The Planning Inspectorate

Appeal Decision

Inquiry opened on 17 April 2018

Site visits made on 3, 14 & 15 May 2018

by Richard Clegg BA(Hons) DMS MRTPI

an Inspector appointed by the Secretary of State for Housing, Communities and Local Government

Decision date: 4th February 2019

Appeal Ref: APP/M2325/W/17/3179277
Land to the south-east of Moss Side Lane, Wrea Green, PR4 2PE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Mactaggart & Mickel against the decision of Fylde Borough Council.
- The application Ref 16/0619, dated 14 August 2016, was refused by notice dated 11 January 2017.
- The development proposed is approximately 50 dwellings accessed from Moss Side Lane, with associated open space and landscaping.
- The inquiry sat for 12 days: 17-20 & 24-27 April and 1-4 May 2018.

Decision

1. The appeal is dismissed.

Procedural matters

2. This appeal is one of four concerned with proposed residential development at Wrea Green, each of which was considered at the same inquiry. The four appeals are:

A	3179277	Land to the south-east of Moss Side Lane	Approximately 50 dwellings
B	3179809	Land west of Bryning Lane	41 dwellings
C	3176410	Land adjacent 53 Bryning Lane	20 dwellings
D	3181216	Land west of The Brooklands	48 dwellings

3. A pre-inquiry meeting was held to discuss procedural and administrative arrangements relating to the inquiry. At that meeting, it was agreed that the Appellants would present a joint case in respect of sustainability in relation to Wrea Green and planning policy, common highway matters (the effect on the junction of Lytham Road and Church Road, Warton), and housing land supply. Evidence from the Borough Council and other parties on these topics also

addressed all four appeals. Accordingly each of my decisions includes common sections covering those topics. Other topics were addressed separately at the inquiry in respect of the individual appeals. A common set of core documents (CDs) was prepared for the inquiry. Similarly the lists of inquiry appearances and documents are common to each of the four decisions.

4. Appeal A was submitted in outline form, with approval sought for access at this stage. An amended access plan was included with the statement of common ground for appeal A[1], which showed 2.4m by 50m visibility splays and certain detailed changes including an increase in width of the access road, and a crossing point there replacing those on each side of the junction on Moss Side Lane. Following discussion at the inquiry about the provision of a footway link along Moss Side Lane, the Appellant submitted a further revised access plan, which includes a narrower footway than originally envisaged extending to the north-east of the site frontage[2]. Other parties had the opportunity to comment on the access arrangements and footway link to site A at the inquiry, and I am satisfied that no prejudice would be caused by taking into account the latest revised access plan.

5. A unilateral undertaking was submitted at the inquiry in relation to appeal A (Document APPA1). It makes provision for affordable housing, and for financial contributions towards highway works in Wrea Green and Warton, and towards public realm improvements.

6. In July 2018, after the inquiry had closed, the Government published the revised National Planning Policy Framework (NPPF). Subsequently the Government published new and updated chapters to Planning Practice Guidance (PPG) and the Office for National Statistics published the 2016-based household projections in September, and in October the Borough Council adopted the Fylde Local Plan to 2032 (the Local Plan). Accordingly the Appellants for each of the four appeals, the Borough Council, the Community Association for the Protection of Wrea Green (CAPOW), Ribby-with-Wrea Parish Council and Bryning-with-Warton Parish Council were given the opportunity to comment on the implications of these documents for their respective cases.

Main Issues

7. Reason for refusal No 4 expressed concern about the nature of the access arrangements to the site, and in its statement of case the Borough Council referred to an adverse impact on the junction of Lytham Road (the A584) and Church Road in Warton and on the capacity of Bryning Lane, which runs south from Wrea Green and becomes Church Road in Warton. Subsequently, in the statements of common ground in respect of appeal A and Lytham Road/Church Road, Warton (CDs11.4 & 11.3), it was agreed that there were no highway objections to the proposal. However objections on highway grounds have been made by local representatives, CAPOW, and local residents.

8. Reason for refusal No 5 is concerned with affordable housing and certain financial contributions. The Local Education Authority has reviewed the requirements for school places, and does not seek a contribution for either the primary or secondary sectors (CD18.6). Contributions towards public realm

[1] CD11.4, Appendix C.
[2] Document APPA5.

enhancements and transport measures are provided for by planning obligations (above, para 5).

9. Accordingly, I consider that the main issues in this appeal are:

   (i) Whether Wrea Green is a sustainable location for the scale of development proposed.

   (ii) The effect of the proposed development on the character and appearance of the area.

   (iii) The effect of the proposed development on traffic movement and highway safety.

   (iv) The extent of housing land supply in Fylde.

Planning policies

10. The Development Plan includes the *Fylde Local Plan to 2032*[3], which was adopted in October last year. The following policies of the Local Plan are of most relevance in this appeal.

11. Policy S1 sets out a settlement hierarchy in which Wrea Green is included in the third level: Tier 1 – Larger Rural Settlements. Within the rural areas, development is to be restricted to the larger and smaller rural settlements, except where allowed by policies concerning the Green Belt, areas of separation, and the countryside.

12. Under Policy DLF1, most new residential and employment development, including 90% of new homes, is intended to take place at four strategic locations. The non-strategic locations comprise the local service centre of Freckleton, and the Tier 1 and Tier 2 rural settlements: here 10% of new homes are expected to be located. Policy SL5 identifies development sites outside the strategic locations: six sites at Wrea Green with a combined capacity of 246 dwellings are listed. None of the four appeal site is included in this list. Policy GD1 provides for settlement boundaries: the main part of the appeal site is outside the settlement boundary for Wrea Green, and in a countryside area as shown on the policies map[4]. Development opportunities in the countryside are set out in Policy GD4, and none of the categories listed covers the appeal proposal. Policy GD7 seeks to achieve good design in development: amongst other requirements proposals should conserve and enhance the historic environment, be sympathetic to surrounding uses and occupiers, avoid demonstrable harm to visual amenity, make a positive contribution to the character and local distinctiveness of the area, protect existing landscape features, and not prejudice highway safety and the efficient and convenient movement of highway users.

13. Policy H1 is concerned with housing delivery, and sets an annual minimum requirement of 415 additional dwellings for the plan period of 2011-2032. Part c of the policy specifies that calculations concerning the five years supply of housing land are to be undertaken using the Liverpool method. Policy H2 seeks a minimum net density of 30 dwellings per hectare (dph), and that proposals should provide a broad mix of homes, including accommodation for the elderly. All market housing schemes of 10 or more dwellings are required to provide

[3] Document LPA13, Appendix B.
[4] The appeal site includes a short length of Moss Side Lane, part of which is within the settlement boundary.

affordable housing/ starter homes at a level of 30% unless viability testing demonstrates that this provision would prevent delivery of the development (Policy H4). In most cases affordable housing should be provided on-site.

14. Policy ENV1 requires that development has regard to its visual impact within its landscape context, and landscape features should be conserved and wherever possible enhanced. The northern edge of the main part of the appeal site abuts Wrea Green Conservation Area[5]. Proposals affecting the setting of any conservation area should conserve or enhance those elements which make a positive contribution to its special character and appearance and setting (Policy ENV5). Policy INF2 specifies that, subject to viability, development will normally be expected to contribute towards the mitigation of its impact on infrastructure, services and the environment. A series of measures to enhance sustainable transport choice are set out in Policy T4.

15. In 2012, the Parish of Ribby-with-Wrea, which includes Wrea Green, was designated as a neighbourhood plan area. However the statement of common ground on planning policy and sustainability explains that no substantial work has been undertaken on the preparation of a plan.

Reasons

Sustainability of Wrea Green for the scale of development proposed

16. Wrea Green lies in the countryside, about 2km south-west of Kirkham, 3.6km to the north of Warton, and 6.9km north-east of Lytham, all of which are larger settlements. It is predominantly residential in nature, but also includes a small industrial estate adjacent to the railway. A number of facilities and services are located in Wrea Green, including a primary school, a convenience store, and a public house. About 1.5km to the east is the Ribby Hall holiday and leisure complex where certain leisure facilities, food and drink outlets, and a convenience store are open to the wider public.

17. The development strategy of the recently adopted Local Plan explains that most development is expected to take place at four strategic locations, but, under Policy SL5, it also provides for development to take place elsewhere, including at Wrea Green. Wrea Green is identified as a larger rural settlement, in the third level of the hierarchy, and the settlement boundary is more extensive than the limits of development of the former Local Plan[6], including several sites which have come forward for housing in recent years. However the land on the appeal site where residential development is proposed has not been included. It is part of a countryside area, and the proposal for housing would conflict with Policy GD4 which provides for a limited range of development opportunities in such locations. The strategy which underpins the Local Plan provides some opportunities for proposals in local service centres and rural settlements, but the focus for new development is on the key service centres and the strategic locations for development. That approach is consistent with the NPPF, which at paragraph 103 makes clear that significant development should be focussed on locations which are, or can be made, sustainable. The Local Plan envisages around 100-150 dwellings coming forward in larger rural settlements over the 21 years of the plan period[7]. In

[5] A plan of the conservation area is at CD19.5.
[6] The proposals map for the Fylde Borough Local Plan (as altered) is at Document G4.
[7] Justification to Policy SL5, para 6.21.

Wrea Green 253 dwellings have already come forward since 2011[8], well in excess of the number anticipated in the Local Plan. Whilst there is no ceiling on the number of dwellings which could be built at the settlement, it is clear that it is expected to reflect the position of Wrea Green in the development strategy.

18. The number of additional dwellings for tier 1 rural settlements referred to in the Local Plan is not an indication of their capacity for development. In response to my question, the Borough Council's policy witness explained that the number is derived from the distribution of the 10% of new homes intended to come forward outside the strategic locations (above, para 12). The four strategic locations where development is intended to be focussed include key service centres and local service centres. In the Local Plan, the justification to Policy S1 explains that key service centres include a range of housing and employment opportunities, together with facilities and services which serve a wide area, and good public transport links or the potential to develop such links. Local service centres are recognised as providing services for nearby rural settlements, and also as being well placed to provide for future local housing and employment needs. Focusing most new development in the strategic locations is consistent with the economic, social and environmental dimensions of sustainable development, as referred to in paragraph 8 of the NPPF. Accordingly only a limited level of development is distributed between the non-strategic locations identified in the Local Plan.

19. Policy DLF1 refers to the broad distribution of development, seeking to direct around 7,845 homes (90%) to strategic locations and around 870 homes (10%) to non-strategic locations. This form of words allows a degree of flexibility, as advocated by the Local Plan Inspector[9]. I note also that in the Local Plan's performance monitoring framework, indicator 4 has a trigger for action when the number of dwellings in non-strategic locations exceeds 15%. The Appellants have calculated that the total of about 159 dwellings from the four appeals would represent 1.8% of the overall minimum housing requirement, and result in 11.6% of housing occurring in non-strategic locations[10]. More significantly, they would also represent 18.3% of the level of development intended for non-strategic locations, with the number of dwellings in appeal A itself representing 5.7%. The sites outside the strategic locations, identified in Policy SL5 (and including land in Wrea Green), have a combined capacity of 933 dwellings, which slightly exceeds the 10% level and thereby already applies a degree of flexibility to the 90%/ 10% split in respect of the location of residential development.

20. The number of dwellings already committed in Wrea Green since 2011 markedly exceeds the indicative range for tier 1 settlements in the Local Plan (above, para 17). The appeal proposal would add about 50 dwellings, and if all of the appeals before me were allowed, about 159 additional dwellings would be provided. Those figures would result in the total number of new dwellings exceeding the upper end of the range by about 100% and 175% respectively. These amounts of development are more suited to a higher level than a tier 1 rural settlement.

[8] The table on page 11 of CD20.2 lists residential commitments at Wrea Green since 2011. The slightly lower figure of 246 dwellings in the table on page 3 of CD11.1 excludes sites accommodating fewer than five dwellings.
[9] Document LPA13, Appendix D para 40.
[10] Document APPJ14 para 3.25.

21. I have considered the availability of facilities and services for Wrea Green and the likely implications in terms of travelling. Facilities and services are identified in the statement of common ground on planning policy and sustainability (CD11.1) and the Settlement Hierarchy Background Paper (CD3.12) assesses the relative availability of facilities and services as part of the preparation of a settlement hierarchy for the Local Plan. There are several key services in Wrea Green, including a convenience shop, a post office (within the shop), a primary school, and a community facility.

22. There was particular discussion at the inquiry concerning the school and the shop. It is common ground between the main parties that the primary school is within walking distance of each of the appeal sites. The school is full, with the number on roll (152) slightly exceeding the capacity for 150 pupils[11]. However Lancashire County Council, as the Local Education Authority, does not seek a financial contribution towards additional places, since one of the existing schools taken into account in the surrounding area is projected to have a surplus of 95 places within the next five years[12]. This school is at Warton, and is over 3km from the appeal site. Having regard to the admission arrangements for the school in Wrea Green and place of residence of pupils, the Appellants argue that the appeal proposals need not lead to children of primary school age travelling to another settlement. A statement entitled *School Information* on the School's website explains that about half of the 156 pupils are from beyond the local community, including Warton, Kirkham, Blackpool, Preston and Lytham (Document APPJ2). The School's Admission Arrangements give priority to children whose parents live within the ecclesiastical parish of Ribby-cum-Wrea (which includes Wrea Green and the surrounding countryside) over those whose parents live outside the parish[13]. It is suggested that children from the appeal sites, and existing housing commitments in Wrea Green, would displace children from further afield.

23. The information referred to by the Appellants is not sufficiently robust to enable any great reliance to be placed on this suggestion. I note that the number of children of primary school age recorded in Ribby-with-Wrea Ward in the 2011 Census[14] appears broadly consistent with the reference on the school website to the proportion of pupils from the local community. However the census ward is less extensive than the ecclesiastical parish and may, therefore, not fully reflect the number of local pupils. More fundamentally, the website statement is undated and simply gives the positon at a point in time. It is not clear how recent the statement is, nor whether the proportion of pupils from beyond the local community reflects a continuing situation. Fourteen primary school age children are expected to be generated by appeal A, and a further 29 by the other three proposals[15]. Wrea Green school is fully subscribed, and I do not consider that the information before me indicates that there would be scope for all the additional children from the appeal proposals to be accommodated there in place of children from beyond the ecclesiastical parish. I anticipate that the appeal proposal would result in trips being made to primary schools outside Wrea Green.

[11] CD20.2, table on pages 52 & 53.
[12] The LEA's assessment is in the email at CD18.6.
[13] The Admission Arrangements for 2019 and a map of the ecclesiastical parish are Documents APPJ2 and G9 respectively.
[14] CD16.9 – Ribby-with-Wrea 2011 Census Ward – Local Area Report, page 4 - table on age structure.
[15] CD20.2, table in para 13.57.

24. The shop in Wrea Green sells a range of food and other convenience items and also accommodates the post office. As the Borough Council points out, the site is constrained, and there is no clear opportunity to expand the premises. As a small convenience store, I expect that the shop provides a top-up service and that it does not account for main shopping trips. Indeed, I note that the Settlement Hierarchy Background Paper assesses local stores in rural settlements and accessibility to supermarkets separately. There is no substantive evidence that the role of the existing shop as a convenience outlet would be adversely affected by additional housing, but more shopping trips for other purposes would inevitably be made outside the settlement.

25. Certain additional facilities and services are available at Ribby Hall holiday and leisure complex. As a convenience store, food and drink outlets, and pre-school are present in Wrea Green, these facilities do not extend the variety of provision. A swimming pool, health club and gym are the principal facilities at Ribby Hall which would augment those in the settlement itself. Ribby Hall is physically separate from Wrea Green. Whilst the facilities there are within cycling distance of the appeal site, they are beyond the preferred maximum walking distance of 1.2km for purposes other than town centres, commuting, school and sight-seeing, set out in the Guidelines for Providing for Journeys on Foot[16]. Moreover, outside the settlement, a large part of the route along Ribby Road is not overlooked. Particularly outside the hours of daylight, the nature of this route is unlikely to encourage trips on foot.

26. There is a small industrial estate at Wrea Green, and there are other employment opportunities available at Ribby Hall. I agree with the main parties that most journeys to work for existing and future residents will involve travelling outside the settlement. Journeys by future residents out of Wrea Green would also be required for secondary education, shopping (other than local convenience requirements), and to access a wider range of services.

27. The nearby settlements of Kirkham, Wesham and Warton are within cycling distance of Wrea Green. Kirkham is a key service centre, and both Wesham and Warton are local service centres. There are employment opportunities at these settlements, including the major BAE Systems works at Warton, and access to the rail network is available from Kirkham & Wesham station.

28. There are two main bus routes which serve Wrea Green. The No 61 runs every 30 minutes between Blackpool and Preston on weekdays and Saturdays, with the frequency reducing to hourly in the evenings and on Sundays. This service also calls at Kirkham centre and Kirkham & Wesham rail station. The No 76 operates on a two hourly frequency between Poulton and Lytham, calling at Warton, with some journeys extending to Blackpool[17].

29. Given the limited range of facilities, services and employment opportunities in Wrea Green, I anticipate that many trips made by future residents of the appeal site would be to destinations beyond the settlement. It is clear that opportunities exist to travel by bus to larger settlements from Wrea Green, but the Appellant's transport statement indicates that a significant proportion of journeys would be made by car. It envisages that the 50 dwellings proposed

[16] CD10.3, table 3.2.
[17] Timetables for the 61 and 76 bus services are in Document APPJ1.

would generate 31 vehicle trips in the morning peak period and 29 vehicle trips in the afternoon peak[18].

30. The Settlement Hierarchy Background Paper only takes account of one of the two bus services which now serve Wrea Green. If the No 61 is included in the assessment, the additional two points would place Wrea Green level with Freckleton, which is a local service centre. The outcome of the background paper is a relative ranking of settlements, and it would be inappropriate to review bus services in respect of just one of the 19 settlements assessed. In any event, the presence of a cluster of shops, a surgery, and a library all indicate that Freckleton is a higher order settlement than Wrea Green. I have also considered the position of Wrea Green relative to Warton. Warton has a lower aggregate score than Wrea Green, but it is identified as a local service centre in the Local Plan. That is because Warton, which is a strategic location, is intended to have improved services as a consequence of the development strategy. The first recommendation of the background paper refers to the need for further investment in Warton during the plan period to ensure that the settlement becomes a local service centre through the provision of a local retail centre and community facilities. The circumstances at both Freckleton and Warton differ from Wrea Green, and do not suggest that the latter settlement should receive a higher level of development than would be appropriate at the third level of the settlement hierarchy.

31. I find that, with a limited range of facilities and services, Wrea Green functions as a tier 1 rural settlement. Whilst the number of dwellings referred to in the ELP does not indicate a capacity limit for new development, and has already been exceeded in Wrea Green, the continued addition of significant housing proposals would be contrary to the Local Plan development strategy which seeks to focus development in higher order settlements and strategic locations. Such an approach, as part of the Development Plan, carries considerable weight. There are certain facilities and services, which may generally continue to operate effectively, although the position concerning the school is less clear-cut (above, para 23). They are however limited in extent, as are employment opportunities. In consequence, the proposed housing is likely to generate trips to destinations beyond Wrea Green, and bearing in mind the projections in the transport statement, it is likely that a significant proportion of these would be made by non-sustainable modes of transport. I conclude that the appeal site would not be a sustainable location for the housing development proposed, which would conflict with Policies DLF1, S1, GD1 & GD4 of the Local Plan.

Character and appearance

32. Wrea Green has grown around The Green in the centre of the settlement. The Green is the focal point not only of the settlement, but also of Wrea Green Conservation Area, which comprises this area of open space and the surrounding built development. The appeal site is situated a short distance to the south-west of The Green and is adjacent to the conservation area. It is agricultural land which rises to the south-east from Moss Side Lane.

33. In the *Landscape Character Assessment* (LCA) of *A Landscape Strategy for Lancashire* (CD16.4), Wrea Green and the surrounding countryside are included within The Fylde character area of the coastal plain. The LCA explains that the coastal plain is characterised by gently undulating or flat lowland farmland

[18] CD6.11, table 5.1.

divided by low clipped hedges. Woodland cover is generally low, but views are punctuated by small woods, and settlement is relatively dense. The site comprises part of a larger arable field together with the northern part of a narrow paddock adjacent to the road. Boundaries are the most part marked by hedgerows, and there are lines of trees along Moss Side Lane, and to the south of the site. The trees on the site frontage are covered by a tree preservation order (TPO – CD19.4).

34. Although the statement of common ground for appeal A (CD11.4) includes as an agreed matter that the site is not a valued landscape as detailed by paragraph 109 of the previous version of the NPPF, the Borough Council's landscape witness took a different view, referring to its scenic quality, its contribution to the visual approach to the village, and its inclusion in the view from the conservation area at The Green[19]. The revised NPPF (at para 170a) continues to seek the protection of valued landscapes, but it adds that this should be commensurate with their statutory status or identified quality in the development plan. Site A has no statutory designation, and it is not identified in the Development Plan for its landscape quality. Consequently, in the terms now expressed in the NPPF, it is not a valued landscape.

35. The proposal is in outline form, but an illustrative masterplan has been submitted. In response to the comments of the Inspector who dismissed a previous appeal in 2014 (CD12.4), the housing has been set back from Moss Side Lane, and the western part of the site is intended to form an area of open space. In addition, the junction of the access road with Moss Side Lane is shown further to the west and further from The Green. Notwithstanding the reduced extent of the built form, the development of housing and formation of open space would fundamentally alter the character of the site in a harmful way through urban encroachment. I am particularly concerned about the effect of the proposal on the character of the immediate surroundings. The site brings the rural landscape which surrounds Wrea Green close to the centre of the settlement, and this attribute would be significantly diminished by the appeal proposal. Over time planting would establish a softer edge to the new buildings, but as the housing would be built on the more elevated part of the site, the development would remain as a prominent projection from the existing built form.

36. The second report of *A Landscape Strategy for Lancashire*, the *Landscape Strategy* itself (CD16.5), considers the implications of local forces for change. Amongst other factors, it refers to continued suburbanisation and large scale residential development which would create harsh edges to villages and introduce urbanising elements into the rural landscape of the Fylde. Although the proposal would involve a relatively large development for a rural settlement, the site is close to the centre of Wrea Green and the proposed housing would extend no further south than the nearby built form on either side of Bryning Lane. There would be only limited harm to the wider landscape character area.

37. I turn now to consider the visual effects of the development. On the approach to the site along Moss Side Lane from the south-west, the housing development would come into view past the junction with the track which carries public footpath 5 (Appellant's viewpoint 5 (VP5), Council's VP6.3). Due

[19] CD20.4, para 4.22.

to the rising land, the presence of the buildings would be apparent above the intervening hedgerows, and I do not consider that the additional tree planting proposed would satisfactorily mitigate the extent of built development proposed across this tract of open land. The impact would be greatest along the eastern part of the frontage where the development would be closer to the road, and the positon of the site access would facilitate views (Appellant's VP 8, Council VPs 12.2-12.4). From here the upper parts of dwellings on Bryning Lane and Bryning Avenue are visible on the skyline. The buildings on the appeal site would have a much stronger presence, and there would be a major adverse effect from this part of Moss Side Lane.

38. The appeal site abuts Wrea Green Conservation Area (above, para 14) and clearly forms part of its setting. A report on the conservation area was produced by the Council in 1977 (CD16.6): it explains that the character stems in the main from the grouping of buildings and trees around the central village green, and not from the quality of buildings but from the open space enclosed. The report continues by referring to trees and greenery distributed amongst the buildings, which add to the unity of the setting and help to create attractive vistas and views. I note that the report also states that development behind the frontage buildings (to The Green) does not detract from the conservation area as it is not visible from within its boundary, but that would not be the case in respect of the appeal proposal. Through the gap formed by Moss Side Lane, the greenery of the appeal site is evident from The Green (Appellant's VP7 & 7A, Council's VPs 10.1-10.3), providing not only an attractive foil to the enclosing built form, but also a visible link to the rural landscape. Even with the layout shown on the masterplan, buildings on the appeal site would be seen encroaching into this view, particularly from the south-west corner of The Green. As additional tree cover matured there would greater screening of the housing, but this cover would also have the effect of severely restricting the view out of the conservation area along Moss Side Lane. This effect is illustrated in the Appellant's photomontage from VP7A. I consider that views including the appeal site make an important contribution to the significance of Wrea Green Conservation Area, and that the development would detract from the setting of this heritage asset. In consequence it would conflict with Policies ENV5 & GD7(e) of the Local Plan.

39. I conclude that the proposed development would adversely affect the character and appearance of the area, contrary to Policies GD7(g & h) & ENV1 of the Local Plan. It would not represent an appropriate change in this location, and would be in conflict with paragraph 127(c) of the NPPF which encourages developments to be sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. In particular the harmful effect on the landscape of the site and its surroundings merits significant weight, as does the erosion of visual amenity in views from the northern part of Moss Side Lane and from The Green. For the latter reason, the proposal would detract from the setting of the conservation area: having regard to paragraph 196 of the NPPF, this would represent less than substantial harm to the significance of the conservation area as a whole.

Traffic movement and highway safety

Bryning Lane/ Church Road and the junction with the A584

40. Wrea Green lies at the intersection of four routes. The road to the south (Bryning Lane/ Church Road) provides a route between the M55 and locations in Blackpool and Wyre to the north and Warton to the south where there is a large BAE Systems factory. Notwithstanding the position of agreement reached in the statements of common ground concerning highway matters, there is continuing concern within the local community about the effect of the four appeal proposals on Bryning Lane/ Church Road and on the crossroads junction which it forms there with Lytham Road (the A584) and Highgate Lane (above, para 7).

41. An improvement scheme has been prepared for the crossroads junction, which is linked to three major housing developments permitted in Warton[20]. The measures include carriageway widening, the upgrading of traffic signal equipment and improvements in provision for pedestrians and cyclists[21]. The modelled forecast in the statement of common ground is that the four proposed housing developments in Wrea Green would together generate an additional 24 vehicle movements on Church Road and through the crossroads junction in the morning peak period and an additional 26 vehicle movements in the afternoon peak period[22]: there is no other modelled forecast of traffic movement through the junction before me. The additional traffic would increase the pressure on this busy junction, and it is agreed by the main parties that mitigation measures to address the additional impact would be required if any of the appeal proposals were permitted.

42. The unilateral undertakings in respect of each of the appeals includes provision for payment of a Warton Crossroads Contribution of £314 per dwelling to fund measures referred to in the statement of common ground. Measures envisaged include the installation of microprocessor optimal vehicle activation control, CCTV monitoring, the relocation of loops in the highway, a new signal control box, and new signal poles and heads. The Borough Council's highway witness explained at the inquiry that the extent of the measures required would be contingent on the number of schemes to come forward, and the funding arrangement provides the requisite flexibility for this approach.

43. Bryning Lane between Warton and Wrea Green is relatively narrow, with no footways or lighting, and the route encompasses a number of dips and bends. Traffic moves freely along this road, and although CAPOW referred to an increasing number of accidents, there is no specific evidence of a poor accident record on Bryning Lane. Subject to the implementation of mitigation measures commensurate with the number of dwellings to come forward in Wrea Green I do not consider that the appeal proposal alone, or in combination with any of the other three schemes would reduce highway safety or adversely impact on traffic movement on Bryning Lane/ Church Road and at Warton crossroads.

[20] The location of the housing schemes at Blackfield End Farm, Clifton House Farm and Warton East are shown on the plan at Appendix 1 of CD11.3; a plan of the improvement scheme is at Appendix 10.
[21] The components of the improvement scheme are summarised in Document G3.
[22] The additional traffic movements are given in the table in paragraph 2.15 of CD11.3.

Moss Side Lane

44. Concern has been raised by neighbours that the position of the site access would reduce highway safety. It is common ground between the Appellant and the Borough Council that the new junction would have adequate visibility splays in each direction along Moss Side Lane. The new junction would be on the outside of a sweeping bend. Vehicles turning right may have to wait to enter the access road; however the curvature in the alignment of the road is not so great as to seriously restrict forward visibility for following traffic. Moreover a package of traffic calming measures is supported by each of the proposals[23]. In the case of appeal A these include speed cushion/s and junction table/s on this stretch of Moss Side Lane, which should ensure that the speed of traffic reduces as it approaches the junction with the access road. Dropped kerbs close to The Green would mark a crossing point. Whilst intervisibility between pedestrians and drivers would not be as great on the west side of the road due to the sweeping bend, the traffic calming measures should ensure that sufficient reaction time would be available. It follows that I find that the contribution of £62,893 towards the cost of these works is a necessary component of the unilateral undertaking.

45. The footway on this side of Moss Side Lane ends part way along the frontage of the adjacent property to the north, Five Oaks. As part of the proposed development a 1.8m wide footway would be provided from the access road along the site frontage towards The Green, and it is intended that a narrower 0.8m wide section would continue beyond the Appellant's land to provide a connection to the existing footway[24]. The occupier of Five Oaks disputed that this section of footway can be achieved, arguing that there would be insufficient land between his hedge and the carriageway, and that the situation is complicated by the higher level of the hedge[25]. At the inquiry, the Borough Council's highway witness (who was from the Highway Authority) acknowledged that the hedge itself is not part of the highway. However, having regard to adoption records, he confirmed that, with the hedge cut back, a footway could be formed along the verge in this location.

46. I conclude that the proposed development would not adversely affect traffic movement and highway safety on Moss Side Lane or on the wider highway network. In this respect there would be no conflict with Policy GD7(q) of the Local Plan or paragraph 109 of the NPPF.

Housing land supply

47. There is disagreement between the four Appellants and the Borough Council as to whether there is a five years supply of housing land in Fylde. It is the Borough Council's position that following the adoption of the Local Plan there is a deliverable supply as required by paragraph 73 of the NPPF. For their part, the Appellants point out that the Local Plan was prepared under the former version of the NPPF, and that a new housing land assessment should be undertaken in the context of the revised NPPF.

48. Paragraph 74 of the NPPF makes it clear that a five years supply of deliverable housing sites can be demonstrated where it has been established in a recently

[23] Plans of the traffic calming measures are at Appendix I of CD11.4 and Appendix 4 of CD11.12.
[24] The extended footway is shown on the revised access plan, Document APPA5.
[25] Documents TP22 & TP24.

adopted plan. There can be no doubt that the Fylde Local Plan to 2032, adopted in October 2018, is a recently adopted plan. The Appellants also draw attention to paragraph 3-049 of PPG, which provides guidance on demonstrating a five years land supply. Referring to the NPPF, this part of PPG explains that if strategic policy-makers choose to confirm their five years supply under paragraph 74, they will need to indicate that they are seeking to do so at Regulation 19 stage. The Appellants point out that this step for the purposes of paragraph 74 was not undertaken as paragraph 74 post-dates the examination and previous stages of the then emerging Local Plan (ELP). That chronology is self-evident. However, the version of Policy H1 in the publication edition of the ELP states at part (c): *Ensuring that there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply from the start of each annual monitoring period…* It was clearly the intention at that stage of the ELP that a five years supply of housing land would be established through the Local Plan. That intention remains in the adopted Plan.

49. It is true that the Local Plan was prepared in the context of the previous version of the NPPF. That version explained that sites with planning permission should be considered deliverable unless there was clear evidence that schemes would not be implemented within five years, and the former version of chapter 3 of PPG referred to allocated sites in the same vein. The revised NPPF takes a different approach: the definition of deliverable states that *Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.* I note that the Borough Council issued an updated housing land supply statement in August 2018[26], which removed 736 dwellings from the supply in response to this change in the NPPF. The Appellants' housing land witness has adjusted this figure to reflect the base date of 30 September 2017 agreed for these appeals. He has also reviewed sites which were contested in the evidence to the inquiry, and has suggested that further discounts should be applied in recognition of the position taken by the Borough Council in another appeal in September 2018[27].

50. The revised housing land assessment undertaken on behalf of the Appellants applies scenarios where the shortfall would be met over the remainder of the Plan period (the Liverpool approach) and alternatively where it would be met within the five years period (the Sedgefield approach). The Local Plan Inspector concluded that the Liverpool approach is appropriate in Fylde, and this is specifically referred to in part (c) of Policy H1. On this basis, and applying a 20% buffer, a five years requirement of 2,858 dwellings is calculated, as set out in the penultimate column of table 2 of the housing supply statement of common ground (CD11.2). Application of the Appellants' discounts to the supply given in the September 2017 housing land supply statement (CD15.1) would give a reduced level of 2,477 dwellings, sufficient for 4.33 years[28].

51. As the Appellants' evidence demonstrates, a variety of housing land scenarios can be calculated. However in this case there is a very recently adopted Local Plan, in relation to which the Inspector has found that there is a housing land

[26] Document LPA11, Appendix A. Although published in August 2018, this document has a base date of 31 March 2018.
[27] Document APPJ13, paras 11.32-11.40.
[28] Document APPJ13, table in para 11.41.

supply of 6.4 years[29], and the NPPF reaffirms that the development plan is the starting point for decision making. It is the intention that the Local Plan (Policy H1(c)) will provide enough deliverable land to maintain a five years supply, and I agree with the Appellants that it is too early for an annual position statement to be prepared. For these reasons I conclude that the Borough Council is entitled to rely on paragraph 74 of the NPPF to demonstrate a five years supply of housing land through its recently adopted Local Plan. Both Policies DLF1 and H1 refer to a minimum level of provision for housing. There is no ceiling on the number of new dwellings which may come forward, and, bearing in mind paragraph 59 of the NPPF which refers to the Government's objective to significantly boost the supply of homes, the additional dwellings proposed in appeal A would represent a benefit, although one to which I attribute moderate weight only given its modest size in the context of the overall housing requirement.

Other considerations

Affordable housing

52. Addendum1 to the Fylde Coast Strategic Housing Market Assessment identifies a net annual affordable housing need of 249 dwellings in the Borough, representing a significant proportion of the overall annual need for 415 dwellings. In response, Policy H4 of the Local Plan seeks the provision of 30% affordable housing on schemes of 10 or more dwellings. An obligation in the unilateral undertaking would secure this level of provision. Whilst this is an important benefit of the proposal, it would result in 15 affordable dwellings. In view of the limited contribution to the need for affordable homes, this is a benefit to which I give moderate weight.

Biodiversity

53. It is intended that the scheme would include measures to enhance biodiversity in accordance with Policy GD7 of the Local Plan, and these could be secured by conditions. Much of the green infrastructure on the site would be included in areas of informal open space, where activity generated by the new housing would be likely to cause a certain amount of disturbance to the natural environment. Accordingly I give moderate weight to biodiversity enhancements.

Drainage and flood risk

54. Concern has been expressed by CAPOW about incidents of flooding in Wrea Green, and Moss Side Lane is cited as the road with the worst flooding problems in the village. Photographs of flooding in 2016 have been submitted, one of which shows water across the road close to the existing access to the appeal site[30]. The flood risk assessment (CD6.5) acknowledges the problem on Moss Side Lane, but records Lancashire CC, as lead local flood authority, explaining that there is no requirement for a developer to find a solution to existing issues beyond what is possible within the layout and form of the development itself. The proposal would result in an increase in impermeable surfaces, raised above Moss Side Lane. Accordingly the sustainable drainage statement proposes attenuation and storage of surface water to avoid the greenfield run-off rate being exceeded. With the safeguard of a condition

[29] Document LPA13 Appendix D, para 87.
[30] Photographs of flooding on Moss Side Lane are on pages 20-22, 27 & 28 of Document TP3b.

requiring approval of a surface water scheme incorporating any necessary flow attenuation measures, I do not consider that the proposed development would increase flood risk in the locality.

Living conditions

55. Orchard Cottage is situated on the opposite side of Moss Side Lane, close to the position of the proposed access. The occupiers are concerned that headlights from vehicles leaving the site would cause a nuisance. The access plan (Document APPA5) shows the junction with the new road just off-set from Orchard Cottage. Vehicles turning left would face towards its front elevation, but the effect of their lights could be minimised by the level of the access road, and that is a matter which could be the subject of a condition.

56. Concern has also been expressed about noise from commercial vehicles passing over speed cushions and junction tables on Moss Side Lane. The presence of several of these traffic calming features on this short stretch of road should ensure that vehicles travel more slowly and that the speed limit of 20mph is generally observed. At this speed I do not consider that noise from vehicles travelling along Moss Side Lane would be likely to unacceptably worsen the living conditions of nearby residents. Accordingly I find no conflict with criterion (h) of Policy GD7 which requires development proposals to be sympathetic to surrounding land uses and occupiers.

Economic considerations

57. The Appellant refers in general terms to economic benefits from jobs and spending, both during the construction period and when properties would be occupied. There is no detailed evidence on this matter, and in any event these are generic considerations which would apply equally to any development of 50 dwellings in the area. Economic considerations merit little weight in support of the appeal proposal.

Tree preservation order

58. A group of eight trees on the frontage of the appeal site (five sycamores, two beech and one ash) are covered by a tree preservation order (CD19.4). None of the trees would need to be removed to accommodate the proposed development.

Agricultural land

59. It is the Appellant's undisputed evidence that the majority of the appeal site is grade 3b land[31], which is not the best and most versatile land. Moreover the site does not involve a significant loss of agricultural land in this part of the Borough.

Public realm enhancements

60. In line with Policy INF2 of the Local Plan, the Council's Regeneration Framework (CDs19.10 & 19.11) identifies projects across the Borough for environmental improvements. The Wrea Green Project (CD19.7) includes enhanced street lighting, enhancing the area outside St Nicholas's Church, footway improvements and tree planting around The Green. The Council explains that the works for which funding has already been secured would not

[31] CD6.3, para 4.32.

secure the improvements to the public realm necessary to mitigate the effect of the proposals. It has been agreed that a contribution of £1,000 per dwelling would be made to the project, including extending the improved paving scheme in the conservation area and developing the grassed area in front of the public house for community activity. The unilateral undertaking includes an obligation to this effect. As these enhancements also represent mitigation, I give them only limited weight.

The planning obligations

61. I have already considered the provisions of the planning obligations concerning contributions towards the Warton crossroads and Wrea Green highway schemes (above, paras 42 & 44), affordable housing (para 52) and public realm enhancements (para 60). These measures are consistent with local policies and their implementation would be necessary to contribute to a satisfactory standard of development. I find that the statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations are met, and the provisions of the unilateral undertaking are material considerations in this appeal.

Conclusions

62. The proposal would cause less than substantial harm to the significance of Wrea Green Conservation Area, and in accordance with paragraph 196 of the NPPF, this harm, which carries great weight, must be weighed against the public benefits of the development. The provision of additional market housing carries moderate weight. I also attach moderate weight to the affordable housing which would be brought forward by the scheme and to biodiversity enhancements. In addition the contribution of the scheme towards public realm enhancements in Wrea Green and economic benefits provide limited and little weight in support of the proposal. I conclude that the combination of public benefits does not outweigh the less than substantial harm to the significance of the conservation area.

63. Wrea Green would not be a sustainable location for the residential development proposed, which would conflict with Policies DLF1, S1, GD1 & GD4 in the Local Plan, and this is a matter to which I give significant weight. Because of its adverse effect on the setting of the conservation area and other harm to the character and appearance of the area, there would also be conflict with Policies ENV1, ENV5 & GD7. The harmful effect on the landscape of the site and its surroundings merits significant weight, as does the erosion of visual amenity in views from the northern part of Moss Side Lane and from The Green. Although there would be compliance with other aspects of Policy GD7 concerning highway safety, the relationship with nearby uses and biodiversity, and the level of affordable housing sought by Policy H4 would be provided, I conclude that the proposal would be contrary to the Development Plan considered as a whole. I have identified the benefits of the proposal above (para 62). These would be clearly outweighed by the harm caused by the proposal, and there are no material considerations which indicate that the appeal should be determined other than in accordance with the Development Plan.

64. For the reasons given above, and having regard to all matters raised including the suggested conditions, I conclude that the appeal should be dismissed.

Richard Clegg

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr J Easton of Counsel	Instructed by the Legal Services Department, Fylde BC.
He called	
Mr S Smith BA MSc	Blackpool Airport Enterprise Zone Delivery Manager, Blackpool Council.
Mr A Stell BA(Hons) MRTPI	Development Manager, Fylde BC.
Mr N J Stevens BEng(Hons) MSc	Highways Development Support Manager, Lancashire County Council.
Mr D Longdin BSc DipLA FLI	Partner, Randall Thorp.

FOR APPELLANT A:

Mr A Crean QC	Instructed by Colliers International.
He called	
Mr P Gray BA(Hons) BLA CMLI	Director, PGLA Landscape Architects.
Mr K G Riley BSc(Hons)	Projects Director, Mott MacDonald.
Mr A H Aitken BSc MRTPI	Head of UK Planning, Colliers International.

FOR APPELLANT B:

Mr V Fraser QC	Instructed by Mr Harris.
He called	
Mr S A Harris BSc(Hons) MRTPI	Director, Emery Planning Partnership.
Mr N I Folland BA(Hons) DipLA CMLI	Director, Barnes Walker Ltd.
Mr D Roberts IEng FIHE FCIHT	Director, SCP.

FOR APPELLANT C:

Mr M Carter of Counsel	Instructed by Mr McAteer.
He called	
Mr A McAteer DipTP DMS MRTPI	Director, McAteer Associates Ltd.
Mrs L Cruice BA DipLA TechArborA CMLI	Director, Appletons.
Mr J B Farmery MEng CEng MICE MCIHT ICE	Managing Director, Cole Easdon Consultants Ltd.
Mr R Bowley BSc CEng MCIWEM	Director, Cole Easdon Consultants Ltd.

FOR APPELLANT D:

Mr I Ponter of Counsel	Instructed by Knights 1759.

He called	
Mr W Booker BSc	Director, SCP.
Mr J Berry BA(Hons) DipLA CMLI AIEMA MArborA	Partner, Tyler Grange LLP.
Mr A Corinaldi-Knott MTCP MRTPI	Associate, Knights 1759.

INTERESTED PERSONS:

Councillor F Andrews	Member of Fylde BC for Ribby-with-Wrea Ward.
Councillor J Maskell	Chairman, Ribby with Wrea PC.
Councillor M Wright	Member of Bryning-with-Warton PC.
Mr J Rowson	Chairman, Community Association for the Protection of Wrea Green.
Mr P Bagot	Local resident.
Mr E Brown	Local resident.
Mr M Cockrill	Local resident.
Mr R S Hetherington	Local resident.
Mr G McAuley	Local resident.
Mrs J Moreau	Local resident.
Mr J E Murphy	Local resident.
Mrs M A Murphy	For Mrs R Hatton, local resident.
Mr J Nelson	Local resident.
Mrs H Rowley	Local resident.
Mr J D Rowley	Local resident.
Mr J Smallwood	Local resident.
Mr B Taylor	Local resident.

CORE DOCUMENTS – SUPPLEMENTARY LIST

CD20	**The LPA's additional proofs of evidence**
CD20.10	Mr Smith's rebuttal proof of evidence.
CD20.11	Appendices to Document CD20.10.
CD20.12	Mr Longdin's rebuttal proof of evidence.
CD20.13	Appendices to Document CD20.12.
CD21	**The Appellants' joint proofs of evidence**
CD21.1	Mr McAteer's proof of evidence on behalf of the Appellants.
CD21.2	Appendices to Document CD21.1.
CD21.3	Mr Harris's proof of evidence on behalf of the Appellants.
CD21.4	Appendices to Document CD21.3.
CD22	**Appellant A's proofs of evidence.**
CD22.1	Mr Gray's proof of evidence.
CD22.2	Appendix to Document CD22.1.
CD22.3	Mr Riley's proof of evidence.
CD22.4	Appendices to Document CD22.3.
CD22.5	Mr Aitken's proof of evidence.
CD22.6	Mr Aitken's supplementary proof of evidence.
CD22.7	Appendix to Document CD22.6.
CD23	**Appellant B's proofs of evidence**
CD23.1	Mr Folland's proof of evidence.
CD23.2	Appendices to Document CD23.1.
CD23.3	Mr Roberts's proof of evidence.

CD23.4 Appendices to Document CD23.3.
CD23.5 Mr Harris's proof of evidence on behalf of Appellant B.
CD23.6 Appendices to Document CD23.5.

CD24 Appellant C's proofs of evidence

CD24.1 Mrs Cruice's proof of evidence.
CD24.2 Appendices to Document CD24.1.
CD24.3 Mr Farmery's proof of evidence.
CD24.4 Mr Bowley's proof of evidence.
CD24.5 Appendices to Document CD24.4.
CD24.6 Mr McAteer's proof of evidence on behalf of Appellant C.
CD24.7 Appendix to Document CD24.6.

CD25 Appellant D's proofs of evidence

CD25.1 Mr Berry's proof of evidence.
CD25.2 Appendices to Document CD25.1.
CD25.3 Mr Booker's proof of evidence.
CD25.4 Appendices to Document CD25.3.
CD25.5 Mr Corinaldi-Knott's proof of evidence.

THE LPA's DOCUMENTS

LPA1 Mr Easton's opening statement.
LPA2 Mr Stevens's note on qualifications and experience.
LPA3 Exchange of emails of March & April 2018 between the Council and Bannister Bates concerning a planning agreement relating to Oaklands Caravan Park.
LPA4 Extended extract from planning obligation concerning land at West Cliffe, Lytham St Annes.
LPA5 Extract from Sustrans website.
LPA6 CIL statement.
LPA7 Plan showing drainage concept overlain on wildlife corridor proposals for site C.
LPA8 Email dated 2 May 2018 from Mr Stell to Mr Easton & Mr Longdin concerning the heights of houses proposed on site C.
LPA9 Mr Easton's closing submissions.
LPA10 Email dated 4 May 2018 from Lancashire CC to Mr Stell concerning a footway link to site C.
LPA11 Letter dated 27 August 2018 from Mr Stell relating to the revised NPPF, and Housing Land Supply Statement 31 March 2018.
LPA12 Letter dated 10 September 2018 from Mr Stell commenting on representations in respect of the revised NPPF.
LPA13 Letter dated 29 October 2018 from Mr Stell relating to the Local Plan and updates to PPG.
LPA14 Appeal decision ref APP/M2325/W/17/3187426 concerning 68 dwellings at Wesham.

THE APPELLANTS' JOINT DOCUMENTS

APPJ1 Timetables for bus services through Wrea Green.
APPJ2 Headteachers's statement on school information from Ribby-with-Wrea Primary School website.
APPJ3 Ribby-with-Wrea Primary School Admission Arrangements, September 2019.
APPJ4 Extract from planning obligation concerning land at West Cliffe, Lytham

St Annes.

APPJ5 The Council's statement of case in respect of an appeal for up to nine dwellings at Elswick.

APPJ6 Errata note for the emerging Local Plan by the Council concerning housing land supply.

APPJ7 Extract from the Council's closing submissions for an appeal concerning land adjacent to Kilnhouse Lane and Queensway, Lytham St Annes.

APPJ8 Notice of granting of non-material amendment concerning planning permission ref 15/0787 at Electronic Data Systems, Heyhouses Lane, Lytham St Annes.

APPJ9 Mr Crean's, Mr Fraser's, Mr Carter's & Mr Ponter's closing submissions concerning joint matters.

APPJ10 Letter dated 13 August 2018 from Mr McAteer relating to the revised NPPF.

APPJ11 Letter dated 24 August 2018 from Mr Harris relating to the revised NPPF.

APPJ12 Letter dated 10 September 2018 from Mr Harris commenting on representations in respect of the revised NPPF, and appeal decision relating to residential development at Bamber Bridge.

APPJ13 Mr Harris's statement in respect of the Local Plan and updates to PPG.

APPJ14 Mr Corinaldi-Knott's statement in respect of the Local Plan.

APPELLANT A's DOCUMENTS

APPA1 Unilateral undertaking in respect of appeal A.

APPA2 Mr Crean's opening statement.

APPA3a-b Appeal decision and report concerning mineral extraction and auger mining scheme at Widdrington, Northumberland.

APPA4 Corrected LVIA summary tables.

APPA5 Revised access plan for site A.

APPA6 Mr Crean's closing submissions

APPA7 Judgement in Derbyshire Dales DC and Peak District NPA v Secretary of State for Communities & Local Government and Carsington Wind Energy Ltd [2009] EWHC 1729 (Admin).

APPELLANT B's DOCUMENTS

APPB1 Mr Fraser's opening statement.

APPB2 Unilateral undertaking in respect of appeal B.

APPB4 Mr Fraser's closing submissions.

APPB5 Mr Harris's response to Document G13.

APPELLANT C's DOCUMENTS

APPC2 Mr Carter's opening statement.

APPC3 Unilateral undertaking in respect of appeal C.

APPC4 Plans showing the adopted highway in the vicinity of site C.

APPC5 Plot levels plan – site C.

APPC6 Extracts from glossary, the Planning Portal.

APPC7 Revised access plan for site C.

APPC8 Mr McAteer's response to Document G13.

APPELLANT D's DOCUMENTS

APPD2	Mr Ponter's opening statement.
APPD3	Email dated 2 May 2018 from Knights 1759 to the Council and the County Council concerning the unilateral undertaking for appeal D.
APPD4a-e	Revised plans for appeal D.
APPD5	Mr Corinaldi-Knott's note concerning the extent and ownership of site D.
APPD6	Mr Ponter's closing submissions.
APPD7	Unilateral undertaking in respect of appeal D.
APPD8	Letter dated 28 August 2018 from Mr Corinaldi-Knott relating to the revised NPPF.

OTHER PARTIES' DOCUMENTS

TP1	Councillor Andrews's statement and appendix.
TP2	Councillor Maskell's statement.
TP3a-b	Mr Rowson's statements and appendices.
TP4a-c	Mr Rowson's comments on the LPA's and Appellants' proofs and the statements of common ground.
TP5	Councillor Wright's statement.
TP6	Mr & Mrs Rowley's statement in respect of Appeal A.
TP7	Mrs Rowley's comments on other parties' proofs and the statements of common ground.
TP8	Mr Hetherington's statement in respect of Appeal A.
TP9	Mr Hetherington's comments in response to Mr Gray's proof of evidence.
TP10	Mr Bagot's statement and appendices in respect of Appeal A.
TP11	Mr Cockrill's statement in respect of Appeal B.
TP12	Photographs relating to Document TP27.
TP13	Mr & Mrs Murphy's statement and appendix in respect of Appeal C.
TP14	Mr & Mrs Murphy's comments on the Appellants' proofs.
TP15	Mr Smallwood's statement in respect of Appeal C.
TP16	Mr & Mrs Hatton's statement and appendix in respect of Appeal C.
TP17	Mr Brown's statement in respect of Appeal C.
TP18	Mr McAuley's statement and appendix in respect of Appeal D.
TP19	Mr Taylor's statement in respect of Appeal D.
TP20	Mr Brown's supplementary statement and appendices.
TP22	Email dated 16 April 2018 from Legal & Democratic Services at Lancashire CC to Mr Bagot concerning a hedgerow on Moss Side Lane.
TP23	Bundle of representations from Mr & Mrs Moreau in respect of Document APP3B.
TP24	Mr Bagot's supplementary statement.
TP25	Mr Nelson's statement in respect of Appeal B.
TP26	Mr Rowley's comments on other parties' proofs and the statements of common ground.
TP27	Mrs Moreau's statement in respect of Appeal B.
TP28	Mr & Mrs Murphy's revised statement.
TP29	Email dated 1 May 2018, with plan, from Mrs Moreau to Mr Stell concerning separation distances in respect of appeal B.
TP30	Appendices to Document TP15.
TP31	CAPOW's comments relating to the revised NPPF.
TP32	Ribby-with-Wrea PC's comments relating to the revised NPPF.
TP33	CAPOW's comments on representations in respect of the revised NPPF.

TP34 Ribby-with-Wrea PC's comments in respect of the Local Plan and the 2016 household projections.
TP35 CAPOW's comments in respect of the Local Plan and the 2016 household projections.

GENERAL DOCUMENTS

G1 Schedule of disputed housing sites prepared by the Appellants and the Council
G2 Supplementary statement of common ground for appeal A in relation to paragraph 109 of the NPPF.
G3 Mr Stevens's note concerning highway scheme at Lytham Road/Church Road, Warton.
G4 Adopted Local Plan proposals map.
G5 Extract from emerging Local Plan policies map.
G6 Site plan for previous appeal proposal on site C.
G7 Council minutes concerning Wrea Green Conservation Area report.
G8 Note on housing delivery and the development strategy.
G9 Plan of the ecclesiastical parish of St Nicholas, Ribby-cum-Wrea.
G10 Site visit locations suggested by parties attending the inquiry.
G12 List of possible conditions submitted by the Council and the Appellants.
G13 Regulation 2(4) notices concerning pre-commencement conditions, appeals B & C.