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**Planning, Design & Access Statement to accompany a
Full Planning Application for 99 residential dwellings at
Gradwells Farm, on land to the north of Copp Lane,
Great Ecclestone, Lancashire**

On Behalf of Baxter Homes Ltd

23rd July 2021

HV156



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Contents

1	INTRODUCTION	1
2	REQUIREMENTS AND OBJECTIVES OF NATIONAL POLICY	4
	Introduction	4
	Sustainable Development	4
	The Presumption in Favour of Sustainable Development.....	4
	Decision Taking	6
	Delivering a Sufficient Supply of Homes	6
	Achieving Well Designed Places.....	7
	Meeting the Challenge of Climate Change, Flooding and Coastal Change	7
	Conserving and Enhancing the Natural Environment	8
	Overall Conclusions in Relation to the NPPF.....	8
3	APPRAISAL OF THE EMERGING APPLICATION AGAINST THE PROVISIONS OF THE DEVELOPMENT PLAN	10
	Introduction	10
	The Development Plan in Wyre.....	10
	Strategic Policies	11
	Housing Policies	13
	Site Allocation Policies	14
	Core Development Management Policies.....	17
	Conclusion in Relation to the Development Plan	17
4	VEHICULAR ACCESS AND PEDESTRIAN/CYCLE CONNECTIVITY	19
5	DESIGN AND ACCESS STATEMENT	22
	Introduction	22
	National Design Policy.....	22
	Local Design Policy	23
	Accessibility and Transport.....	25
	Conclusion	25
6	KEY ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS OF THE APPLICATION PROPOSAL	26
7	THE PRINCIPAL MATTERS FOR WHICH THE LPA'S AGREEMENT IS SOUGHT	28

APPENDIX 1 - Correspondence between CFM Consultants and Lancashire County Council

1 INTRODUCTION

- 1.1 This Planning, Design & Access Statement has been prepared on behalf of Baxter Homes Ltd to accompany its full planning application for construction of 99 dwellings, and associated access and infrastructure, at Gradwells Farm, to the north of Copp Lane, Great Eccleston (see CFM Consultants' Site Plan BH/04667/005 Rev A, at 1:500 scale). The application site forms part of a wider allocation for mixed use development under Policy SA3/3 of the Wyre Local Plan, which was adopted in February 2019. The proposed vehicular, pedestrian and cycle access to the application site and, through connection to the Metacre spine road, to the wider SA3/3 allocation, is from Copp Lane (as shown in the aforementioned Site Plan). A high priority is given to the need for pedestrian and cycle connectivity with the wider allocation and, where possible, with the village centre, in line with Key Development Consideration 3 of Policy SA3/3.
- 1.2 The application site is located within the settlement boundary of Great Eccleston (as proposed to be extended), so that the application will be fully in accord with the development strategy set out in Policy SP1 of the Local Plan. As a consequence, the Local Planning Authority (the LPA) will no doubt agree that the principle of residential development on the application site has already been established through the development plan and masterplan processes, and that there is no need for this Planning, Design & Access Statement to overly concern itself with development management issues relating to such matters as ecology, flood risk, contamination, visual and landscape impact, heritage impact, transport impact and so on. These are all matters that have been considered within Section 2 of Part 1 of the Masterplan, approved in December 2019. As a consequence, we make brief reference only to:
- the Geo-Environmental Assessment Report, prepared by Brownfield Solutions Ltd;
 - the Extended Phase 1 Habitat Survey and Baseline Ecological Impact Assessment, prepared by Cameron S Crook & Associates;
 - the Flood Risk and Drainage Appraisal, prepared by Ironside Farrar;
 - the Site Investigation Report, prepared by Brownfield Solutions Ltd; and

- the Landscape and Visual Assessment Report by FPCR.
- 1.3 We have given full consideration to the two heritage assets located within, or adjacent to, the development plan area – the 17th Century Dovecot, which is a Grade II Listed Scheduled Monument and the Grade II Listed Pinfold – neither of which will be affected by the application proposal.
- 1.4 Nevertheless, Baxter Homes Ltd considers that it is important to explain how it proposes to secure connectivity between the various phases of the masterplan area for vehicles, pedestrians and cyclists, and to explain why the proposed access point is the most appropriate location for vehicular traffic access off Copp Lane. We will therefore emphasise that the Copp Lane access point, shown in Figure 4.6 of the Part 1 Masterplan, is merely indicative as a '*Potential vehicular access point*', as is the access point from Garstang Road.
- 1.5 The remainder of our Planning, Design & Access Statement is therefore structured as follows:
- **Section 2** provides a brief résumé of the key requirements and objectives of national policy, as set out in the revised NPPF of February 2019, and confirms that the application is consistent with its three overarching economic, social and environmental sustainability objectives.
 - **Section 3** provides our appraisal of the application against the relevant provisions of the Wyre Local Plan, adopted in February 2019, taking into account the Planning Inspectorate's report to Wyre Council of 27th October 2020, in relation to its Annual Position Statement of July 2020, and the Council's November 2020 response. This Section explains that the application is consistent with the development plan, considered as a whole, so that the application benefits from the presumption in favour of sustainable development incorporated in the revised NPPF and the presumption, under Section 38(6) of the Planning and Compulsory Purchase Act 2004, that determination will be made in accordance with the plan, unless material considerations indicate otherwise.

- **Section 4** describes how the site can be safely accessed by vehicular traffic off Copp Lane, with this access point serving as the point of entry for the spine road that would serve all parts of the allocation and link with the A586, as required by Key Development Consideration 2 of Policy SA3/3.
- **Section 5** provides our Design & Access Statement for the purposes of Article 9 (b) (i) in Part 3 of the *Town and Country Planning (Development Management Procedure) (England) Order 2015*.
- **Section 6** identifies a range of economic, social and environmental benefits of the application proposal, including its delivery of much-needed open market and affordable housing, and the promotion of environmentally-friendly travel by foot, bicycle and public transport.
- **Section 7** identifies the principal matters for which the LPA's agreement is sought.

2 REQUIREMENTS AND OBJECTIVES OF NATIONAL POLICY

Introduction

- 2.1 The latest changes to the NPPF were published in July 2021. The revised NPPF sets out the Government's planning policies for England and how these should be applied. Paragraphs 2, 12 and 47 of the revised NPPF continue to emphasise that planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 2 also confirms that the revised NPPF is a material consideration in planning decisions.

Sustainable Development

- 2.2 Paragraph 7 of the revised NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 then states that '*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives*'. Thus, the three overarching objectives are:

- an **economic** objective, to help build a strong, responsive and competitive economy;
- a **social** objective to support strong, vibrant and healthy communities; and
- an **environmental** objective to contribute to protecting and enhancing our natural built and historic environment.

The Presumption in Favour of Sustainable Development

- 2.3 Paragraph 10 of the revised NPPF confirms that '*...at the heart of the Framework is a presumption in favour of sustainable development*'. Paragraph 11 states that:

*'For **decision-taking** this means:*

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

- 2.4 The second decision-taking bullet point in Paragraph 11 of the revised NPPF only comes into force where there are no relevant development plan policies, or where policies of most importance for determining the application are out-of-date. Footnote 8 to Paragraph 11(d) confirms that relevant policies for determining a housing application will be out-of-date where the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites, using the appropriate buffer, as set out in Paragraph 74 of the revised NPPF.
- 2.5 In Wyre, however, the situation regarding policies for the supply of housing in the development plan has been somewhat clouded by the publication of the Report from the Planning Inspectorate of 27th October 2020, which concluded that: *'The Wyre Council APS, dated July 2020, does not demonstrate that the Borough has a five year housing supply'*. This reflects the Inspector's conclusion that 434 dwellings should be removed from the five year supply shown in the APS (including a reduction of 50 units at Great Eccleston), resulting in the supply falling to 4.94 years.
- 2.6 The Council's November 2020 response to the Inspector's Report suggests that, even if the Inspector's conclusions were accepted in full, there would be a housing land supply position of a minimum of 5.2 years, with a 5 per cent buffer. Nevertheless, even if the

Council can sustain this position, it is clear that the housing land supply situation in Wyre is very tight. As a consequence, the application proposal will clearly make a valuable contribution, within five years, and we trust that the Council will acknowledge this benefit in its planning balance exercise.

Decision Taking

- 2.7 There are two points to draw out from Section 4 of the revised NPPF. First, we emphasise the provisions of Paragraph 38, which states that:

‘Local Planning Authorities should approach decisions on proposed development in a positive and creative way... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision takers at every level should seek to approve applications for sustainable development where possible’.

- 2.8 Second, we emphasise the importance that the Framework places on pre-application engagement. In this respect, we confirm that representatives of Baxter Homes (CFM Consultants and Turner Lowe Associates) have been actively engaged with Officers of Wyre Borough Council and Lancashire County Council, in discussing the most appropriate and safest vehicular access point from Copp Lane. These discussions culminated in emails from the Team Lead for Highways and Transport at Lancashire County Council of 25th November 2020 and 28th April 2021, which, respectively, state that *‘The access arrangement to Copp Lane on your plan would be acceptable in principle’* and that *‘Your site has the potential to provide access to the adjacent site and through it to Garstang Road’* and that *‘The principle is acceptable’.*

Delivering a Sufficient Supply of Homes

- 2.9 Section 5 of the revised NPPF deals with the importance of delivering a sufficient supply of homes. Paragraph 60 states that:

‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it

is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay’.

- 2.10 We would hope that the Local Planning Authority agrees that the application proposal will make a valuable contribution to meeting housing requirements for various groups, providing, as it will, for both affordable and market housing and a variety of house types and sizes, including bungalows suitable for the elderly and disabled. Moreover, we have already identified the contribution that the application will make to the very tight housing land supply situation, which barely meets the five year requirement.

Achieving Well Designed Places

- 2.11 Paragraph 8b of the latest revision to the NPPF seeks to support the social objective of supporting strong, vibrant and healthy communities by, amongst other things, ‘...*fostering well designed, beautiful and safe places*’. Indeed, the new Paragraph 134 of the revised NPPF introduces a new test in stating that ‘*Development that is not well designed should be refused, especially where it fails to reflect 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*’. Indeed, the new Paragraph 128 of the revised NPPF calls on local authorities to maximise clarity about design expectations at an early stage and prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, whilst also reflecting local character and design preferences.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 2.12 Section 14 of the revised NPPF emphasises the need for the planning system to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. In this context, we note Ironside Farrar’s observation that the whole of the wider allocation is located within Flood Zone 1, which poses least risk in relation to flooding. We ask for confirmation, therefore, that the Local Planning Authority accepts that the application proposal passes the flood risk sequential test.

Conserving and Enhancing the Natural Environment

2.13 Section 15 of the revised NPPF emphasises that planning policies and decisions should contribute to and enhance the natural environment by, amongst other things:

- protecting and enhancing valued landscapes;
- recognising the intrinsic character and beauty of the countryside;
- maintaining the character of the undeveloped coast;
- providing for net gains for biodiversity;
- preventing new development from contributing to soil, air, water or noise pollution; and
- mitigating despoiled, derelict and contaminated land where appropriate.

2.14 In this context, we note that the Local Plan Inspector accepted that the SA3/3 allocation *'...does not have any significant landscape attributes'* and that *'... the area nearest the village is under construction so that change is already occurring'*. Indeed, we note that the Landscape and Visual Assessment by FPCR finds that *'The site and immediate context is not considered to be of particular scenic value. It is an area of improved pasture land, containing few features of intrinsic landscape interest... it is not a rare landscape type, with the existing hedgerows, trees and ponds not being unusual features or particularly important examples'*. Moreover, the listed Dovecote is located within a field which is to be kept free from development and is surrounded by tall hedges which will not be affected by the application proposal. Indeed, FPCR states that *'There are no important views from within the site which need to be preserved'*.

Overall Conclusions in Relation to the NPPF

2.15 The NPPF emphasises the role of the development plan as the statutory starting point in the consideration of planning applications, so that where the application accords with the development plan, considered as a whole (as per Rochdale, EWHC 650 (Admin)), it should be approved without delay, unless material considerations indicate otherwise.

- 2.16 The NPPF itself is a material consideration, to which significant weight should be given by the decision taker. In this context, we note that the NPPF emphasises the presumption in favour of sustainable development, which has three overarching dimensions – economic, social and environmental – which are mutually dependant, so that gains in each should be sought jointly and simultaneously. For the reasons set out in Sections 4 to 6 of this Planning, Design & Access Statement and elsewhere in the applicant’s support material, we consider that the application proposal will assist in meeting each of the three components of sustainability. Thus, we hope that the Local Planning Authority agrees that the application is fully consistent with the provisions of the NPPF.
- 2.17 In particular, we would emphasise that the application will assist a key objective of the NPPF, which is ‘*significantly boosting the supply of homes*’ by helping to deliver both market and affordable housing in a location where both types are needed, and by providing a variety of house types and sizes, including bungalows that will be suitable for elderly and disabled persons.

3 APPRAISAL OF THE EMERGING APPLICATION AGAINST THE PROVISIONS OF THE DEVELOPMENT PLAN

Introduction

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that:

'If regard is to be had to the Development Plan for the purpose of any determination to be made under the planning acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

3.2 The first test, and the statutory starting point is whether the application is *'in accordance with the plan'*, which is a phrase that has been the subject of debate in the High Court in the context of Section 54A of the Town and Country Planning Act 1990. In his Judgment of 31 July 2000 (R v Rochdale Metropolitan Borough Council ex parte Milne – EWHC 650 (Admin)), Mr Justice Sullivan (as he then was) concluded as follows:

'...I regard as untenable the proposition that if there is a breach of any one Policy in a development plan a proposed development cannot be said to be "in accordance with the plan" ...'

'For the purposes of Section 54A, it is enough that the proposal accords with the development plan considered as a whole. It does not have to accord with each and every policy therein' (our emphasis).

3.3 Thus, we seek confirmation of the Local Planning Authority (LPA)'s agreement that this seminal Judgment in Rochdale represents the appropriate approach to the statutory starting point in decision-making.

The Development Plan in Wyre

3.4 The development plan in Wyre comprises the Wyre Local Plan (2011 - 2031), adopted in February 2019, together with the Lancashire Minerals and Waste Development Framework, produced by Lancashire County Council. In considering the application proposal that we are dealing with, it is only the Wyre Local Plan which is relevant.

3.5 We consider that the policies of most relevance to the application fall into four groups, as follows:

- **Strategic Policies**, the most relevant of which are Policies SP1 (development strategy), SP2 (sustainable development), SP7 (infrastructure and development contributions) and SP8 (health and wellbeing);
- **Housing Policies**, the most relevant of which are HP1 (housing land supply), HP2 (housing mix), HP3 (affordable housing) and HP9 (green infrastructure in new residential developments);
- **Site Allocation Policies**, the most relevant of which is SA3/3 which identifies the land to the west of Great Eccleston as being a mixed use allocation, anticipated to provide for 568 dwellings and 1 hectare of employment land ; and
- **Core Development Management Policies**, the most relevant of which are CDMP2 (flood risk and surface water management), for which the Ironside Farrar report is relevant; CDMP3 (design), which will be dealt with separately in the Design & Access Statement; CDMP4 (environmental assets), for which the FPCR report is relevant; and CDMP6 (accessibility and transport), which will be dealt with in the Design & Access and Transport Statements that will accompany the application.

Strategic Policies

3.6 The first part of Strategic Policy SP1 sets out the overall planning strategy for the Borough, which is to be ‘...one of growth within environmental limits’. Thus, the first part of Policy SP1 explains that the overarching aim is to meet the housing needs of all sections of the community and raise economic performance, whilst minimising, or eliminating, net environmental impact.

3.7 The second part of Policy SP1 explains that the spatial approach in the Local Plan is one of sustainable extensions to the towns and rural settlements, in accordance with the settlement hierarchy incorporated in this part of the policy. Great Eccleston is identified as one of four Rural Service Centres, at the third level in the hierarchy. These Rural Service Centres are anticipated to provide for 18.5% of the Borough’s housing growth and

23.3% of its employment growth. In this context, it is noteworthy that the Local Plan Inspector concluded that the Policy SA3/3 allocation '*...would create a good balance of uses and a sustainable extension to the village*'.

- 3.8 The third part of Policy SP1 provides a commitment that the Local Plan will deliver a minimum of 9,200 dwellings and 43 hectares of employment land in the period 2011-2031. The fourth part of the policy then encourages much of the new development to be located within the settlement boundaries, defined on the adopted Policies Map. Thus, the application site, which is wholly within the extended settlement boundary of Great Ecclestone, is entirely consistent with the Development Strategy set out in Policy SP1.
- 3.9 The first part of Strategic Policy SP2 requires that all development should contribute positively to the overall physical, social, environmental and economic character of the area in which it is located, and the second part requires that all development should contribute to the continuation or creation of sustainable communities, in terms of its location and accessibility. Indeed, the third part of Policy SP2 encourages all of the sustainable objectives to be met, so that Policy SP2 is very much reflective of the NPPF's (the Framework's) presumption in favour of sustainable development.
- 3.10 The fourth part of Policy SP2 identifies the types of policies and proposals required to deliver sustainable communities, which, amongst others, are to:
- ensure housing provision to meet the needs of all sections of the community;
 - ensure accessible places and minimise the need to travel by car;
 - maximise the use of existing infrastructure and services;
 - reduce and manage flood risk; and
 - achieve safe and high quality local environments which promote health and wellbeing.
- 3.11 The fifth part of Policy SP2 requires that development proposals must not compromise the Borough's ability to improve the health and wellbeing of local residents. The final part of Policy SP2 requires that development proposals must demonstrate how they respond

to the challenge of climate change through appropriate design and by making the best use of resources and assets.

- 3.12 The only other strategic policy considered to be of potential relevance to the application by Baxter Homes is Policy SP7, which, like Policy SP2, seeks to make the best use of existing infrastructure. The third and fourth parts of Policy SP7 also refer to the need for developer contributions, via a planning obligation, towards infrastructure and affordable housing.
- 3.13 Finally, we should state that the application proposal will be designed to promote the health and wellbeing of local communities. We therefore seek the LPA's confirmation that a Health Impact Assessment, under the provisions of Policy SP8, will not be required.

Housing Policies

- 3.14 The introductory wording to Housing Land Supply Policy HP1 identifies an objectively assessed housing need (OAN) of 9,580 dwellings, over the period 2011 to 2031. However, Paragraph 7.1.2 acknowledges that the Local Plan cannot meet in full the OAN because of constraints primarily associated with highway capacity, flood risks and lack of deliverable developable land in Fleetwood and Cleveleys.
- 3.15 Thus, Policy HP1 states that provision will be made for a minimum of 9,200 net additional dwellings, which equates to at least 460 dwellings per annum. Interestingly, some 5,192 of the dwellings are on sites allocated under policies SA1, SA3 and SA4, including the site of the Baxter Homes application, as part of SA3/3. It is clear, therefore, that the application by Baxter Homes will assist in helping to meet the minimum supply and that the Council is heavily reliant on the allocated sites for meeting its five year supply.
- 3.16 Housing Policy HP2 deals with housing mix and requires that new housing development widens the choice of house types available in Wyre. The application proposal by Baxter Homes is fully consistent with this policy in that it meets the 30 per cent affordable housing requirement of Policy HP3 i.e. 27 of the 99 units will be affordable. Some of these affordable units will obviously be suitable for elderly people and those with restricted mobility, noting that the third part of Policy HP2 requires 20 per cent of dwellings within

developments of 20 dwellings or more to be suitable for such residents. Furthermore, CFM's Indicative Housing Layout drawing BH/04667/2001 Rev-A indicates a variety of house types, including a variety of different sized detached properties, semi-detached properties, terraced properties, apartments and bungalows.

- 3.17 We can confirm that our understanding is that Baxter Homes is willing to enter a Section 106 agreement to secure the delivery of 27 affordable units.
- 3.18 Housing Policy HP9 relates to the provision of green infrastructure in new residential developments that result in a net gain of 11 dwellings or more. The total green infrastructure requirement per 1,000 population is set out in the table within the first part of Policy HP9 and the second part of the policy sets out various factors that the Council will consider in determining the most appropriate type and means of open space provision. The third part of Policy HP9 suggests that the green infrastructure should be provided on-site if possible, but that the Council will accept a financial contribution towards off-site improvements where appropriate.

Site Allocation Policies

- 3.19 Policies SA1, SA2 and SA3 identify sites that are allocated for housing, employment and mixed use development, in order to meet the Local Plan's housing and employment requirements identified under Policies HP1 and EP1. Thus, Policy SA1 allocates 25 sites for residential development (but only including those sites which each have a capacity for 25 dwellings or more), and these sites are shown on the adopted Policies Map. These allocations are key to meeting the Borough's housing needs.
- 3.20 Paragraph 9.1.5 of the explanatory wording to the Site Allocation Policies states that there is a requirement for the preparation of a masterplan with regard to sites in Policies SA1 and SA3, where more than 50 dwellings are proposed and also in relation to the Hillhouse Technology Enterprise Zone under Policy SA4. This masterplan requirement is foreshadowed in the explanatory wording in Paragraph 4.1.20 of the adopted Local Plan, which asserts that *'In order to ensure sustainable growth which forms an integrated extension to settlements, the Local Plan requires that the development of large sites is*

delivered through a masterplan approach'. Indeed, Paragraph 4.1.23 of the explanatory wording identifies masterplans as being an essential element in the Local Plan strategy in terms of delivery of extensions to settlements of over 50 dwellings.

- 3.21 Paragraph 9.1.5 goes on to explain that the masterplan requirement '*... is in order to ensure that the land is comprehensively developed and where a particular site is on the edge of a settlement, as a whole, it relates and integrates with the existing settlement*'.
- 3.22 With this background in mind, we refer to the Key Development Considerations (KDCs) for the Land West of Great Eccleston allocation, under Policy SA3/3.
- 3.23 KDC 1 requires that the site be brought forward in line with a masterplan for the whole site and that: '*The masterplan must be agreed by the Local Planning Authority prior to the granting of planning permission for any part of the site*'.
- 3.24 The application by Baxter Homes incorporates approximately 17 per cent of the residential development capacity of the wider allocation, will not prejudice the prospects of the whole allocation coming forward in a comprehensive manner. Rather, the proposals being put forward by Baxter Homes will assist in the integration of all phases of the wider Masterplan area, with the Baxter site served by a vehicular access off Copp Lane that will form the first part of the spine road that serves all parts of the wider allocation, including the community hub (see CFM Drawing No.BH/04667/005 Rev A). Indeed, as discussed in Section 4, Baxter Homes is proposing to enter a non-ransom agreement with Metacre, that will ensure delivery of the vehicular, pedestrian and cycle access to the remainder of the allocation, prior to the occupation of any homes on Baxter's site.
- 3.25 KDC2 requires a through vehicular route from Copp Lane to the A586 (Garstang Road). In this context, it is noteworthy that the email from Lancashire County Council's Highways and Transport Officer of 25th November 2020 confirms that '*The access arrangement to Copp Lane on your plan would be acceptable in principle*' and that '*Your site has the potential to provide access to the adjacent site and through it to Garstang Road*'.

- 3.26 KDC3 requires that development should be supported by a landscape and green infrastructure framework incorporating pedestrian and cycle connectivity within and, where possible, outside the site, and, in particular, with the village centre.
- 3.27 KDC4 requires that the development should provide an organic extension to the village, as envisaged by the Local Plan Inspector.
- 3.28 KDC5 requires that residual surface water should drain into the River Wyre (near Cartforth Bridge) via Thistleton Brook and existing watercourses. In this context, we note the existence of the ditch, which forms the northern boundary of the Baxter Homes site, into which surface water will flow.
- 3.29 KDC6 notes that the site does not have any nature conservation designations, but that a project level Habitat Regulation Assessment (HRA) may be required. This should be a matter for discussion in the pre-application meeting.
- 3.30 KDC7 notes that the site is located within 3.5km of the Morecambe Bay European protected nature conservation site, and that homeowner packs explaining the sensitivity of Morecambe Bay will be required.
- 3.31 KDC8 requires that the wider allocation should include a new primary school, health centre, community hall and small convenience store, with the location of the facilities to be determined through implementation of the Masterplan.
- 3.32 KDC9 refers to the existence of the Dovecote Scheduled Monument and requires an appropriate buffer to protect its setting. In this context, we note Baxter's emerging application will not encroach onto the field in which the Dovecote is located (shaded green in Figure 5 of the Masterplan).
- 3.33 KDC10 relates to safety measures, necessitated by the overhead electricity structure, including pylons.
- 3.34 Finally, KDC11 requires account to be taken of the nearby Grade II Listed Buildings and the Public Right of Way that runs east to west through the site, to the north of Copp Lane. In this context, we confirm that the Baxter application will have no adverse impact on the

Listed buildings and that it will provide for pedestrian and cycle links with the existing Public Right of Way.

Core Development Management Policies

- 3.35 Ironside Farrar’s Flood Risk and Drainage Appraisal confirms that the allocation is fully consistent with the provisions of Policy CDMP2 (flood risk and surface water management).
- 3.36 In Section 5 we confirm that full compliance with CDMP3, which relates to design. In particular, we confirm that the development will not have an adverse impact on the amenity of occupants of surrounding, or nearby properties, and the application proposal will provide for a good standard of amenity for the occupants of the development itself.
- 3.37 The Local Plan Inspector has confirmed that the wider allocation does not have any significant landscape attributes. Moreover, no part of the application site is the subject of green infrastructure, or countryside area annotations under Policies CDMP4 and SP4, as confirmed by the adopted Local Plan Policies Map. As a consequence, the application clearly complies with Policy CDMP4 of the Local Plan.
- 3.38 The final Development Management Policy of relevance is CDMP6, which relates to accessibility and transport. In this context, we refer to the drawing prepared with the assistance of Turner Lowe Associates, that shows how all of the parameters, set down by the County Council’s representative, in his email of 25th November 2020, in relation to the vehicular access points, will be achieved. Moreover, the Transport Statement by Turner Lowe Associates confirms that the application site enjoys safe access by a variety of means of transport and is entirely consistent with Policy CDMP6.

Conclusion in Relation to the Development Plan

- 3.39 The application proposal from Baxter Homes will enhance the prospects of the whole allocation coming forward in a comprehensive and sustainable manner. Moreover, the proposal will deliver much-needed open market and affordable housing, and can be safely accessed by vehicular traffic off Copp Lane, in the position shown in CFM’s Drawing No. BH/04667/005 Rev-A. The application will provide for safe vehicular, pedestrian and

cycle linkages with the community hub and with the wider allocation. Thus, the emerging proposal is clearly consistent with the development plan, considered as a whole, so that Section 38 (6) of the 2004 Act therefore requires a permission, unless material considerations indicate otherwise.

4 VEHICULAR ACCESS AND PEDESTRIAN/CYCLE CONNECTIVITY

4.1 The importance of pedestrian/cycle and vehicular connectivity is a theme that is emphasised not only in the Part 1 Masterplan, but also in the Key Development Considerations (KDCs) that underpin the adopted Wyre Local Plan Site Allocation SA3/3, which covers land west of Great Eccleston. Thus, KDC2 requires a through vehicular route from Copp Lane to the A586 (Garstang Road), and KDC3 states that:

‘Development should be supported by a landscape and green infrastructure framework incorporating structured tree planting, on-site open space to include formal and informal play and pedestrian and cycle connectivity within and where possible outside the site and in particular with the village centre’ (our emphasis).

4.2 Thus, the Part 1 Masterplan seeks to build on the provisions of the Development Plan and sets out the overall vision as being:

‘To create an organic extension to Great Eccleston that is integrated into the existing village fabric in terms of design and layout, including pedestrian and cycle connectivity to key local facilities. The development will provide a mix of employment, retail and community uses to support the new growth. They will also enhance the sustainability of the village. It will contain a mix of integrated green spaces that will provide formal and informal recreation opportunities whilst creating a soft transition between the new development and surrounding countryside’.

4.3 In turn, the Masterplan sets the following objectives related to vehicular access and pedestrian/cycle connectivity:

- to create a sustainable extension to Great Eccleston which is integrated socially and physically with the existing village;
- to create a movement network for pedestrians and cyclists to promote safe connectivity with the village and surrounding countryside, taking the opportunity to enhance and improve access to existing Public Rights of Way;

- to ensure the safe movement of traffic and other road users, which is fully integrated with the movement network for pedestrians and cyclists; and
- to produce a high quality and safe public realm that includes landscaping and green infrastructure, serving both the future residents and the wider village.

4.4 Further guidance is then given in the Access and Movement Masterplan. This section confirms that a key objective of the Masterplan is to promote the efficient movement of residents, employees, visitors and goods through the site and to promote connectivity within the existing village and wider PRow network. This suggests that the development should have a hierarchy of streets, including the spine road that will connect Copp Lane with the A586, which should be suitable for a bus route and secondary vehicular routes to provide circulation throughout the site.

4.5 However, whilst Baxter Homes Ltd is supportive of the overall vision and key objectives of the Masterplan, it is concerned that the Masterplan does not incorporate the necessary delivery mechanisms, in that it does not incorporate a commitment to prevent ransom strips between adjoining landowners that would frustrate pedestrian/cycle/vehicular connectivity throughout the Masterplan area and linkages with the surrounding urban area. Thus, in order to ensure that connectivity is achieved, there may be a requirement for Section 106 obligations which require connectivity with the land controlled by Baxter Homes, within a specified timescale, and which enforce a restriction on the occupation of dwellings constructed pursuant to any planning permission until the vehicular, pedestrian and cycle linkages have been constructed to the necessary standards. Indeed, representatives of Baxter Homes Ltd have made this suggestion to planning officers of the Council by way of an email dated 20th November 2020, addressed to Mr Len Harris.

4.6 Our client's advisors, CFM Consultants and Turner Lowe Associates, have, for some time, been in correspondence with the relevant Highways and Transport Officers at Lancashire County Council relating to pedestrian, cycle and vehicular connectivity. Relevant correspondence is contained in Appendix 1 of this Planning, Design & Access Statement.

4.7 The first of the relevant emails is from CFM Consultants to Mr Glenn Robinson, dated 3rd September 2020. This email attached an initial site layout plan for the land which is in the

control of Baxter Homes. This layout plan shows a vehicular junction with Copp Lane, which is in a different position to the indicative access point shown on the Masterplan, but with a suggestion that CFM's proposal represents a better and safer solution. The email also confirms that Baxter Homes can link through with the wider site within the option land. This first email of 3rd September 2020 was followed up with a further email, dated 29th October 2020, which attached a sketch plan as to how the main access road into the Baxter Homes land would link with the central area of the Masterplan allocation.

4.8 A reminder email from CFM Consultants was then sent on 19th November 2020 and this elicited the response from the County Council in its email of 25th November 2020. Thus, in this response, the County Council's Highways and Transport Officer states that:

- *'the access arrangements to Copp Lane on your plan would be acceptable in principle';*
- *'to serve as access to the main site with access through to Garstang Road, the road would need to be 6.0 to 6.5 metres wide the 6 - 10 metre radii and the visibility display of 2.4m x 43m, all of which can be provided in the land control';*
- *'for us to accept an access with shorter sightlines, a traffic calming scheme would need to be provided – this is the route that the adjacent site are taking with their application which has all matters reserved';*
- *'our preference would be a standard simply priority junction without the need to provide traffic calming - however, the approach taken by the adjacent landowner is not one where we could defend a highway objection at appeal';* and that
- *'your site has the potential to provide access to the adjacent site and through it to Garstang Road'.*

4.9 It is clear from this response, therefore, that the access point to Copp Lane proposed by Baxter Homes Ltd is preferable in highway design and safety terms to the indicative access point shown on the Masterplan, which would require traffic calming.

5 DESIGN AND ACCESS STATEMENT

Introduction

- 5.1 This is a full planning application for residential development of 99 dwellings, with the access provided off Copp Lane. The application site forms part of mixed-use allocation SA3/3, as shown on the Policies Map of the adopted Wyre Local Plan. However, the application proposal will provide for only around 17% of the overall residential capacity identified for the allocation, which amounts to 568 dwellings. The application site is located within the new settlement boundary for Great Eccleston, so that it is fully compliant with the overall planning strategy for the Borough, set out in Policy SP1 of the adopted Local Plan.
- 5.2 Once completed, it is intended that the application site will provide for 72 market dwellings and 27 affordable dwellings, with a wide range of house types on offer, including detached and semi detached dwellings and bungalows and a small number of terrace and apartment properties. As a consequence, the proposal provides for 34 two-bed houses, 29 three-bed houses and 36 four to five-bed houses, therefore providing for a very wide range of housing needs.
- 5.3 The application proposal is accompanied by this Planning, Design & Access Statement and a Transport Statement, prepared by Turner Lowe Associates.

National Design Policy

- 5.4 Paragraph 126 of the very recently revised NPPF introduces Section 12, with the statement that *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*.
- 5.5 Paragraph 130 then goes on to state that planning policies and decisions should ensure, amongst other things, that developments:
- a) will function well and add to the overall quality of the area...;

- 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...;
- d) establish or maintain a strong sense of place...
- 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; and
- f) create places that are safe, inclusive and accessible and which promote health and wellbeing with a high standard of amenity for existing and future users...

5.6 Paragraph 134 then makes the important statement that:

‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵², 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.’*

5.7 Having set out the provisions of the recently refreshed national policy, it is important to emphasise the application proposal is entirely in line with the approved Masterplan, so that all of these national design principles have been carefully reflected at the local level.

Local Design Policy

5.8 Policy CDMP 3 of the adopted Wyre Local Plan states that:

'All development will be required to be of a high standard of design and appropriate to the end use. Innovative design appropriate to the local context will be supported and will be expected to demonstrate an understanding of the wider context and make a positive contribution to the local area. Development will, in particular, be assessed against the following criteria:

a) All development must be designed to respect or reinforce the character of the area having regard to issues of density, siting, layout, height, scale, massing, orientation, and use of materials.

b) Development will be required to create or make a positive contribution to an attractive and coherent townscape both within the development itself and by reference to its integration with the wider built environment having regard to the pattern and design of internal roads and footpaths in respect of permeability and connectivity, car parking, open spaces, landscaping, and views into and out of the development.

c) Development must not have an unacceptably adverse impact on the amenity of occupants and users of surrounding or nearby properties and must provide a good standard of amenity for the occupants and users of the development itself.

d) Development must create safe and secure environments that minimise the opportunities for crime and promote community safety.

e) Adequate provision must be made in all new developments to enable the effective and efficient management and removal of domestic or commercial waste.

f) Development must, where appropriate, ensure that vehicular access is provided to the boundary with any adjacent land so that the ability to develop such land is not prejudiced or prevented'.

- 5.9 The Proposed Site Plan shows that an appropriate layout that accommodates a number of different house designs, sizes and tenures can be accommodated at the site whilst maintaining the character of the area. Quality materials for the construction of the dwellings as well as quality landscaping, surface materials and walls and fences, would be

used to ensure a qualitative development that has regard to the character and quality of the area.

- 5.10 The development will be in character with the immediate locality and will be of a high standard of design. Moreover, the proposed development is fully reflective of the local context that has been set by the Land to the West of Great Eccleston Masterplan and its appearance will be appropriate having regard to the local context. The proposal is therefore considered to comply with the requirements of CDMP 3.

Accessibility and Transport

- 5.11 The application proposal has been designed to be fully consistent with the accessibility and transport requirements of Policy CDMP6 of the adopted Local Plan. Indeed, the position of the proposed access on Copp Lane has been confirmed to be in the safest location on Copp Lane and affords accessibility by all modes of travel. Furthermore, the on site roads have been designed to link in with the spine road being delivered by Metacre and are suitable for buses, therefore affording public transport linkage between Copp Lane and Garstang Road.
- 5.12 The submitted Transport Assessment submitted by Turner Lowe Associates confirms the accessibility of the site by a range of modes of transport, providing safe access to services and facilities in the immediate vicinity of the wider site allocation.

Conclusion

- 5.13 The Design and Access issues related to this application proposal are fully compliant with the aforementioned National and Local Policies and with the principles established in the approved Masterplan for the Land West of Great Eccleston.

6 KEY ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS OF THE APPLICATION PROPOSAL

6.1 The Local Planning Authority (LPA) should give substantial weight to the economic, social and environmental benefits of the application proposal in determining this planning application. These benefits include:

- i) the delivery of much-needed open market and affordable housing, and a mix of house types and sizes, that will be suitable for a wide range of households, including those with elderly or disabled occupiers;
- ii) the contribution to the Council's five year housing land supply position, which is currently perilous and at just 4.94 years, according to the Planning Inspectorate's report to the Council of 27th October 2020;
- iii) the creation of a substantial number of construction jobs and promotion of supply chain multiplier benefits;
- iv) the substantial contribution that the application will make to the delivery of the wider masterplan area through the facilitation of vehicular, pedestrian and cycle linkages and the provision of a new vehicular access on Copp Lane that will enable the Baxter Homes development to proceed in tandem with the Metacre controlled land;
- v) the appropriate contribution to open space and green infrastructure which amounts to approximately 0.3 ha (as shown on CFM's Proposed Site Plan Drawing No. BH/04667/005 Rev-A) that will be secured by means of a condition on the full planning application, as required by KDC 3 of Allocation SA3/3;
- vi) the appropriate contributions towards improvements to existing watercourses, as required by KDC5 of Allocation SA3/3;
- vii) compliance with a whole raft of strategic, housing, site allocation and core development management policies in the relatively recently adopted Wyre Local Plan, thereby contributing to the Government's plan-led approach;

- viii) the safeguarding of all of the hedgerows and all of the trees with a lifetime of more than ten years that are located on the periphery of the application site;
- ix) provision of information packs to new residents, so as to minimise any disturbance impacts on the coastal designated sites;
- x) the promotion of environmentally-friendly modes of travel, by foot, bicycle and public transport; and
- xi) the creation of a well-designed, safe and attractive residential environment.

7 THE PRINCIPAL MATTERS FOR WHICH THE LPA'S AGREEMENT IS SOUGHT

7.1 For all the reasons set out in this Planning, Design & Access Statement, the Local Planning Authority (the LPA) is asked to agree that:

- i) the principle of residential development on the application site has already been established through the development plan process;
- ii) the approval of Part 1 and Part 2 of the Masterplan for Land to the west of Great Ecclestone means that it is appropriate to submit a full planning application;
- iii) the seminal High Court Judgment of 31st July 2000 in the case of *R v Rochdale Metropolitan Borough Council, ex parte Milne – EWHC 650 (Admin)* represents the appropriate approach to the statutory starting point in decision-taking;
- iv) the application proposal is consistent with the development plan, considered as a whole, so that the application will benefit from the presumption in favour of sustainable development incorporated in the revised NPPF and the presumption, under Section 38(6) of the Planning and Compulsory Purchase Act 2004, that determination will be made in accordance with the plan, unless material considerations indicate otherwise;
- v) the Local Plan policies of relevance to the emerging application fall into four groups, as follows:
 - **Strategic Policies**, the most relevant of which are Policies SP1 (development strategy), SP2 (sustainable development), SP7 (infrastructure and development contributions) and SP8 (health and wellbeing);
 - **Housing Policies**, the most relevant of which are HP1 (housing land supply), HP2 (housing mix), HP3 (affordable housing) and HP9 (green infrastructure in new residential developments);

- **Site Allocation Policies**, the most relevant of which are SA3 (mixed use development) and SA3/3 (which specifically relates to the allocation to the west of Great Eccleston); and
 - **Core Development Management Policies**, the most relevant of which are CDMP2 (flood risk and surface water management); CDMP3 (design); CDMP4 (environmental assets); and CDMP6 (accessibility and transport);
- vi) the need, or otherwise, for a project level Habitat Regulation Assessment (HRA), as mentioned in KDC6 of Policy SA3/3, will be a matter for discussion;
- vii) the LPA accepts that the application proposal passes the flood risk sequential test;
- viii) the LPA will give substantial weight to the economic, social and environmental benefits of the emerging application proposal, in determining our client's application and, in particular, to the delivery of much-needed open market and affordable housing; and that
- ix) the application site can be safely accessed by vehicular traffic off Copp Lane (in the Proposed Site Plan, shown in CFM Drawing No. BH/04667/005 Rev A) and that it will provide safe pedestrian and cycle linkages with the community hub and with the wider allocation.

7.2 Finally, the applicant asks that the LPA gives early consideration to the need to ensure ransom-free connectivity between the land controlled by Baxters and the adjoining parts of the Masterplan area, within a specified timescale, and the potential need for Section 106 agreements that restrict the occupation of dwellings until such ransom-free linkages are secured.



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