

## Section 78 of the Town and Country Planning Act 1990

Appeal by Baxters Construction Ltd against decision of Lancashire County Council to refuse to grant planning permission for the extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration of leisure end uses, agricultural land and biodiversity enhancement using imported fill

LPA Ref: LCC/2023/0030

Appeal Ref:6002168

# Summary Proof of Evidence, Highways

Mytax Farm, Bourbles Lane, Poulton-le-Fylde

**MARCH 2026**



## SCP GENERAL NOTES

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**Project No.:** 260086

**Title:** Summary Proof of Evidence, Highways, Mytax Farm, Bourbles Lane, Poulton-le-Fylde

**Date:** 18 March 2026

<b>Date</b>	<b>Status</b>	<b>Prepared by</b>	<b>Issued by</b>
18 <sup>th</sup> March 2026	Issue	Jim Budd	Jim Budd

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# 1 SUMMARY PROOF OF EVIDENCE

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## **Qualifications and Experience of Jim Budd**

- 1.1 I am Director of Singleton Clamp & Partners Ltd, trading as SCP, part of the RSK Group. We are a firm of transportation planners and infrastructure designers, with offices in Edinburgh, Manchester, Leeds, Bristol, London and Chelmsford.
- 1.2 I hold an MSc in Transport Engineering and Planning from Salford University and am also a Fellow of the Chartered Institute of Highways and Transportation. I have over 30 years' experience in providing transport and highways advice on matters relating to a comprehensive range of development types.
- 1.3 I am well acquainted with the appeal site and local area, having visited the site and undertaken further detailed investigations for the purpose of preparing my evidence.
- 1.4 I confirm that I understand that in presenting evidence that my duty is to the inquiry and accordingly the opinions expressed are my true and professional opinions and have been prepared in accordance with the CIHT Code of Conduct, irrespective of by whom I am instructed.

## **Relevant Planning Policy and Guidance**

- 1.5 In my evidence I present what I consider to be the relevant national and local transport policies and guidance.
- 1.6 It covers the specific policies referenced in the Lancashire County Council (LCC) Decision Notice which relate to transport, namely The Joint Lancashire Minerals and Waste Local Plan Policy DM2, The Wyre Local Plan Policy CDMP6 and the National Planning Policy Framework.
- 1.7 I also refer to technical guidance contained within Manual for Streets.

## **Scope of Evidence**

- 1.8 My proof has been prepared to address the highways reason for refusal which relates to highway safety, specifically at the proposed site access on Lancaster Road, along Lancaster Road to the east of the site access and at two other locations on the local highway network. These are the locations that comprise the focus for LCC Highways' safety concerns with respect to the appeal proposal.
- 1.9 In my evidence I present my own assessment of the baseline highway safety situation at these locations, taking account of accident records, traffic survey data and my own observations of the highway network.
- 1.10 I have then considered the proposed site access design and highway mitigation measures that have been proposed as part of the planning application and the suitability of these in the context of the highway safety record, the forecast appeal scheme traffic flows and relevant technical guidance.

### **Proposed Site Access**

- 1.11 With regards to the proposed site access, my assessment of this has considered topographical survey mapping, the adopted highway extent records, recorded vehicle speed data for Lancaster Road and technical standards contained within Manual for Streets. Based on this assessment I consider that the proposed site access arrangement would comply with the required technical standards and provide a safe and suitable access for the appeal scheme, meeting the requirements of the NPPF (paragraphs 115 and 116) and the Wyre Local Plan Policy CDMP6.
- 1.12 The appellant has nonetheless offered to include a new speed speed indicator device on the eastbound approach to the proposed site access as part of the S278 scope, to help enforce the 30mph speed limit here, which would provide a benefit to road users beyond the life of the appeal site.

### **Lancaster Road**

- 1.13 Along Lancaster Road between the proposed site access and the junction with the A588, the concern from LCC Highways is with regard to the width of the route in the context of the forecast increase in Heavy Goods Vehicle (HGV) movements generated by the appeal scheme.
- 1.14 Whilst I accept that there will be a notable percentage increase in HGV usage on Lancaster Road, this belies the fact that such usage will still be low in absolute terms. I also consider that the appellant's offer to manage their HGV movements in and out of the site to prevent scheme related HGVs meeting on Lancaster Road would be a viable and effective mitigation measure to address LCC Highways' concern here. The appellant has the ability to implement such a management system and this can be secured by a planning condition.
- 1.15 In addition, the planning application included proposed mitigation in the form of road widening on Lancaster Road. The ability to deliver such widening is questioned by LCC Highways however I have undertaken my own assessment of the potential for widening to assist the Inspector and I consider that there is considerable scope for the widening of the carriageway on Lancaster Road should the inspector deem it to be essential. The proposed mineral extraction scheme is due to be in operation for a limited number of years, however the physical improvement to the carriageway width, if provided, would provide benefits to other road users beyond this.
- 1.16 New signage on Lancaster Road has also been proposed as mitigation, to provide warning to drivers of the narrow road width. The provision of new signage of this nature is considered to be a suitable measure to help address concerns regarding the width of Lancaster Road and it is understood that LCC Highways are in favour of the signage in principle, which is a conventional/orthodox solution. LCC Highways however have concerns with this proposed mitigation as they consider that there would not be enough space within the adopted highway to place the signs.
- 1.17 I consider that there is sufficient space to provide suitable signage within the highway verge should the inspector deem it essential. Furthermore, the local highway authority has the necessary powers to enter private land to facilitate the placement,

maintenance, or removal of traffic signs and signposts, under Section 71 of the Road Traffic Regulation Act of 1984. The extent of the adopted highway boundary should not therefore be a constraint in relation to this particular proposed mitigation measure.

### **Proposed Signage on the A588**

- 1.18 LCC Highways' concern regarding the two locations on the A588 (Fold House Farm bend and Cemetery Lane junction) relates to road safety as they consider that the width of the road makes it unsuitable to accommodate the increase in HGV traffic that would result from the appeal scheme.
- 1.19 LCC Highways accept that new warning signage would be suitable mitigation at these locations however they have concerns about whether new signs could be placed within the adopted highway. The powers available to LCC Highways under both the Highways Act 1980 and the Road Traffic Regulation Act 1994 would allow them to place highway signage within third party land if necessary, therefore I do not consider this to be a valid reason for a highways objection to this mitigation measure.

### **Highway Mitigation Strategy**

- 1.20 I consider that my evidence demonstrates that the highway mitigation measures that have been proposed in support of the appeal scheme are capable of being conditioned and implemented via a s278 agreement with LCC.
- 1.21 This mitigation strategy, which includes an agreed junction improvement at the Lancaster Road / A588 junction, is appropriate to address the safety concerns raised by LCC Highways. In this instance however, additional value would be provided to road users beyond the lifetime of the appeal scheme as the proposed physical works and new warning signage on the highway network would be in place after the quarrying activity was completed and the site restored.
- 1.22 Rule 6 party representations have been made as part of this appeal. I have reviewed these submissions as they relate to highway safety matters. My evidence explains why these do not change my view that the proposed highway mitigation measures would adequately address the highway safety concerns that have been raised both by LCC Highways and by the Rule 6 parties during the course of the planning application.

### **Conclusion**

- 1.23 In my evidence I demonstrate that each of the highway safety concerns raised by the Local Highway Authority can be adequately addressed through the mitigation measures proposed at the planning application stage.
- 1.24 Having regard to the above, I consider the proposals to be entirely policy compliant both at a local and national level. My evidence confirms that there are no transport or highways-related reasons why the appeal should not be allowed.