



**THE PLANNING ACT 2002
SECTION 89
AND THE INFRASTRUCTURE PLANNING
(EXAMINATION PROCEDURE) RULES 2010
APPLICATION BY HIGHWAYS ENGLAND
FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE
A585 WINDY HARBOUR TO SKIPPOOL IMPROVEMENT SCHEME**

_____ o o o _____

WRITTEN REPRESENTATIONS

On behalf of

MR GARTH & MRS HELEN MORETON

Reference: WSK-AFP064 & WSK-AFP065

Objector's Reference: C3781-1/ATC

1. **ORDER** Development Consent Order for the A585 Windy Harbour to Skippool Improvement Scheme.

2. **OBJECTOR** Mr Garth and Mrs Helen Moreton

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]

3. **OBJECTOR'S LEGAL STATUS**

3.1 The Objectors are entitled to the freehold interest in respect of their property, The

[REDACTED]

4. **CURRICULUM VITAE**

4.1 My name is Andrew Thomas Coney. I am a Chartered Surveyor, Fellow of the Central Association of Agricultural Valuers and a Registered European Valuer and a Partner in the firm of P Wilson and Company LLP of Burlington House, Ribblesdale Place, Preston, PR1 3NA.

4.2 I graduated from the Royal Agricultural College with a Diploma of Estate Management in 1985. I qualified as a Chartered Surveyor in 1989 and became a Fellow of the Central Association of Agriculture in 1991. I have been a member of the RICS Valuer Registration Scheme since its inception in 2011 and a Registered European Valuer since 2015. I am also a Member of the Agricultural Mortgage Corporation Valuation Panel.

4.3 After graduating from the Royal Agricultural College I worked in Lancashire in Private Practice where my work was largely management and utility based. I then moved to Drewett Neate a multi-disciplinary firm where I undertook a broad range of professional work. I led the firm's work on the Newbury ByPass Scheme in the early 1990's where the practice acted for most affected landowners. In 1994 I returned to Lancashire and joined Smith Hodgkinson McGinty as a Partner where I was responsible for running the Preston Office of that firm and undertook a wide range of instructions including acting for landowners affected by the M65 Motorway Proposals.

In 1999 I joined P Wilson and Company where I undertake a broad range of instructions including many compulsory purchase schemes which recently have included the Broughton ByPass, Preston Western Distributor Road and East West Link Road and extensive instructions with regard to HS2.

4.4 I have therefore worked in Private Practice as a Chartered Surveyor for 32 years and for the last 24 years have been based in Preston and practice throughout the North West of England.

4.5 Away from P Wilson and Company I have held various national leadership roles within the Central Association of Agricultural Valuers and am currently Chairman of the National Valuation Compensation and Taxation Committee.

4.6 I have appeared in cases before the Courts, Tribunals and Arbitrations as well as at Planning and Compulsory Purchase Inquiries either as an Expert Witness, Advocate or a Witness of Fact.

5. INSTRUCTIONS

5.1 I am instructed by the Objectors to present and explain their case in respect of the proposed DCO.

5.2 The Statements of Objection in respect of the proposed DCO were proposed and submitted by me and any negotiations that have or are taking place with the acquiring Authority in connection with those objections have been undertaken by me.

5.3 As a Chartered Surveyor I am required to comply with the various Practice Statements and Guidance Notes published by the RICS. In this Instruction I am presenting the Objections Case as an advocate and witness of fact rather than an expert witness. However to assist the Inspector and the Inquiry I will be happy to answer any queries on the content of this statement.

6. WRITTEN REPRESENTATION AND OBJECTIONS TO THE PROPOSED DEVELOPMENT CONSENT ORDER

- 6.1 My client's property, The [REDACTED], lies at the [REDACTED] of the proposed scheme. I attach at Appendix 1 to this written representation a plan showing the extent of my client's property that briefly comprises a substantial 4 bedroom detached house set in large grounds and with substantial outbuildings.
- 6.2 The proposed DCO, if confirmed, would acquire a substantial part of the frontage of my client's property. I attach at Appendix 2 a relevant extract of the DCO plans showing the extent of the proposed land take.
- 6.3 In my client's view (a view I share) the extent of the land take proposed is excessive; no mitigation measures have been proposed; the access and egress from my client's property is effectively impossible post construction of the proposed highway improvement and therefore their continued use and enjoyment of the property is not possible.
- 6.4 What my clients request is that the DCO and the design of the scheme are so amended so as not to require the purchase of any of my client's property and to redesigned in such a way that an effective access to my client's property through their existing gateway is facilitated from the new highway.

Dated: 15 May 2019

[REDACTED]

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Andrew T Coney MRICS FAAV REV
P Wilson & Company LLP
Chartered Surveyors
Duly authorised Agent for and
on behalf of
Mr Garth and Mrs Helen Moreton

APPENDIX 1



TITLE NUMBER

LA911377

N



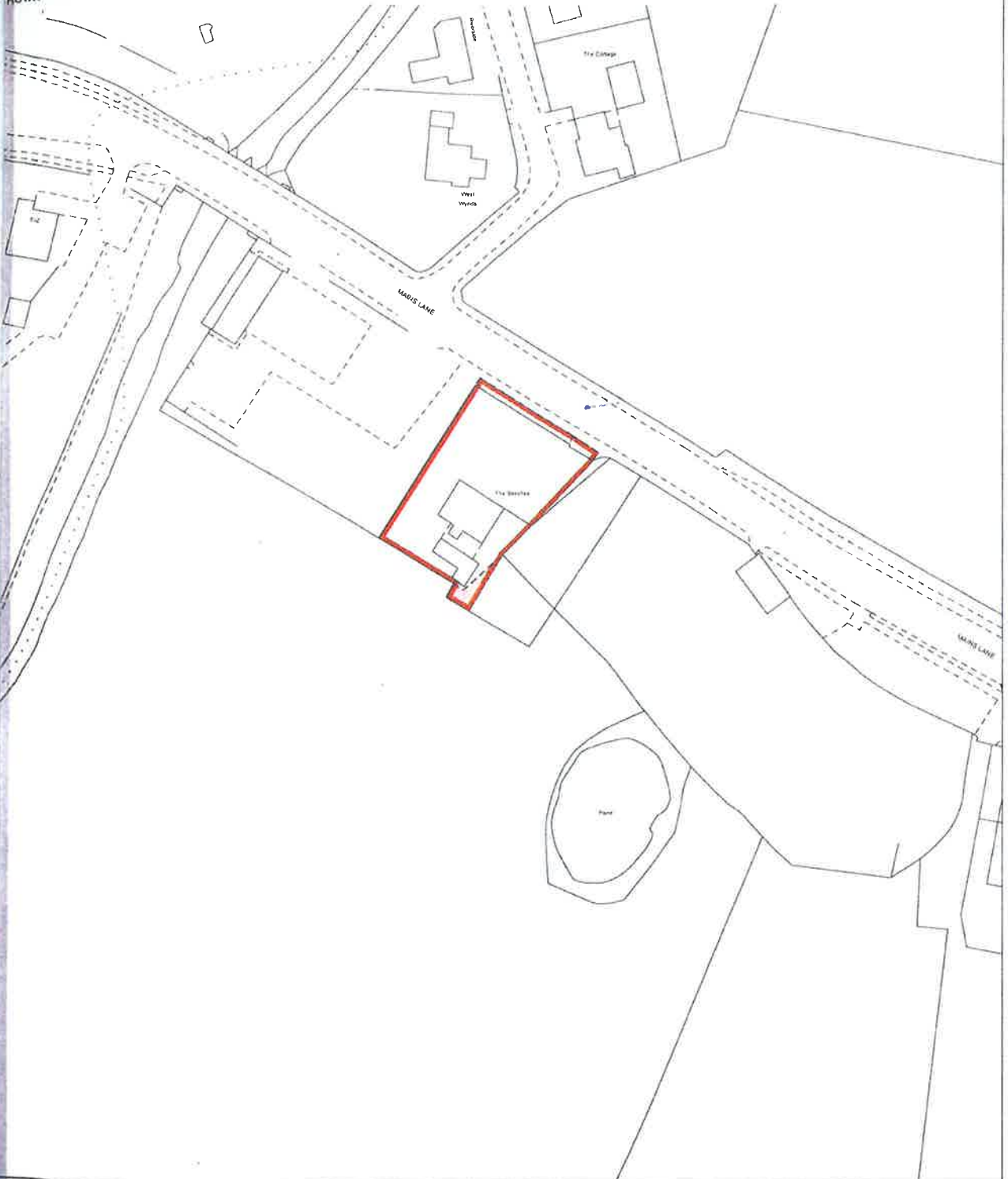
LANCASHIRE : FYLDE

ORDNANCE SURVEY MAP REFERENCE:

SD3540SE

SCALE 1:1250

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HM Land Registry
Official copy of
title plan

Title number **LA513894**

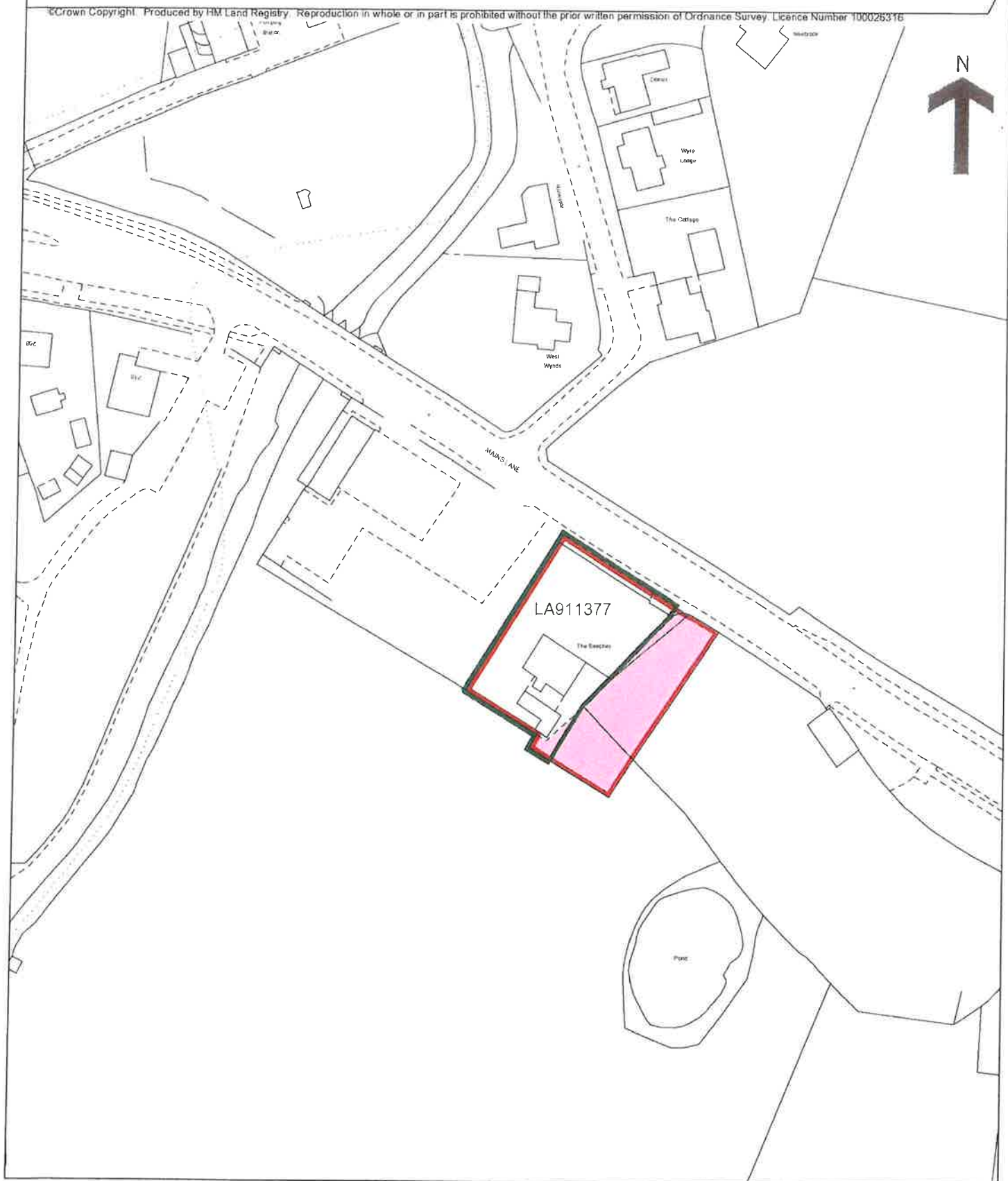
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Scale **1:1250**

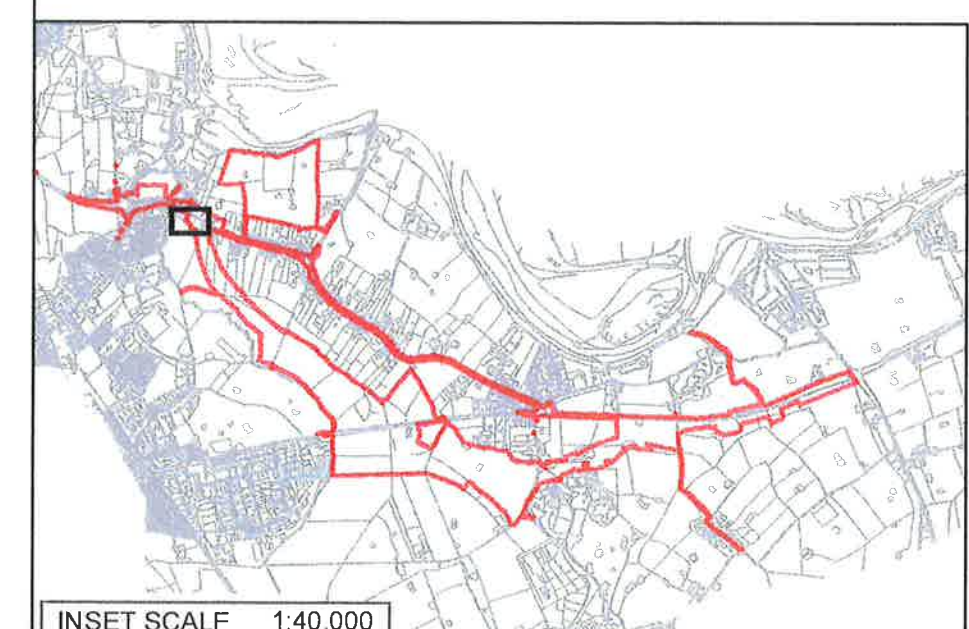
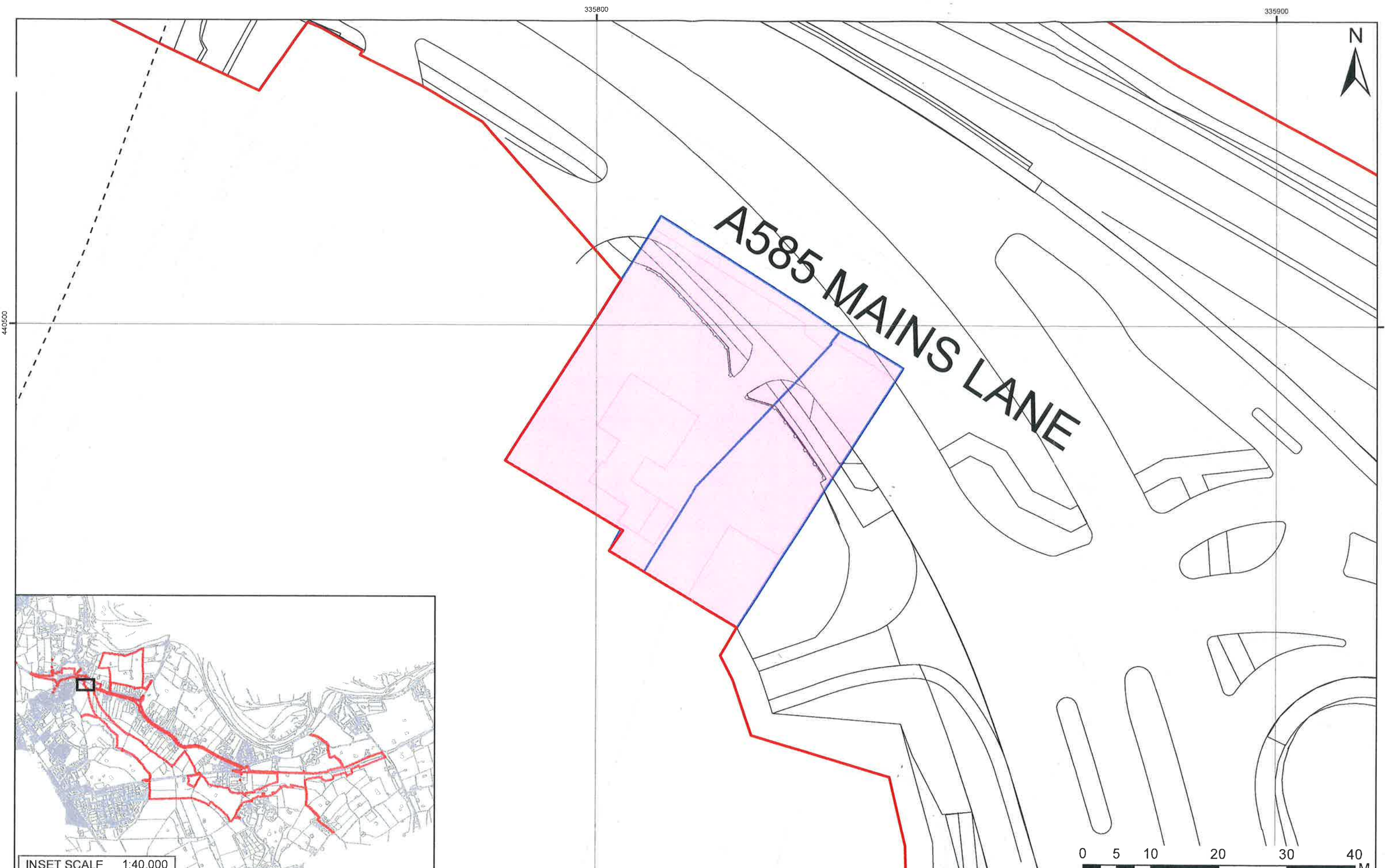
Administrative area **Lancashire : Fylde**



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APPENDIX 2



02	S3	13/09/18	Area Totals Included	TR	HB	NH
01	S3	17/07/18	Post Consultation Update	TR	PT	NH
00	S3	15/02/18	For Information	TR	PT	NH
Rev	Status	Rev. Date	Purpose of revision	Drawn	Check	Appr

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Legend

- Development Consent Order Boundary / Limits of Land to be Acquired or Used Permanently or Temporarily
- Land to be Acquired = 1840m2
- Land to be Used Temporarily and Rights to be Acquired Permanently
- Land to be Used Temporarily
- Public Footpath
- Outline of Land Plots LA911377 and LA513894
- Pre Consultation Scheme Extents

Client

highways
england

ARCADIS

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The Gateway
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Consulting Office
The Gateway
Leeds City Centre
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Project

A585 WINDY HARBOUR JUNCTION TO SKIPPOOL IMPROVEMENT

Title

LAND INTEREST PLAN - THE BEECHES, 205 MAINS LANE, POULTON-LE-FYLDE FY6 7LB

LA911377 AND LA513894

REGULATION 5(2)(i)

SHEET 1 OF 1

Status	FOR INFORMATION	Revision	02
Scale	1:500		
Drawn	T.Rankin		
Checked	P.Thomas		
Approved	N.Henderson		
Project No	UA009921	Original Size	A3
Drawing Number:	HE548643-ARC-LLO-SZ_ZZ000_DR-D-3031		

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