the attributes of its immediate, local and regional surroundings...

Well-designed places are:

- *based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*
- *responsive to local history, culture and heritage.*

¹ NPPF Footnote 52 states: “Contained in the National Design Guide and National Model Design Code.”

Characteristic Two: Identity

The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them...

Well-designed buildings and places:

- *have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;*
- *have a character that suits the context, its history, how we live today and how we are likely to live in the future; and*
- *are visually attractive, to delight their occupants and other users.*

2.4 National Model Design Code

The National Model Design Code (NMDC, CD 10.16) supplements the National Design Guide and provides detailed guidance on the production of design codes.

2.5 Building For a Healthy Life

Building for a Healthy Life (BHL, CD 10.17) is the latest iteration of the long established Building For Life tool, an industry standard method of assessing the quality of new developments. The 12 objectives set out in BHL form the basis for the analysis undertaken in this Proof of Evidence.

2.6 The Central Lancashire Core Strategy

The Core Strategy (CLCS, CD 5.1) highlights the importance of design in a variety of ways including:

Policy 17: Design of New Buildings

“The design of new buildings will be expected to take account of the character and appearance of the local area, including the following:

(a) siting, layout, massing, scale, design, materials, building to plot ratio and landscaping.

(b) safeguarding and enhancing the built and historic environment.

I being sympathetic to surrounding land uses, occupiers and avoiding demonstrable harm to the amenities of the local area.

(d) ensuring that the amenities of occupiers of the new development will not be adversely affected by neighbouring uses and vice versa.

(e) linking in with surrounding movement patterns and not prejudicing the development of neighbouring land, including the creation of landlocked sites.

(f) minimising opportunity for crime, and maximising natural surveillance.

(g) providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, habitat creation, providing open space, and enhancing the public realm.

(h) including public art in appropriate circumstances.

(i) demonstrating, through the Design and Access Statement, the appropriateness of the proposal.

(j) making provision for the needs of special groups in the community such as the elderly and those with disabilities.

(k) promoting designs that will be adaptable to climate change, and adopting principles of sustainable construction including Sustainable Drainage Systems (SuDS); and

(l) achieving Building for Life rating of ‘Silver’ or ‘Gold’ for new residential developments.

(m) ensuring that contaminated land, land stability and other risks associated with coal mining are considered and, where necessary, addressed through appropriate remediation and mitigation measures.
Central Lancashire Local”

2.7 The South Ribble Local Plan Adopted July 2015

Pickering’s Farm is identified as the largest of three major sites for residential-led development in the SRLP (CD 5.2) and is supported by:

Policy C1 – Pickering’s Farm, Penwortham

“Planning permission will only be granted for the development of the Pickering’s Farm site subject to the submission of:

a) an agreed Masterplan for the comprehensive development of the site. The Masterplan must include the wider area of the Pickering’s Farm site which includes the safeguarded land which extends to Coote Lane as shown on the Policies Map, and make provision for a range of land uses to include residential, employment and commercial uses, Green Infrastructure and community facilities.

b) A phasing and infrastructure delivery schedule

c) An agreed programme of implementation in accordance with the Masterplan and agreed design code.”

Policy G10 Green Infrastructure in Residential Developments

This policy seeks to ensure that there is Green Infrastructure provision in residential developments (of 5 dwellings or more). Standards are set out for different typologies of Green Infrastructure.

Policy G17 – Design Criteria for New Development

Design criteria for new development are set out to help protect the local character and distinctiveness of the borough, encouraging community identity and a sense of pride within areas. The policy seeks to ensure that:

- a) Development proposals do not have a negative impact on existing and neighbouring buildings and the street scene*
- b) Layout, design and landscaping are of a high quality, respecting the character of the site and the local area*
- c) Highway and pedestrian safety and the free flow of traffic would not be prejudiced*
- d) Heritage assets and the historic environment are appropriately addressed*
- e) There are no detrimental impacts on landscape features.”*

2.8 Penwortham Town Neighbourhood Plan 2016

Although much of the site lies outside of the scope of the PTNP (CD 5.6), the Pickering’s Farm is referred to and the following policy is relevant:

*“Policy 2: Requirements for new large-scale residential development
The phased delivery of allocated large-scale residential sites, such that each phase has a distinctive character of its own, will be supported.”*

2.9 Central Lancashire Design Guide 2012

The Central Lancashire Design Guide (CLDG CD 6.4) is a Supplementary Planning Document that covers Chorley Council, Preston City Council and South Ribble Borough Council.

3.0 The Masterplan Context

- 3.1 Prior to the assessment of the masterplan and associated design code, it is useful to provide a summary of its history to provide some context. This begins with the reason why a masterplan is required and moves on to how this progressed and developed prior to the submission of the applications being considered here, including the consideration by the South Ribble Borough Council Planning Committee.
- 3.2 There is no dispute surrounding the suitability of the appeals sites for residential development given that they form part of an allocated 'Major Site for Development' in the SRLP (CD 5.2). However, development of the Pickering's Farm allocated site is only considered to be acceptable (and sustainable) if a comprehensive master plan approach is adopted and piecemeal development is avoided. This is expressly recognised within the terms of Policy C1 in the SRLP (CD, 5.2 p.25) which clearly requires *"an agreed masterplan for the comprehensive development of the site."*
- 3.2 The reasons for this firm commitment to a comprehensive approach are clear and are outlined in the Justification of Policy C1 in the SLPR (paras 6.17-6.24, pp27-28 CD 5.2). Essentially, this is a large and complex site with many issues to address which impinge upon each other. As a result, a comprehensive masterplan, supported by a robust design code, is needed to ensure that all these issues can be resolved and prove deliverability of the vision for the whole of the Pickering's Farm allocation site. It is essential that this is completed to avoid the piecemeal development of the site and to ensure all subsequent Reserved Matters applications follow a coherent framework.
- 3.3 The Appellants accepted this requirement and following a period of dialogue with the LPA submitted a masterplan for consideration by the

SRBC Planning committee in September 2020. This masterplan was unanimously rejected by the Committee, which resolved: (Appendix 1):

“That the Pickerings Farm Masterplan, Design Code and Infrastructure Delivery Schedule as submitted by Taylor Wimpey and Homes England be refused as a result of concerns regarding highways; green infrastructure; ecology; drainage provisions; impact on air quality; lack of appropriate and necessary infrastructure; inappropriate mix of housing; and the impact on the residential amenity of the wider community.”

These reasons were further explained in the letter from SRBC dated 21/09/20 (Appendix 2) and a number of amendments were made. The masterplan was not resubmitted.

- 3.4 In their Statement of Case the Appellants state that they have produced a *“comprehensive masterplan”* (CD 10.2, Para 3.2, p.6) but also acknowledge that this has not been agreed by the Local Planning Authority - despite the clear requirement for it to be so. The policy requirement to agree a masterplan will be dealt with by Mr Wood in his planning evidence and I address the two appeal schemes along with the submitted masterplan and design code and analyse these on their own merits. I will also highlight where I consider that a less than comprehensive approach has been undertaken and in turn, how the proposals do not comply with Policy C1 (p27 CD 5.2) and ultimately, how this creates the risk of significant harm.

4.0 Masterplan and Design Code Assessment

4.0.1 In order to assess the masterplan and design code and how this has been developed and adapted through the outline applications, I have used the established Building for a Healthy Life (BHL) 12 objectives (see CD 10.17) to act as a framework for analysis. The use of BHL and its predecessor Building For Life is embedded in the SLCS (Policy 17 p104, CD 5.1) and throughout the Central Lancashire Design Guide SPD (CD 6.4). These 12 objectives highlight key urban design issues, provide a list of criteria by which the masterplan and code can be assessed and as a result they form the sub-headings of the following 12 sections of this proof.

4.0.6 It is important to note that as the appeal is considering outline applications, there is not sufficient detailed design information to address some of the BHL objectives fully at this stage. Whilst it is expected that this detail will be added through the multiple Reserved Matters applications that will follow, I have produced an assessment of what guidance can, and should, be included in the masterplan and supporting design code to deliver the vision for the Pickering's Farm allocated site. This includes highlighting where this is considered to be deficient resulting in a less than comprehensive approach.

4.1 Natural connections

4.1.1 This site has the opportunity to make successful connections beyond to the existing settlements to the north and east, although the latter is considerably more problematic as a result of the West Coast Mainline which forms the eastern boundary. There are two existing bridges that cross the railway, a two-way bridge at Bee Lane to the north with no pedestrian footways and a single carriageway bridge at Flagg Lane with

dual pavements. There is also an attractive network of narrow lanes within the site boundaries that serve a variety of existing properties which are predominantly individual dwellings set in large plots. How these connections would operate with regard to movement will be dealt with in detail by Mr Stevens in his Highways Proof, so I will limit my comments to the urban design and placemaking impacts of the proposed strategy.

4.1.2 The decision taken to adopt a 'vision and validate' approach and the hierarchy for travel choice that prioritises pedestrian and cycle movements (p.22 Masterplan, CD 1.16) is appreciated, but there are concerns over the potential implementation of this and how the masterplan and design code can deliver the aspiration. Again, Mr Stevens will address the technical aspects of this in his Proof and so for me, the key consideration is the quality of these connections, both external to the wider area and internally within the site. I will deal with the external vehicular connections first.

4.1.3 The main vehicular access is from the A582 Penwortham Way to the western edge of the site, and this is considered to be a suitable location, especially considering the likely future upgrading of this highway. The proposed signalised junction here effectively acts as the main entrance gateway to the whole development and is identified as such on the illustrative masterplan (CD 1.6). The design of this area is therefore vital as it will form the first impression of the development for most visitors. As such the design development of the illustrative masterplan included in the DAS (CD 1.17, p.34-35) is useful, but this would have benefitted from some visualisations to explore how this important gateway will function and appear to visitors. The Design Code (DAS, CD 1.17) adds some additional detail in terms of materials and

precedent images, although without the support of a detailed context study² the justification for these is unclear.

4.1.4 The outline applications considered here cover only a part of the wider masterplan area and the external connections available to the two appeal sites are severely limited as a result. The most obvious of these limitations is due to the incomplete spine road which terminates abruptly, effectively creating a large cul-de-sac. This effectively means that almost all vehicles will enter and leave via the Penwortham Way gateway. At least they will be *supposed* to enter and leave the site via this route, as the existing network of Lanes will remain in place, ostensibly for the use of the current residents only, with a 'Through Traffic Only' sign to prevent anyone from using these (p.44 DAS, CD 1.17).

4.1.5 For example, it is not clear what would prevent a motorist entering from the A582 and using the network of existing Lanes (via Moss Lane, or any of the secondary streets off the main spine road and turning right onto Bee Lane) to navigate through the site to get to Lostock Hall and beyond. Of course, the same could happen in reverse, with cars entering the site via the Bee Lane or Flagg Lane bridges and navigating their way via the Lanes to the spine road and the A582 beyond. Whilst it is indicated that the Lanes would only be for use by vehicles associated with the existing houses and businesses that use them now, only 'Through Traffic Only' signs prevent others from doing so and it is suggested that these are likely to have limited effectiveness. The impact of the creation of such 'rat runs' is clearly to the detriment of the quality of the space and undermines the cycling and pedestrian focus that underpins the masterplan.

2. See Section 3.6 for further discussion on this.

- 4.1.6 The lack of an east-west through route (i.e. CBLR) creates a number of different urban design problems across the extent of the Appeal sites that will be addressed in the subsequent sections of this Proof.
- 4.1.7 The likely urban design impacts of the non-completion of the Cross Borough Link Road are important (especially as the proposals for Appeals A and B do not indicate how this will be completed) but potential issues associated with use of the Lanes exist whatever the position with delivery of the CBLR. This is because it is suggested that only existing residents will use the existing Lanes for vehicles. Again, aside from the use of 'Through Traffic Only' signs it is unclear how this is proposed to be enforced. Any technical highways issues in respect of that approach will be covered in Mr Stevens Highways Proof, but I note that there will be a significant risk to the quality of the pedestrian and cycle routes across the application sites should the use of the Lanes for vehicles remain a possibility (e.g. in the vicinity of the proposed Primary School during drop-off and pick-up times).
- 4.1.8 With regard to walking and cycling connections, these too are problematic as a result of the lack of the CBLR and the potential use of the Lanes by more vehicles, as discussed above. There are some positive aspects though, with links beyond the red line and new connections to the north onto Kingsfold Drive and these are welcomed. However, the connection to the east cited in the DAS along The Cawsey to Old Tram Road and the car-free cycle or walking route into Preston (p.42, DAS, CD 1.17) would require negotiating the narrow Bee Lane bridge, which has neither pedestrian footways or cycle lanes, and the appeal proposals provide no readily noticeable indication of how this would be improved. This would reduce the effectiveness of this connection and reduce its likely use.

4.1.9 Overall, there are significant concerns over the wider connectivity of both Appeal A and B until such a time as the CBLR has been completed. These concerns are exacerbated by the lack of any indication about how and when this, and other vital links like the improvements to the Bee Lane Bridge, will be delivered. Without this strong east-west connection there is a risk of significant harms created by the only part realised and compromised masterplan. The ‘comprehensive approach’ as set out in Policy C1 of the SRLP (CD 5.2) has not been followed.

4.2 Walking, cycling and public transport

4.2.1 The issues of walking and cycling, subject to the resolution of the identified issues discussed above, are both potentially strong elements of the wider masterplan proposals. The Lanes, if they can be kept largely car-free, are attractive walking and cycling routes and the retention of existing hedgerows and trees, keeping these within the public realm where they can be safeguarded and maintained, is welcomed. Other Public Rights of Way are retained and it is indicated that these will be developed too, creating a potentially good network of non-vehicular routes and an exercise loop that will encourage residents out of their cars. There is however little detail about how the PRow will ultimately become *“wide, illuminated spaces with good natural surveillance and attractive spaces.”* (p.52 DAS, CD 1.17) and this would be expected in the masterplan and supporting design code.

4.2.2 The existing uses of the properties on the site are however of some concern with a builder’s yard located just off the Application A site on Lords Lane, a dairy with a variety of other commercial uses including a car valeting business on Moss Lane, a poultry wholesaler on Flag Lane alongside approximately 45 individual dwellings. Whilst these co-exist

with the low volume of pedestrian and cycling traffic at present, there appears scant consideration of how this will work with the higher levels of footfall and cycle traffic anticipated. Of course, this will be covered in Mr Stevens' Highways evidence but as there would be a clear impact on the quality of place, it is also relevant here.

4.2.3 With regard to public transport, a number of bus routes pass within reasonable distance of the site and consideration has been given in the wider masterplan to extending an existing service to loop through the new development. However, it should be noted that this will not be possible within the sites of Application A and Application B considered here as the proposed route passes through an area that is not part of the appeal sites being considered here. The termination of the bus route is clearly shown on the Application A Illustrated Masterplan (CD 1.6). It is indicated in the Transport and Access Statement (para 12.104, CD 1.36) that there will be a new bus service every 30 minutes between Preston and the development site. It is presumed, that until such a loop is possible (via the completion of the CBLR) buses will have to turn around somewhere within the Application A site, although where, or how this will work, is not stated.

4.2.4 The inability of these applications to deliver the CBLR and therefore proposed bus loop through the site serves as an example of how the vision of the masterplan, which prioritises walking, cycling and shared transport over the private car, is not deliverable via the piecemeal outline permission process adopted. This creates a degree of uncertainty that the overall comprehensive vision for 'The Lanes' can be delivered at all, and at the very least that delays and compromise through multiple Reserved Matters applications could beset that delivery and ultimately water down the quality of the place. This is precisely what a properly comprehensive masterplan approach would avoid.

4.3 Facilities and services

- 4.3.1 The Masterplan (p.4, CD 1.16) outlines a good array of facilities and services being brought forward including a two-form primary school and a 2,500m² local centre and it is good that these are all included in the site for Application A. Similarly, the agreement with Penwortham Town Council over the upgrading of the existing community centre, located to the north of the site (via CIL) is positive.
- 4.3.2 However, the Application A and B Phasing Plan (CD 1.15) merely divides the sites into parcels but does not provide any indication of the sequence in which they will come forward. It is instead suggested that this will only be agreed via condition once SRBC grants permission (p.37 CD 1.16). This adds uncertainty to the process and could jeopardise the early provision of essential facilities and services. With a poor array of local shops and services within easy walking distance and a 'vision and validate' approach predicated on 'local living' any delay in the provision of services would likely result in increased use of private cars and undermine the overall vision for the place.
- 4.3.3 Subsequently, as recently as June 2022 an Indicative Phasing and Implementation Plan (CD 10.18) was provided which adds more detail but is only indicative and is flagged 'for discussion.' This provides some comfort in the front loading of some facilities and services, such as an interim mobility hub and community concierge in phase 2 and developing the local centre in phase 3. In addition, the provision of amenity green space and equipped play areas in Phase 1 is welcomed. There is also a stated commitment on p2 of the Indicative Phasing Plan (CD 10.18) *"To create a community at the heart of the development as soon as possible, and to give early occupiers easy access into the existing urban area to the north."*

4.3.4 The information contained in the Indicative Phasing and Implementation Plan (CD 10.18) is reassuring and to some extent it could be considered to ease the earlier concerns. However, this report is only 'indicative' and 'for discussion' whereas it should be a commitment and have formed part of the submission which clearly included inadequate phasing information. A truly comprehensive approach would have included detailed phasing information and thus provided the confidence that the vision outlined in the masterplan could be delivered.

4.4 Homes for everyone

4.4.1 The precise nature of the tenure mix and the amount and type of affordable housing provision are beyond the scope of this evidence and appear to be covered in the Statement of Common Ground. However, what is of relevance here is the design and location of all homes and to that end a commitment to affordable homes being indistinguishable from private market properties (tenure blindness) and the dispersal of affordable dwellings across the site (pepper-potting) is required.

4.4.2 There is no specific mention of either of these important principles in the documents reviewed, but the statement that 30% affordable homes will form part of all phases (p.32 CD 1.16) does reduce the risk of clustering in one part of the site. This should be further reinforced with an unambiguous commitment to design tenure blind homes and disperse them throughout each of the phases of development. It is accepted that theoretically, this could be left to each of the multiple Reserved Matters applications that would follow, but tenure blindness and pepper-potting should be firm principles that are set at this earlier stage. This would serve to reduce the risk and simplify the multiple Reserved Matters applications going forward, providing precisely the

sort of comfort that a comprehensive masterplan supported by a robust design code should provide.

4.4.3 There is also the issue of the accommodation mix to consider. The exact make up of this will only be established through the detailed design process as a part of reserved matters and this is as expected. However, the information provided to guide this, the design code, is lacking in detail. There is a statement in the site wide design code (p.62, DAS, CD 1.17) which says that *'it is anticipated that each neighbourhood will have a full range of dwelling sizes from 1-bedroom to 5-bedroom homes.'* It should be noted that this is different to the statement on p.48 of the same document. Under the heading 'Residential' it states: *"The proposed residential development will comprise a mix of detached, semi-detached, mews and apartment dwellings ranging from 1 – 4 bedrooms size.'* That inaccuracy aside, it would be expected that more detail on the accommodation mix to be contained therein would be provided in the individual character area codes.

4.4.4 The Application A Parameter Plan – Building Heights (CD 1.12) is very broad in its approach and serves only to reduce building heights to a maximum of 2.5 storeys in close proximity to existing homes. One area of concern in the Site Wide Code (p.62, DAS CD 1.17) is the statement: *'The heights will predominantly be up to three storeys, with two and a half stories (sic) in key locations to add design interest.'* This could be a typographical error, but it seems to imply that most homes will be three storeys with feature properties lower at two and a half storeys. Of course, it is not expected that all homes will be of the maximum height permitted and this too will be developed during the reserved matters process, but again the design code, specifically the detailed character area codes should provide more information and more clarity about how building heights will be dispersed.

4.4.5 Overall, whilst what is included in the masterplan is considered to be broadly appropriate, the lack of detail and sometimes conflicting information on the tenure mix, the accommodation mix and the proposed building heights, is problematic. This risks unnecessary complication and delay as these issues are negotiated through the many Reserved Matters applications that will follow. Setting these key principles and avoiding these risks is why Policy C1 of the SRLP (CD 5.2) requires a 'comprehensive approach' to deliver the vision for 'The Lanes' thus avoiding potentially harmful piecemeal development of this important allocated site.

4.5 Making the most of what's there

4.5.1 This site is large and complex, not simply because of the considerable size, but also because of the many existing houses some in large plots and a range of other business uses spread across its entirety. These homes and businesses are currently only accessible via a network of attractive 'Lanes'. The decision to integrate these Lanes along with existing hedgerows and trees into the development and create a sustainable movement network is appreciated as they are key in defining the character of the area. However, it is worth restating that whilst the vision is supported, there are real concerns over how this will be delivered, including how the integration of the existing Lanes will work. The technical aspects of this will be covered by Mr Stevens in his Highways evidence and the urban design concerns have been discussed above.

4.5.2 Another area of concern is the relationship between the proposed development and the existing houses and business premises across the site. The general approach taken in the masterplans for Application A and B (CDs 1.6 and 1.13 respectively) is generally to provide a buffer

space around them, although this is not always the case. There are a number of places on the illustrative masterplans where difficulties are likely, such as the proximity of new dwellings to existing ones along Bee Lane (CD 1.6) and the interfaces between homes and the various large shed business uses of the dairy, the poultry farm and others.

4.5.3 These are only illustrative layouts as a part of an outline application, and there will, of course, be changes as the detailed design and reserved matters process proceeds, but the opportunity to establish some firm guidance through the coding process about how to achieve sensitive transitions between the existing and the new has not been fully exploited. This gives rise to a significant risk of unnecessary delays and complication through multiple Reserved Matters applications and the net result will be a watering down of the laudable vision for 'The Lanes' and what will amount to effectively piecemeal development of an important allocated site.

4.5.4 On a positive note, the influence of the landscape area and character analysis undertaken in the DAS (pp.18-19, CD 1.17) is apparent and the key opportunities afforded by the landscape and potential views have been taken. Tree removal appears to have been kept to a minimum and the surface focussed SUDS approach provides the real opportunity to increase habitats and biodiversity as well as contribute towards the character and sense of place.

4.6 A memorable character

- 4.6.1 This is a very important site with a special rural character based on the existing Lanes and the dispersed pockets of existing development. This is identified in the DAS (CD 1.17) and the sites are divided into sensible character areas. The retention and repurposing of the Lanes and as much of the landscape character as possible is a good start and there appears to be an understanding that character is not only derived from buildings but from streets, the urban grain and green and blue infrastructure.
- 4.6.2 The importance of character, including looking beyond the site for contextual cues, is stated in local and national policy, including Paragraph 130 of the NPPF (CD 4.1), Policy 17 of the CLCS (p.104 CD 5.1), G17 of the SRLP (p.96 CD 5.2) and guidance including Characteristic One of the NDG (CD 10.15) and Objective 6 of BHL (CD 10.17). However, what appears to be missing from the application is any meaningful local character study. There are a series of photographs of the site included in the DAS (p.13-17, CD 1.17) but these are simply reprinted, with no supporting analysis. Furthermore, they appear to be only photographs of the sites themselves, with no context drawn from the wider area, beyond the red line.
- 4.6.3 As a result, it is not clear how the existing local character has informed the decisions such as the selection of facing and hard surface materials suggested in the character area codes. Are these locally responsive materials? How do they fit within the Penwortham and wider South Ribble and central Lancashire context? Of course, it is expected that the designs and specifications will develop through the multiple Reserved Matters processes and materials can be conditioned. However, the design code, specifically the detailed character area codes, provide an opportunity to aid this process and help ensure a

comprehensively designed place and they are distinctly lacking in both detail and local reference.

4.6.4 The division of the large Application A site into different character areas is handled well in the main, with only one area of confusion. The 'Urban Edge' character area is oddly titled, unless the West Coast Mainline provides the urban element. However, this character area is confusingly disjointed by the nature of the outline applications considered here, with a significant proportion of it forming the Appeal B site, indeed all of this is contained in the 'urban edge' character area and only a small section of the Appeal A site on the northern edge of the non-shaded area that does not form part of these applications. Furthermore, this division is not a natural one occurring as it does through the middle of two perimeter blocks. This can be seen clearly in the Design Code section of the DAS (Figure 9.0, p.64 and Fig 9.4 p.73, CD 1.17) and requires further clarification.

4.6.5 Aside from the issue of contextual cues for the selection of the materials, as discussed above, there is also a similar lack of contextual reference with the suggested design features. For example, there is no rationale for the houses described in the Urban Edge character area to be '*taller, more modern terraced homes*' (p.75, DAS, CD1.17). It is accepted that this area provides more opportunity for '*character creation*' (p.74 *ibid*) but what is the inspiration for these and why in this part of the site? It should be clear that the intention here is not to stifle creativity or encourage pastiche design but some understanding of the design rationale would be welcome.

4.6.6 It is appreciated that much of what is discussed above will be developed through the multiple individual Reserved Matters applications that will follow, but a wider contextual character study and more responsive design coding would have helped to guide that process. This would

reduce the risk of delays and complications created by these issues being dealt with on a case-by-case basis. A more detailed masterplan and design code would make the creation of a coherent place more likely and also help to ensure that this development is not an 'anywhere' one but is instead very much from and of the local area. It is suggested that this is a key part of the comprehensive approach that Policy C1 of the SRLP (CD 5.2) demands and is supported by Paragraphs 126 and 130 of the NPPF (CD 4.1) and guidance in the NDG (10.15) and NMDC (10.16) which all require developments to be sympathetic to local character and context.

4.7 Well-defined streets and spaces

4.7.1 The masterplans that are being considered here for Application A (CD 1.6) and Application B (CD 1.13) are of course only illustrative and so this will not be a detailed discussion about layouts, more a review of the principles that are set out.

4.7.2 On a masterplan-wide level, there is a clearly defined hierarchy of streets (see DAS, Fig 8.1, p.57, CD 1.17) and the illustrative masterplan layouts for Application A (CD 1.6) and Application B (CD 1.13) indicate that most houses are arranged in perimeter blocks which is positive. Similarly, as a result of the aspect of the frontages public open space appears to benefit from passive surveillance as shown in Fig 4.6 on p.37 of the DAS (CD 1.17). All of these elements help to create well defined streets and all are welcomed.

4.7.3 This definition of streets and spaces is explored further in the site wide design code (pp58-62 DAS, CD 1.17) which outlines good basic urban design principles across the masterplan areas, including front doors facing the street and houses turning corners. Whilst there is some

indication of the variations in how this is applied across the different character areas, such as the suggestion that the Bee Lane frontages are closer to back of pavement, it is felt that the approach could be more detailed and the code could be a little tighter, leaving less to be negotiated through the multiple Reserved Matters applications and providing more confidence going forward.

4.7.4 The National Model Design Code sets out six aspects of 'Built Form' that should be covered in an urban extension such as this (Fig 2, p8 and explained more fully on pp.20-22, CD 10.16) and whilst most of these are touched upon, greater depth and clarity for each of the character areas would be beneficial and help provide a more robust design code to guide future development through the reserved matters application process that will follow. This is the reason for the comprehensive approach set out in Policy C1 of the SRLP (CD 5.2).

4.8 Easy to find your way around

4.8.1 Again, it is important to note that both of the masterplans being considered for Application A (CD 1.6) and Application B (CD 1.13) are illustrative and so this evidence will deal with the general design approach adopted as opposed to specific details of the layout.

4.8.2 The masterplan site is predominantly flat with some undulation but no significant changes of level. Therefore, the potential to exploit aspect and views is not considerable, but the presence of the Lanes and a variety of existing buildings should aid legibility. Added to this, the use of distinct character areas, with variations in typologies and materials and a reasonably well-defined hierarchy of streets, along with the swales and other landscape features will all aid wayfinding too.

- 4.8.3 However, the major problem with the legibility of the appeal sites, is created by the nature of these two outline applications and the non-completion of the CBLR. The result is a disjointed scheme with a severed principal route that compromises the hierarchy of streets and would hinder wayfinding and a sense of a unified place.
- 4.8.4 In addition, whilst it is indicated that changes in building heights and corner turning homes will aid legibility, the key locations of these is not identified and this would be a useful addition to the sketch plans of the various character areas in the design code. Again, this lack of detail in the design code leads to a risk of delay and complication through the Reserved Matters processes that will follow, exactly what the comprehensive masterplan approach set out in Policy C1 (CD 5.2) was designed to avoid.

4.9 Healthy streets

- 4.9.1 As would be expected at outline application stage the information provided here is at a broad level, but the adoption of the vision and validate approach to move the emphasis away from cars and to pedestrians and cyclists is positive. Streets appear to be designed to reduce speeds and the network of cycle and pedestrian sustainable routes follow existing rights of way and likely desire lines.
- 4.9.2 The section relating to Healthy Streets in the site-wide part of the code (p.53, DAS, CD 1.17) sets out some very good guiding principles which are illustrated by some excellent precedent images. What is less developed is the way in which these laudable objectives will be delivered through the different character areas in the more detailed coding, which again is lacking in detail.

4.9.3 One further point of potential concern with regard to this objective (and referred to above) relates to the retained Lanes and, (a) how the use of these can be restricted to the residents of the existing houses and businesses and, (b) the extent to which there could be conflict between increased numbers of pedestrians and cyclists using these Lanes and vehicles. This is discussed in more detail in the ‘Natural Connections’ section above (pp.12-16 of this Proof) and will feature in the Highways evidence of Mr Stevens.

4.10 Cycle and car parking

4.10.1 The information provided on cycle and car parking in the Masterplan (CD 1.16), the DAS and Design Code (CD 1.17) is very limited. There is a firm commitment to the ‘vision and validate’ approach and a focus away from the private car, as illustrated by the following extract from p.55 of the DAS (CD 1.17) which states:

“Every element of the development should be scrutinised to ensure that walking and cycling are the encouraged modes of transport. Cycle parking should be made easier than car parking. Walking to the local centre should be easier than driving.”

4.10.2 This aspiration is supported. However, the reality is that for a development of this size, in this location use of the private car will remain considerable and it is considered remiss not to set out a clear parking strategy in the Masterplan and Design Code.

4.10.3 A good parking strategy should be expected to vary across the different character areas in accordance with the density and typology, and include a mixture of in-curtilage parking, small parking courts and adequate shared and unallocated on street parking. More indication of what a good parking strategy should deliver is included in BHL, under the ‘Cycle and car parking’ section (pp69-73, CD 10.17).

4.10.4 What is included in the DAS is a statement that car parking will comply with the relevant standards:

“Parking throughout the development should be provided in accordance with relevant Parking Standards contained within the SRBC Local Plan and in agreement with LCC. This will ensure that the potential impacts of on-street parking, as a result of the proposed school and local centre, as well as other uses, do not have an impact on the operational reliability of the highway network.

Consideration will be given to the traffic management measures and the implementation of traffic regulation orders as appropriate. Detailed parking provision by land-use will be addressed in subsequent Transport Assessments as the development is brought forwards on a phase by phase basis.”

(p.49, DAS, CD1.17)

4.10.5 This is the bare minimum of what could be expected. A suitable parking strategy is not only needed to ensure that parking does not have an impact on the operational reliability of the highway network, but also to ensure that the quality of the place is not negatively affected, cars do not dominate the streetscape and ultimately that the vision for ‘The Lanes’ is not delivered.

4.10.6 The DAS (p.61 CD 1.17) states ‘*car parking spaces should be located so that they are well overlooked*’. It also states that ‘*parking will generally be within the curtilage of the dwelling or in designated parking areas*’ (p.84). All sound principles, but this does not constitute a parking strategy. Most tellingly it states on p.83 of the DAS that: ‘*More details will be submitted as part of a future Reserved Matters Applications.*’

4.10.7 This reliance on the Reserved Matters process to deliver the parking strategy runs counter to the purpose of the comprehensive approach including a masterplan and design codes (as set out in Policy C1 of SRLP (p.25 CD 5.2), namely, to set these at a strategic level thus creating a coherence and unified place as opposed to a series of

piecemeal developments. The importance of detailed consideration of parking strategies is set out in the National Design Guide (CD 10.15) and explained further in the NMDC (CD 10.16).

4.10.8 A possible underestimation of the extent of the use of the private car, coupled with a lack of a coherent parking strategy that includes visitors and temporary parking, will pose a significant threat to the success of 'The Lanes.' Unplanned for occurrences, such as a preponderance of informal kerb parking and difficulties around the start and end of the school day, will have a negative effect on the quality of the place and the delivery of the vision for 'The Lanes.'

4.11 Green and blue infrastructure

4.11.1 There is much to commend this aspect of the two applications. Firstly, it is stated that the proposals provide for a biodiversity net gain, with the system of Lanes acting as ecological corridors across the site. Secondly, with regard to the wider masterplan, the green and blue infrastructure is generally well-located with the buffer to A582 Penwortham Way and the main spine road incorporating what appears to be a characterful, surface-based SUDS with vegetated swales. Similarly, the buffer to the northern boundary, the new primary school with the associated grounds and the LEAPs and LAPs are considered to be well located.

4.11.2 Overall, the basic approach taken for the green and blue infrastructure strategy, as described in the Masterplan (p.28 CD 1.16) is supported. Furthermore, the bulleted list set out in the site wide design code under the title 'Green and Blue Streets' (p.53 *ibid*) includes some good points illustrated by strong precedent imagery.

4.11.3 However, as with a number of other aspects of the proposals there is a concern that this list of aspirations has not been developed through the more detailed character area codes and this gives rise to concern that it will be fully delivered. For instance, the surface SUDS train, with the characterful and bio-diverse swales running along the primary streets is an excellent idea, but it requires more explanation to assist in creating the confidence that this key aspect of the overall vision for 'The Lanes' can be delivered through the multiple Reserved Matters applications that will follow an outline permission.

4.12 Back of pavement, front of home

4.12.1 Of all twelve of the objectives set out in BHL (CD 10.17) this is the one most closely focussed on detailed design and as a result is perhaps the one least applicable to these outline applications. There are however two areas which would benefit from some more detailed guidance in the design code.

4.12.2 Firstly, whilst there is some mention of the setbacks and boundary treatments across the different character areas included in the design code, this is not in any detail and should be explored further.

4.12.2 Secondly, the design coding process can, and should, highlight the need for adequate external storage for refuse and recycling bins as well as direct access to rear gardens without the need to go through the house, if they are to be kept there. Examples of the sort of solution that should be provided for each of the typologies in each of the character areas should also be included.

4.12.3 It is clear that the intention is for these issues to be left to be resolved during the multiple Reserved Matters applications that will follow an

outline permission. However, as stated on previous occasions in the Proof, this exactly what the comprehensive masterplan approach set out in Policy C1 (CD 5.2) was designed to avoid.

4.13 Overall assessment

4.13.1 Whilst this Proof is not intended to be a scored Building for a Healthy Life assessment, there are a number of issues that would be very likely to lead to red lights being awarded should that exercise be undertaken. This is clearly very different to the self-assessment carried out by the appellant (pp82-83, DAS, CD 1.17) which unsurprisingly claims that all objectives have been met.

4.13.2 It should also be noted that in Policy 17 of the Central Lancashire Core Strategy (p104, CD 5.1) there is a requirement for Building For Life Gold or Silver for all new residential developments. Whilst the gold and silver standards relate to the earlier Building For Life 20 assessment, it is my firm opinion that the proposals considered here for the Appeal A and Appeal B proposals would not meet that threshold.

5.0 Summary and Conclusions

- 5.1 It is agreed that this is an important site with a special character and a number of factors, such as the existing Lanes and the properties they serve, make it a complex design problem. This is recognised in the SRLP and Policy C1 (CD 5.2) which is clear that a comprehensive approach including an agreed masterplan and design code is required. I do not consider that the information submitted to form the two applications under consideration here amounts to that comprehensive approach.
- 5.2 There are two main areas of contention. Firstly, there are placemaking concerns connected to the impact of the way that these applications have come forward for outline permission with a significant section of the overall site not included and the CBLR left incomplete. Secondly, that the masterplan and supporting design codes do not provide a level of detail to provide confidence that the vision for 'The Lanes' can be delivered through the multiple reserved matters process that will follow.
- 5.3 Whilst there has been an attempt to adapt and develop the master plan for the two applications A and B (Section 4, pp28-38, DAS CD 1.17), this has not been wholly successful and there remains a number of problems as highlighted in the evidence, not least the inability to deliver the through spine road and make the proposals properly connected. This has a number of implications to the successful creation of a place as discussed above and results in what is considered to be a fundamental flaw in the appeal masterplans.
- 5.4 Similarly, with regard to the design code included in the DAS (CD 1.17), this does not include some elements that could usefully have been included and would have provided more confidence going forward that a successful place could be delivered. The approach throughout is to

leave too much to be established through Reserved Matters, which is exactly what Policy C1 of the SRLP (CD 5.2) and the need for a comprehensive masterplan and design code seeks to avoid.

- 5.5 The net result of these issues, as highlighted in the evidence above, and the adoption of a less than comprehensive approach, leads to potential harms and a degree of uncertainty that the rightly ambitious vision for 'The Lanes' can be delivered in a way that is locally responsive and builds on the special sense of place that the area possesses. This is in contravention of Policy C1 of the SRLP (CD 5.2), Policy 17 of CLCS (CD 5.1), Paragraphs 127 and 130 of the NPPF (CD 4.1) and much guidance contained in the NDG (CD 10.15) and NMDC (CD 10.16).



PLANNING COMMITTEE
THURSDAY, 17 SEPTEMBER 2020

DECISIONS

Set out below is a summary of the decisions taken at the meeting of the Planning Committee held on Thursday, 17 September 2020. The wording used does not necessarily reflect the actual wording that will appear in the minutes.

6 Pickering's Farm Masterplan, Penwortham

RESOLVED: (Yes: 8 No: 4)

That the Pickerings Farm Masterplan, Design Code and Infrastructure Delivery Schedule as submitted by Taylor Wimpey and Homes England be refused as a result of concerns regarding highways; green infrastructure; ecology; drainage provisions; impact on air quality; lack of appropriate and necessary infrastructure; inappropriate mix of housing; and the impact on the residential amenity of the wider community.

Date: 21 September 2020

Your ref: Our ref: The Lanes Masterplan

Please ask for: Janice Crook

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Dear Jon

RE: THE LANES MASTERPLAN

Further to the planning committee meeting of 17th September 2020 when the submitted Masterplan for The Lanes relating to the Pickering's Farm site at Lostock Hall was considered, I write to advise that Planning Committee voted to refuse the Masterplan.

The officer report highlighted the following areas of concern in the recommendation:

- Local Highway Authority with the aim of addressing the matters highlighted in their consultation response
- Network Rail to address the use of the Bee Lane and Flag Lane railway bridges
- Highways England to address issues of the impact on the Strategic Road Network
- The building heights parameters plan and the wide spread of 3 and 4 storey buildings
- To provide certainty with regard to deliverability especially with regard to key infrastructure such as highways, sustainable access, education, community facilities, sports provision and affordable housing

In addition to the areas to be addressed in the Officer's Committee Report the following issues were identified by the Committee for you to address:

Green Infrastructure

- Increase amount of Green infrastructure and Public Open Space which respects the rural character of the area and protects the high quality elements such as the Orchard.
- Firm commitment for the retention of Orchard site
- Green Infrastructure under the Pylons not to be counted towards Policy compliant POS as this does not provide a high quality, usable environment
- Firm commitment to retain all existing hedgerows and trees of A and B category

Ecology

- Ecology surveys of whole of Masterplan site, regardless of ownership and including Safeguarded Land

Drainage

- Further consideration of proposed to discharge surface water to Mill Brook

Environment

- Air Quality Assessment and robust mitigation and management measures

Infrastructure

- Firm commitment for the deliverability of key infrastructure and robust wording in the infrastructure delivery schedule
- Bee Lane and the railway bridge are part of proposed 'exercise route' in Penwortham Town Plan, consideration of how proposals will impact on this
- Commitment to complete the village centre in first phase of development
- Include proposals for a Train station and associated car parking
- Further details of how 'Green Lanes' will work
- Further details of bus/cycle/pedestrian link to Kingsfold will work in practice. Highway safety impact on car park to community centre

Mix of Housing

- Older persons provision to include a proportion of single storey bungalows as per the requirements of Policy in the Penwortham Town Neighbourhood Plan
- Masterplan must be fully compliant with Penwortham Neighbourhood plan policies 4, 6, 8
- Restrict dwellings to 1 and/or 2-storey only adjacent to existing properties
- Removal of reference to 4-storey

Community Impacts

- Details of the impacts on Chain House Lane and the wider area to the south – Croston Road, Church Lane etc
- Communities are not created, they evolve, Masterplan needs to demonstrate how this new community will evolve
- Measure to mitigate the impact on residents during site preparation and construction

Additionally, there are a number of matters raised by consultees in their written consultee responses which are required to be addressed, these are set out on the attached sheet.

We would ask that you give due consideration to all these matters for inclusion within a new Masterplan for the site.

I suggest the best route forward would be to take some time to consider all the issues raised and when you have had chance to consider them a wider meeting would be very beneficial. We can then look at more thematic issues in a finer level of detail at subsequent meetings such as highways.

In the meantime if we can be of any assistance please do let me or one of the team know.

Yours faithfully



Jonathan Noad MRTPI AssocRICS

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Local Highway Authority matters highlighted in their consultation response, namely:

- A - Masterplan Viability and Ultimately Deliverability of the Masterplan
- B - Specific Consideration to Timing of Delivery of the Full Cross Borough Link Road
- C - Provision for Sustainable Movements
- D - Infrastructure Delivery Schedule
- E - Highways Technical Note (Masterplan Appendix C)
- F - Various other General Comments and Observations
- G – Properly Planned Approach as opposed to Piecemeal Development

Network Rail matters highlighted in their consultation response, namely the use of the Bee Lane and Flag Lane railway bridges:

- Masterplan indicates that a new overbridge is required to accommodate the significant increase in traffic flows predicted, no mention is made of who will finance the new structure or when it will be open for use.
- The new overbridge needs to be installed and operational prior to occupation of the intended development.
- Proposal to construct a footway on Bee Lane overbridge does not appear feasible.
- If found to be feasible, the bridge parapet height must be increased to achieve compliance requirements.
- Proposals to alter any NR structure first require the submission of design drawings detailing the scope of the aspirational change and show how disruption to current overbridge users shall be mitigated.
- Project will be required to enter into various agreements detailing how Network Rail costs will be captured in full throughout the project lifecycle.
- The masterplan must also consider the potential impact of the development on the Footpath/bridleway network, with particular reference to Level Crossings.
- There is a third bridge to the south east of the development. Although the bridge has not been specified within the masterplan as having any traffic impact, it is important to consider all structures where there might be any increase of overall use.
- Masterplan suggests that Bee Lane would only service an extra 40 dwellings, however, once the internal link road is completed it would service the whole of the development
- Construction traffic must not use either Bee Lane or Flag Lane overbridge for the purposes of accessing/ egressing the proposed development.
- The current Network rail access point on the approach to Bee and Flag Lane overbridges provide 24/7 maintenance and emergency access to the railway and must remain obstructed.

Highways England matters relating to the impact on the Strategic Road Network:

- Paragraph 1.1.5 of the Masterplan transport chapter states that *“This assessment has been requested by Lancashire County Council (LCC), the local highway authority, to inform their consideration of the Masterplan only”*. It is necessary to understand what the impacts of the additional traffic growth generated by the full 2000 dwellings upon the SRN would be.
- Appendix ‘C’ transport chapter of the Masterplan - revisions do not address the areas of concern raised in the latest response to the current outline planning application for 1100 dwellings. Highways England therefore request that this section of the Masterplan seeks to incorporate the level of information that has been requested.
 - Information presented for the Cuerden Strategic Site is not what Highways England understood to be the latest consented. Croft to confirm that this represents the latest consent on the site and supersedes the 2017 information.
 - The original routing output should be provided or recreated to provide a clear audit trail on distribution assumptions towards Preston or a sensitivity assessment including the M6 route to understand the potential implications for traffic flows to the SRN.
 - Further consideration on the cumulative impacts and potential operational implications, if any, of the change in flows.

- If historic journey to work patterns are not fully reflective of the patterns for the proposed site this may result in a different impact to the SRN. To assist in understanding this potential impact we would suggest a sensitivity distribution is undertaken using an employment gravity model.

Because of the connection between the Masterplan (as the guiding planning document for the overall site allocation) and the known individual portions of the site coming forward as planning applications (such as that currently for 1100 units), sufficient scenarios should be presented within the Masterplan to allow evaluation of this. Highways England recommend that the Masterplan should be presenting this information for consideration along with the 1,100 dwellings in for planning.

Environmental Health matters of the traffic impacts on Air Quality and particularly its significant adverse impacts on the Lostock Hall Air Quality Management Area, and the impacts on public health, both in terms of mortality and quality of life. It is therefore important that action is taken to minimise the impacts of poor air quality.

The submitted AQA considers two options, the first the proposed development without a cross-borough link road and the second with the cross-borough link road. The air quality assessment methodology was discussed with the consultant and in line with the councils preferred methodology. However, the assessment has been based on 0% of HDV traffic, given the proposed use of the development – i.e. school, shops, community centre, elderly accommodation, there is likely to be some HDV traffic associated with deliveries, waste removal etc. The 0% HDV traffic is therefore considered unrealistic.

There is a significant damage cost with direct impact on the health of those in the vicinity of the development. The damage cost assessment should be used to inform the level of mitigation required. Standard mitigation measures required on all developments irrespective of any damage cost analysis are electric vehicle charging points, secure cycle storage and control of construction emissions.

The submitted AQA suggests additional mitigation measures in the form of:

- Support and promotion of car clubs
- Management of bus fleet composition – it is unclear what this relates to
- Improvements to cycle and walking infrastructure – again it is unclear what this relates to, but anything on site will be required under separate considerations and would not be included as additional AQ mitigation measures. Is this improvement of off-site infrastructure beyond that required by Highways?
- A detailed travel plan
- On-site shower facilities

Climate Change - The council declared a climate Emergency in July 2019 with a goal to ensure the borough was carbon neutral by 2030. The UK government have similarly made a declaration using 2050 as a target. The proposed development, one of the biggest to be seen in South Ribble which will take until 2035 to be completed. The suggested measures to reduce the current CO2 emission rate by 10% is not compliant with the Council's aims and the Masterplan must include measures to compensate for Climate Change and the Council's Climate Emergency. The scheme is ideally suited to improved carbon reduction measures such as a central heating system (Ground source heat pumps), air source heating improved green energy production through the use of solar panels on every property something given the scale of the development will reduce installation costs and provide a much needed source of green power, improve efficiency within the units.

GMEU – and the matters highlighted in their consultation response, namely:

- Details of the metric used and the assessment provided for Biodiversity Net Gain of 10%
- Extent of Ecological Surveys– no additional survey undertaken to inform updated version of Masterplan
- Certainty for Lords Lane Orchard (UK BAP, Habitat of Principal Importance). The text is too vague and lacks any real commitment to retain this orchard. Landscape Appendix F adds to the uncertainty

- Hedgerows and the plan at figure 7.0 of the Masterplan has been adjusted to include better representation of the high value native species rich hedgerows but key states 'species poor' and same plan is not transposed and used in Appendix F at 2.7
- Update masterplan to include the overview figure (G6900.012B Sheet 1 to 5) from TEPs initial report (Appendix 7.3 Hedgerows)
- Further careful consideration of the use of a sensitive lighting scheme which may be in conflict with the cycle and footpath analysis presented within Appendix f section 3.4
- Landscape Vision and Masterplan Development Appendix F – use of terminology of 'rough grassland' is concerning as this is not generally species rich and considered an opportunity to reduced cutting regimes to one cut per year with no lifting of arisings. Such management rapidly results in reduction in the diversity of any wildflower seedings.

United Utilities - re-iterated their response to the January Masterplan as the matters raised have not been fully reflected in the updated Masterplan, namely:

- The IDS does not reference new water and wastewater infrastructure
- Further clarification on the statement that surface water runoff from the site will be restricted with discharge to Mill Brook either directly or indirectly through the existing watercourses within the site or the culverted tributary to the north
- Confirmation that no surface water will drain into the public sewerage system either directly or indirectly.
- The masterplan to clearly set out the need to follow the hierarchy of drainage options for surface water in the NPPG which identifies the public sewer as the least preferable option for the discharge of surface water.
- Further information regarding the statement that, based on anticipated ground conditions and the potential for shallow groundwater, infiltration is not considered to be a suitable method of surface water disposal
- A site wide management and maintenance plan for the lifetime of the development will be required to ensure the continued effectiveness of the on-site systems
- Due to the phased delivery of the on-site foul water system, a site-wide sustainable foul and surface water drainage strategy is required to cover the whole site. The site wide strategy will need to be upheld through the phased delivery of the scheme and the delivery of each phase will need to be fully compliant with that strategy.
- Foul pumping will be necessary and as per the discussions held to date with the applicant we request that the number of foul pumping stations are minimised to provide a single pumping station.
- Further information regarding any temporary drainage measures during construction. For clarification, the expectation will be for only foul flows to communicate with the public sewer.
- Detail to ensure the drainage and design principles set out within the masterplan are met through each development phase, irrespective of the timing of its delivery or the ownership status of the land.
- Details of a pro-active approach to sustainable drainage to ensure communication between phases so there is sufficient capacity to serve all the development sustainably in the development area and not just one phase. The development will need to enhance the environmental quality of the immediate area and manage the effects of climate change.
- Consideration of the use of systems such as rainwater harvesting and grey water recycling that help to reduce pressure on public water supply and the public sewerage system.
- Require a management and maintenance regime to ensure the efficient use of the proposed swales, to prevent the systems not functioning properly and thereby undermining the site wide drainage strategy which in turn will increase the risk of surface water flooding.
- The delivery of water and wastewater infrastructure should be considered alongside the broader infrastructure for the site to ensure efficiencies in design and to maximise opportunities for sustainable development.

Education – the matters raising in their consultation response, namely:

- Area of land to the south of the marked boundary currently shown for housing, to be incorporated into the school site to help mitigate the constraints on the width of the site due to the existing high pressure gas main and the flood mitigation measures proposed.

- Any raising of levels on the school site to address flooding cannot be within the gas easement and would need to be incorporated within the school boundary resulting in a 200m strip of land having to accommodate a change of level and therefore render it unusable for playing surfaces.
- A boundary onto Bee Lane would benefit the layout of the school grounds and provide potential for a pedestrian entrance.
- There are a number of easements to services which will constrain the site development.
- The school site is very wet with virtually the whole area being classed as susceptible to surface water flooding and currently drains into existing ditches. A new site drainage system would have to be introduced, connected to the new/existing infrastructure. Maintenance of this new drainage system should not be the responsibility of the school.
- The overall site looks relatively flat but the drainage does all run north which would suggest the site falls in this direction. It would therefore be reasonable to assume the school site is lower than 27.6m and would have to be raised to address flood risk. This will add a further constraint to the position of pitches or hard courts towards the northern boundary. The site will be required to be raised to make it acceptable.
- There remains uncertainty regarding how the mitigation of the strategic development impact on school places is being funded. The latest Masterplan and IDS now notes that school places will be funded through CIL, with the site to be secured through a Section 106 agreement. Given the other infrastructure listed as utilising CIL, funding may not be available to address the impact of this development and a Section 106 contribution should be sought for both the provision of the school site and the cost per place contributions that are required to meet construction costs.
- As part of this Masterplan adoption process all parties should be in a position to agree the funding arrangements for the provision of a new school, so that there is no uncertainty.

Penwortham Town Council and the matters raised in the consultation response, namely:

- Lack of provision of bungalows. Policy 4 of the Penwortham Neighbourhood Development Plan (NDP) states that new residential developments should provide 10% of the development for retirement properties through a range of property types, in particular, to provide bungalows.
- Assurances that the proposed new primary school will not be built until both Kingsfold Primary School and Broad Oak Primary School are nearing full capacity and there is a proven need for the new school.
- The Masterplan proposes a road from the new development, directly past the front of the community centre, cutting off the centre from its car park. If this is the case the Penwortham Community Centre will not be fit for purpose with the majority of users of the centre, including the elderly, infirmed, parent/carer and children and other vulnerable users, not being able to park on the centre car park and gain access to the building.
- Previous Masterplans included provision for a new community centre to be built. The Town Council seek assurances that should the development go ahead and should the road to the fore of the current centre be built then options will be given to relocate the community centre to a new site and that this can be arranged through a partnership agreement.
- The Town Council feel that the use of Bee Lane as an entrance to this site does prejudice the proposed cycling/walking route due to the width of Bee Lane over the entrance bridge and fails policy 8.
- The building heights parameters plan indicates the widespread use of 3 and 4 storey buildings and lacks single storey accommodation, ie bungalows

Police ALO - Secured by Design and security measures should be incorporated into the Masterplan in accordance with the NPPF and Crime and Disorder Act. Some images of proposed dwellings within the design code have features that would be discouraged from a security perspective such as deep recessed doorways and flat canopies over front doors.

Lancashire County Archaeologist - Historic Environment Desk-Based Assessment (August 2019), comprising of at least a first stage of evaluation by means of geophysical survey and/or trial trenching. The need for any further archaeological investigation of the site would be then be dependent on the results of this first stage. Should the Masterplan be agreed in advance of these works being undertaken, were significant or extensive archaeological remains to be found to survive, options either for their preservation in situ, or the potential ability to make changes to the layout in order to avoid the

need for potentially expensive and time-consuming archaeological investigation of the site, will be greatly reduced, or lost entirely.