

**Town And Country Planning Act 1990 - Planning Application Appeal**

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

**By Taylor Wimpey UK Ltd and Homes England**

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**PLANNING PROOF OF EVIDENCE OF RICHARD WOOD  
SUMMARY**

**COUNCIL REF: 07/2021/00886/ORM and 07/2021/00887/ORM**

**APPEAL A REF: APP/F2360/W/22/3295498**

**APPEAL B REF: APP/F2360/W/22/3295502**

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**RICHARD WOOD  
ASSOCIATES**



## **1.0 INTRODUCTION**

### **Richard Wood BA (HONS) BPI MBA MRTPI**

- 1.1 I am a Chartered Town Planner and a Member of the Royal Town Planning Institute (since 1991). I have worked as a planner in the public and private sectors for 33 years. I am a Director at Richard Wood Associates Ltd and work as an independent planning consultant. I hold an Honours Degree in Town and Country Planning and a post-graduate Bachelor of Planning Degree, both from the University of Manchester, and a Master of Business Administration degree from the University of Hull.
- 1.2 Previously I was a Director at O'Neill Associates, Chartered Town Planning Consultants in York, working for public and private sector clients. Prior to working in consultancy, I was Assistant Director for Strategic Planning and Transport at City of York Council and Head of Strategy at the Yorkshire and Humber Assembly (leading the preparation of the Regional Spatial Strategy).
- 1.3 I declare that the case and evidence which I have prepared and provided for these appeals is true and has been prepared in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed by me are my true and professional opinions and that this Proof includes all facts which I regard as being relevant to the opinions I have expressed. I am aware that as an expert witness my overriding duty is to the inquiry irrespective of by whom I am called. To inform my appraisal I have visited the appeals sites and surrounding locality.

### **Scope of Evidence**

- 1.4 My evidence focuses on planning considerations. The Proofs of Dr Price, Mr Stevens, Mr Martin, and Mr Lloyd respectively address design, transport, air quality and financial viability matters.
- 1.5 A main Planning Statement of Common Ground (Main SoCG, CD10.4) and a Statement of Common Ground on transport matters (Mobility SoCG, CD10.5) have been agreed and submitted.

## 2.0 Summary and Conclusions

### Introduction

- 2.1 The appeals proposals involve two applications for development. Application A includes principal means of access and residential-led mixed use development comprising of up to 920 dwellings and community facilities and infrastructure. Application B is for up to 180 dwellings and principal means of access, similarly all other matters are reserved. Up to 1,100 residential dwellings are proposed in total, with 30% proposed to be affordable dwellings and just over sixteen hectares of green infrastructure is proposed across both sites. An Illustrative Masterplan shows one possible arrangement of the proposed development.
- 2.2 The allocated housing development site known as Pickering's Farm is approximately 79 ha in size and is bounded by the A582 Penwortham Way to the west; immediately to the north by the Kingsfold area of Penwortham; to the east lies the West Coast mainline with Lostock Hall beyond and to the south is an area of Safeguarded Lane with Chain House Lane beyond. The site is currently occupied by a number of individual residential properties and farms in private ownership, the majority of which are accessed via Bee Lane, Flag Lane, Lords Lane, Moss Lane, and Nib Lane which bisect the site. The appeals proposals relate to parcels within the wider Pickering's Farm site that are within the appellants' control.

### Allocation and Importance of the Pickering's Farm Site

- 2.3 The appeals sites form part of Site EE, Pickering's Farm, identified on the SRLP Policies Map (CD5.3) associated with Policy C1. Paragraph 2.2 of the Main SoCG confirms that the appeals sites are in a sustainable location. Local services and amenities are located in the local shopping centres of Kingsfold (1.1km), Middleforth (1.9km) and Liverpool Road (3.4km).

- 2.4 As explained in Sections 3 and 4 of this Proof, the Pickering's Farm is a strategically important location and allocation in the CLCS (CD5.1) and the SRLP (CD5.2) respectively. The CLCS identifies 'Strategic Locations' under Policy 1: Locating Growth which sets out that 'some greenfield development is required at the South of Penwortham and North of Farington Strategic Location (Pickering's Farm site).' Pickering's Farm then forms one of three major sites for development allocated in the SRLP which are residential led.
- 2.5 SRLP Paragraph 6.4 (CD5.2) explains that "due to the size and importance of these (three) sites a comprehensive approach will be adopted that sets out the infrastructure needs and delivery mechanisms for the whole site and considers the relationship to existing communities". Specific policies are set out in the SLRP for each site. Summary tables on housing allocation on page 41 of the SRLP further reinforce the importance of the Pickering's Farm site, which is the largest allocation for housing providing almost 20% of the provision set out in the Local Plan.
- 2.6 The strategic allocation at Pickering's Farm is therefore central to the achievement of the Central Lancashire Core Strategy and the South Ribble Local Plan. Such an important site needs to be planned comprehensively and sustainably, with particular regard given to the delivery of infrastructure for the site and the surrounding area.

### **Housing Supply Contribution**

- 2.7 The appeals sites would generate market and affordable homes. The sites do not form part of the Council's five-year housing land supply. A contribution of 120 homes per annum is expected to commence in 2028/29 (see section 6 of this proof) with build-out of the allocation anticipated in 2037/38. In total the appeal sites would contribute up to 1,100 homes, 81.5% of the overall allocation capacity of 1,350 dwellings set out in the SRLP.

**Current Development Plan**

- 2.8 There is an up-to-date development plan in place and full weight is given (and agreed) to the SRLP and the CLCS. Significant conflict would arise from the appeal proposals with a range of important policies that lie at the heart of the development plan. As set out above the appeals sites are strategically important, as the majority of an important allocation in the SRLP. However, this does not mean that any development of the site is acceptable, as part of a planned and sustainable approach the development plan approach seeks to ensure that impacts and infrastructure are addressed for the site and surrounding area and community.

**Conflict with the Development Plan**

- 2.9 The proposed development does not satisfy important and fundamental policy requirements of the Development Plan. There is harm to Policy C1 - a masterplan, phasing and infrastructure delivery schedule and an agreed programme of implantation have not been agreed. None of the policy criteria have been satisfied. The Masterplan does not include the safeguarded land, it does not address the whole allocation. A comprehensive approach to this strategically important allocation is not put forward. This is a key emphasis and imperative of the Development Plan. Significant transport and design concerns have been identified about the masterplan.
- 2.10 Clarity and confidence that an appropriate development scheme can be achieved is required at this stage. There is a significant risk of delay and that by leaving issues to Reserved Matters and Conditions a materially different scheme could be brought forward. The key purpose of the plan led system is to provide certainty. The Council is not confident that a comprehensive and effectively master planned development will result for this strategically important site. Policy C1 requires confidence that all the key development and infrastructure elements fit together and can be delivered.
- 2.11 SRLP Policy A2 requires that land will be protected from physical development for the Cross Borough Link Road and criterion b establishes that this link road includes, "a road to be constructed through the major development site at Pickering's Farm as show

diagrammatically on the Policies Map”. The justification text to Policy A1 at Paragraphs 4.20 and 4.21 set out that the section of the Cross Borough Link Road through the Pickering’s Farm Allocation “will be implemented in accordance with an agreed phasing and infrastructure delivery schedule” and “will be provided through developer contributions and completed within an agreed timescale”.

- 2.12 Policy C1 of the SRLP requires the submission of “a phasing and infrastructure delivery schedule” (criterion b) and “an agreed programme of implementation in accordance with the Masterplan and agreed design code” (criterion c). The appeals proposals do not meet these requirements of the Development Plan. In relation to criterion c of Policy C1 a programme of implementation has not been agreed with the Council and the phasing and infrastructure schedule does not ensure that the Cross Borough Link Road will be implemented through the Pickering’s Farm site.
- 2.13 The appeals proposals do not provide for, or ensure the delivery of, the strategic infrastructure of the Cross Brough Link Road. The link road is identified as essential infrastructure for the Pickering’s Farm strategic location and allocation site. Given the approach of the appellants, the cost associated with completing the CBLR will then be a burden on the remaining development parcels in the allocation, which represent only 18.5% of the total dwellings. This would create a major viability challenge for the remaining parcels of development land and call into question the delivery of the CBLR and the required upgrade to Bee Lane bridge across the West Coast Main Line. This is very likely going to result in the infrastructure not being brought forward on the grounds of viability.

### **Material Considerations**

- 2.14 The delivery of housing and fulfilling the national imperative to boost the supply of new homes as set out in the NPPF is the principal material consideration. The appeals proposals will deliver up to 1,100 homes and form most of a strategically important sites for the delivery of new homes in the Borough. Bringing the site forward will help to deliver the Local Plan and its planned approach to the growth of the Brough and strategic objectives SO 5 (first part) and SO 8 of the Core Strategy (CD5.1)

- 2.15 As is the case for most development proposals of this nature economic and social benefits would arise from the development of new homes. The planning statement for the appeals proposals (CD1.18) sets out that the proposals will support a number of economic benefits in terms of job creation and increased expenditure in the local economy. Social benefits include the provision of new homes and up to 330 affordable homes, a local centre with a range of provision, a two-form entry primary school and a mobility hub. In terms of environmental benefits, it is accepted that the developments will result in the provision of additional green infrastructure with associated net increases in biodiversity and publicly accessible open space.
- 2.16 The contribution to the housing supply and provision of affordable units would be beneficial. The estimated economic benefits are generic, some are temporary in nature, and some relate to funding for the Council. Net gains in biodiversity are expected from all development. Green infrastructure, biodiversity and open space gains are in effect largely mitigation measures.
- 2.17 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development (section 2, paragraph 7). Inclusive places, promoting the use of sustainable modes of travel and reducing the need to travel and good design are all key aspects of sustainable development (sections 8, 9 and 12 of the NPPF). Section 7 of this Proof draws together key concerns about these issues in relation to the appeal proposals, which do not represent sustainable development.
- 2.18 The NDG introduces ten characteristics to illustrate the Government's priorities for well-designed places, which include: "Movement - accessible and easy to move around." The NDG states that a well-designed movement network provides a genuine choice of sustainable transport modes and limits the impact of cars by prioritising and encouraging walking, cycling and public transport. The proposed development would conflict with the NDG, which seeks to reduce reliance upon the private car and to move away from car use for short journeys.
- 2.19 The reliance on a single access to the Major Road Network for the majority of the homes on the appeals site and the lack of direct or indirect delivery of the Cross

Borough Link Road to provide for local east-west movements also results in poor connectivity to the adjoining urban area – falling short of the requirements of the NPPF, NDC and Core Strategy strategic objectives SO 2, SO 3, SO 4 and the second part of SO 8 9 (that the delivery of sufficient new housing *should also be based on infrastructure provision, as well as ensuring that delivery does not compromise existing communities*). The scheme would be harmful because it would increase car dependency, with implications for greenhouse gas emissions, congestion on local roads, and social exclusion. Existing communities living within the appeal site would be compromised in terms of access and communities in the wider area impacted by the effects of the appeals proposals on the highway network.

### **Overall Conclusions**

- 2.20 The appeals are not in accordance with the Development Plan. There is very significant harm to fundamental policies of the Development Plan and to different policies. The appeals proposals would contribute to the delivery of housing, with some associated economic, social and environmental benefits. This material consideration does not overcome the conflict with the Development Plan. The appeals proposals would not result in the achievement of sustainable development, given the identified transport, design, and inclusion concerns about the appeals proposals.
- 2.21 The benefit of the main material consideration (the delivery of housing) is also tempered by the situation that the appeal sites do not form part of the Borough's five-year housing land supply and do not feature in the housing supply trajectory until 2028/29. There is not therefore an immediate need for housing to be provided at the appeal sites. Other sites in the Borough are providing this supply and the Council has a very healthy 13-year supply of deliverable sites.
- 2.22 Permission should not be granted because of conflict with the development plan. The planning analysis set out in section 7 demonstrates this conflict and explains the resulting harms. Material considerations do not indicate that the plan should not be followed. For the reasons set out above, I respectfully support the view that this appeal should be dismissed.