

Central Lancashire Local Plan 2023-2041

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012



Regulation 19 Pre-Submission Plan

REPRESENTATION FORM

The easiest way to submit your comments is online at <https://centrallocalplan.citizenspace.com/planning/cllp-regulation-19-representation-period/> . Alternatively, you can scan the QR code on the right, using a smartphone, to be taken to the webpage. **We would encourage you to use the online form wherever possible.** Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



Submission form

This form has two parts-

Part A – Personal Details: need only to be completed once. **We will not be able to accept responses where personal details are not provided.**

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make relating to each individual policy.

You will be asked to give details of why you consider the policies of the Local Plan to be sound or unsound, please be as precise as possible. You will also be asked to set out the modification(s) you consider necessary to make the Local Plan policies sound in respect of any soundness matters you have identified. You will need to say why each modification will make the policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Privacy Notice

If you have any questions about how the Central Lancashire Authorities will handle your personal data, please see our Data Protection Policy Statement or contact us via email at centrallancashireplan@chorley.gov.uk

- Chorley Privacy Statement: <https://chorley.gov.uk/privacy>
- Preston Privacy Statement: <https://www.preston.gov.uk/article/1231/Data-protection-policy-statement>
- South Ribble Privacy Statement: <https://southribble.gov.uk/privacypolicy>

Part A: Personal Details*

We will not be able to accept responses where personal details are not provided.

1. Please provide your contact details.

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in the Person Details boxes below but complete the full contact details of the agent in Agent Details.*

	Representor Personal Details	Agents Details (if applicable)
Title		Mr
First Name		Andrew
Last Name		Bickerdike
Job Title (where relevant)		
Organisation (where relevant)	Lilford (2005) Ltd	Turley
Address Line 1		Level 5, Transmission
Address Line 2		Atherton St
Town		Manchester
Postcode		M3 3GS
Telephone number		██████████
Email address		████████████████████ ██████
What authority do you live / work in? (Chorley, Preston, or South Ribble)		

Part B: Please use a separate sheet for each representation you wish to make

Name or Organisation:	Lilford (2005) Ltd
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3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

Comment being made against:	Reference (please provide)
Policy:	
Paragraph:	
Development Site:	
Policies Map:	
Evidence:	SHELAA (Appendix 5 Site Profile 7)
Other (Please state):	

4. Do you consider the Local Plan is:

	Please check the relevant box	
	Yes	No
1) Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
2) Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	<input checked="" type="checkbox"/> In relation to this specific item	<input type="checkbox"/>
a) Positively prepared	<input checked="" type="checkbox"/> In relation to this specific item	<input type="checkbox"/>
b) Justified	<input checked="" type="checkbox"/> In relation to this specific item	<input type="checkbox"/>
c) Effective	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	In relation to this specific item	
d) Consistent with national policy	<input checked="" type="checkbox"/> In relation to this specific item	<input type="checkbox"/>
3) Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Central Lancashire Local Plan does not comply with).

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See accompanying written representation and Development Framework for full comment.

Having regard to the Council's assessment we would note and comment on the following conclusions within the SHELAA (Appendix 5 Site Profile 7) with which we would agree:

- The site suitable, available and achievable.
- All identified constraints are likely to be able to be mitigated.
- Some development is required in Tier 5 settlements (which includes Bretherton) to meet the housing requirement and, in this context, the development is small scale.
- The site is deliverable between 2027 and 2029
- The site has access to utilities
- It should be appropriate to develop this site for more vulnerable purposes given its location in Flood Zone 1
- Impacts on the adjacent Conservation Area can be adequately mitigated

- Changes to the setting of the Conservation Area will not affect the significance of the asset or the appreciation of it providing mitigation measures are put in place.
- Impacts identified in the IA can be mitigated.

We would comment on the following observations in the SHELAA with respect to the site:

- Sustainability Appraisal – most of the impacts identified are not specific to the site and would be identified in respect of any site within Bretherton. These have to be weighed against the strategic need for some development in Bretherton, justified for the reasons set out above. Further, the size of the site is such that it provides a critical mass of development and so optimising the ability to mitigate any impacts and being preferable, in terms of overall impact in respect of the points presented, to an alternative of more piecemeal development across the village drawing on several smaller sites;
- Highways/transport – as above most of the constraints are not specific to the site and would be identified in respect of any site within Bretherton. These have to be weighed against the strategic need for some development in Bretherton, justified for the reasons set out above.
- Summary of constraints – this identifies that allocations in Tier 5 settlements are required to meet the housing requirement as there is insufficient land available in Tiers 1-4. We do not agree with this logic. Development is needed in Tier 5 settlements (appropriate in scale to the settlements) to secure their long term sustainability – see para 3.16 of the Regulation 19 Local Plan. The need for development in Tier 5 exists in its own right and is not relative to the capacity limitations within Tier 1 to 4 locations as suggested.
- Flood risk – this identifies that the site is at risk from surface water flooding. Whilst this is noted based on the Environment Agency mapping, it is noted that this same designation applies to most land around Bretherton and so there are no sequentially preferable alternatives in the context of a need to deliver some development in Bretherton. Any practical risk, notwithstanding application of the sequential approach, can be addressed through an effective surface water drainage strategy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	Please check the relevant box
No, I do not wish to participate in hearing sessions	<input type="checkbox"/>
Yes, I wish to participate in hearing sessions	<input checked="" type="checkbox"/>

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Lilford (2005) Ltd owns and is promoting site HS2.6.

Participation in the hearing session is necessary to enable oral evidence in relation to the site's suitability and deliverability to be presented in the context of the comments provided in this form regarding the Council's appraisal of the site, some which we do not agree with, albeit not to the extent that a fundamental soundness issue is presented.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Third Floor, Town Hall, Lancaster Road, Preston, PR1 2RL by filling in this representation form.

Forms must be received by midnight on Monday 14 April 2025.

