

14 April 2025

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Regulation 19 Consultation
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CENTRAL LANCASHIRE LOCAL PLAN REGULATION 19 CONSULTATION: REPRESENTATION ON BEHALF OF LILFORD (2005) LTD

HOUSING ALLOCATION REF: POLICY HS2.6 – LAND AT SOUTH ROAD, BRETHERTON (SHEELA REF: 19C233X) This representation to the Central Lancashire Local Plan (Regulation 19 consultation) is provided on behalf of Lilford (2005) Ltd (The Lilford Estate) relating to its land ownership in the settlement of Bretherton, Chorley.

Executive Summary

- The Lilford Estate supports the proposed allocation of the land at South Road, Bretherton for residential development (Allocation ref. HS2.6) in the Regulation 19 Local Plan.
- The site is located within a strong housing market area where development is generally viable. It will support the long term sustainability of the village as a place to live and support the need for local housing for this purpose.
- There are no significant on site or off site constraints which would undermine the development of site through regulatory restrictions or abnormal costs associated with the site.
- The site is located outside of the Green Belt, well contained by existing development and with a frontage to South Road, facilitating access to the developed site and achieving an effective and sensitive integration with the village
- The site represents a sustainable and deliverable development allocation. It is appropriate in scale for Bretherton and yet compared to a more dispersed approach to meeting the village's development needs:
 - is large enough to deliver a broad range of dwellings
 - will avoid additional adverse impacts on the village and its' character
 - will secure additional general and bespoke benefits to the village in contributing to a sustainable future.

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- An outline planning application for the development of the site is currently being prepared and will be submitted to Chorley Council for determination shortly. The Lilford Estate would welcome early discussions with the Local Authority regarding this proposal in order that the site is able to contribute to meeting Bretherton and the wider Borough's housing needs in the short term

The Lilford Estate in Bretherton

The Lilford Estate has a long standing connection to Bretherton and its development as a village over many years. Both the previous and current Lord Lilford have sought to maintain a significant legacy in Bretherton.

The Lilford Estate maintains a strong agricultural legacy in Bretherton; many of the farms and surrounding agricultural land in Bretherton are within the Lilford Estate's ownership. The majority of these agricultural holdings have been occupied by the same local families in Bretherton for generations and is a key generator of local jobs.

Further many of the open spaces and land now used for community facilities in Bretherton were formerly within the ownership of the Lilford Estate including the football pitch, tennis court, children's playground, bowling green, boules pitch and War Memorial. Others, including the Bretherton Cricket Club and Clay Pits, still remain in the Estate's ownership.

The Lilford Estate covers over half of the Bretherton Neighbourhood Plan Designated Area. Against this backdrop, the Lilford Estate has engaged extensively in the preparation of the Bretherton Neighbourhood Plan, setting out a proposal for investment in new and improved facilities and amenities within the village and supporting a neighbourhood level planning policy framework which facilitates this. Its latest representations to the Draft Neighbourhood Plan set out an ambition for the Estate's to positively use its land interests to make Bretherton:

'...a great place to live which provides its residents with the facilities, homes, civic infrastructure and access to green space which they need.'

The Estate's engagement in this process is ongoing.

It is recognised that the Central Lancashire Local Plan has a broader remit than the Neighbourhood Plan and its evidence base. However the Council's ongoing consideration of the Local Plan, as it relates to the Estate's land interests and comments below, and its subsequent Examination, should be considered in the context of the above points.

Interaction between the emerging Bretherton Neighbourhood Plan and Central Lancashire Local Plan

The draft Bretherton Neighbourhood Plan is being progressed broadly at the same time as the Local Plan, with consultation on a pre-submission draft of the former commencing on 14th April 2025.

The pre-submission draft Neighbourhood Plan notes the intention of the Central Lancashire Local Plan to allocate land at South Road, Bretherton (Allocation ref HS2.6), to which this representation relates, for residential development. It is otherwise silent on the treatment of this land. It does not present any proposal **specific to this land** which would be at odds with the principle of an allocation for residential development.

The Neighbourhood Plan is required to 'support the delivery of strategic policies contained in local plans or spatial development strategies'¹. To this end, it should be aligned with, informed by and seek to deliver the Local Plan. The Local Plan functions as the parent plan in this regard and, in the context of strategic conflict, the Local Plan would take precedence, albeit the Neighbourhood Plan may be prioritised if conflict is more localised and does not offend the strategic function of those conflicting Local Plan policies.

¹ National Planning Policy Framework paragraph 13

As noted, the Local Plan has a broad remit. Of note, it, and its evidence base, seeks to define development needs across the plan area and identify how these should be distributed. This need is defined by reference to the plan area as a whole, of which Bretherton is a part.

Conversely, the evidence base for the draft Bretherton Neighbourhood Plan does not seek to define a general development requirement for the plan area and instead focuses on specific needs having regard to demographic indicators based on the existing population of the village. For plan making purposes, that is an insufficient basis on which to define future development needs for an area, albeit may be a useful informant of such a process.

The evidence base of the draft Bretherton Neighbourhood Plan is therefore not a reliable basis on which to define and plan for the full development needs of the village. This reflects that this is the purpose of the Local Plan and its evidence base. They therefore have complementary but not overlapping roles in this regard. To that end, the respective evidence bases of the Local Plan and the Neighbourhood Plan, and indeed the emerging plans themselves, are not in conflict as to the principle of the allocation of land at South Road for development.

Notwithstanding this, the Neighbourhood Plan is yet to be submitted for Examination and so it, and its evidence base, has not been independently assessed. For the purposes of the onward development of the Central Lancashire Local Plan, the Draft Neighbourhood Plan is not therefore a material consideration to be taken into account.

Key comments on the Local Plan

As noted, for the purposes of the Local Plan, the Lilford Estate owns and is promoting the land proposed for allocation for residential development at South Road, Bretherton in the Draft Plan (Allocation ref HS2.6 relates). This representation should be read alongside the accompanying Development Framework relating to this site.

The comments which follow are presented in the context of this specific land interest and its proposed treatment in the Local Plan.

Meeting development needs and spatial distribution

Whilst not wishing to comment on the detailed process of defining the overall development need for Central Lancashire and its distribution across the three authorities, it is noted that the total proposed requirement of 1,314 dwellings per annum (See Policy HS1) is somewhat below the level of historic delivery across the area over recent years (1,738 dwellings per annum achieved on average in the 11 years to 2023/24)².

This gap between past delivery and proposed growth is also significant in Chorley where an average of 510 dwellings per annum have been delivered on average over 14 years to 2023/24 against a proposed requirement for 334 dwellings per annum through the new Local Plan (Policy HS1).³

Evidently there has been strong market demand for new housing and in the context of the Government's stated direction to significantly boost the supply of new homes⁴, the step to set requirements below historic delivery rates is questionable, raising issues around the Plan's compliance with national planning policy as a point of principle.

In respect of the distribution of residential development, it is noted that the proposed approach is broadly aligned with Option 1 (Roll forward the current approach) assessed within the Integrated Appraisal (IA). On this matter, the IA concludes Option 1:

'...maintains a settlement hierarchy based approach. The main focus for new development remains on the urban areas (Preston and South Ribble) and towns (Chorley and Leyland/Farrington), complimented by a

² Table 3 of the Central Lancashire Housing Study Update (December 2024) (Evidence document HO9) [ho9-central-lancashire-housing-study-update.pdf](#)

³ Table 8 of the Chorley Authority Monitoring Report (November 2024) [authority-monitoring-report](#)

⁴ National Planning Policy Framework paragraph 61

*lesser focus on urban and rural local service centres. This spatial approach maintains the current urban structure. The distribution of housing requirements between the three council areas in Policy HS1: Scale of Housing Growth and Distribution of Housing Requirements (see Chapter 6) further reinforces this spatial approach.*⁵

Inherent within this is a hierarchical approach in respect of settlement size and status and maintenance and reinforcement of the status quo via development being directed to different settlements on this basis.

This compares with Options 2 and 3 which reflect a greater focus on urban areas and extensions with no reference to 'local service centres'. The appraisal of Option 1 in the IA notes this being a more 'balanced' approach as a result.

Achieving a sustainable future for all settlements

As a point of principle, the Lilford Estate considers it vitally important that a spatial approach is taken which provides a vehicle for all settlements to be able to accommodate the development they need to be sustainable in the long term.

In respect of smaller settlements, this may be achieved in the context of any of the Options considered given the relatively small numbers required to achieve this objective. This objective therefore can and should be a constant and fixed component of all of the Options and not reliant on Option 1 being selected, notwithstanding that it has been for the purpose of the Regulation 19 consultation.

In this regard, we would point to inherent threats to the long term sustainability of many smaller settlements resulting from a number of micro and macro level issues. Typically they are the least affordable for working families with local households constrained in their ability to meet their housing needs. They also often have an aging population which undermines the sustainability of certain services and facilities and do not have the critical mass of population more generally for services to be sustained on a profitable or cost-effective basis – be they services provided by the private or public sectors. The closure of post-offices, public houses or the withdrawal of bus services or loss of funding for community facilities is a common indicator of this.

This point, and the need for a proportionate level of new development within smaller settlements, is acknowledged within the Draft Plan. The Lilford Estates supports this acknowledgement. On this matter paragraph 3.16 states that:

An appropriate level of development in smaller and rural settlements is important in supporting the economic vitality and viability of local communities. The type of development proposed in all settlements must be appropriate to the scale and character of the settlement, its place in the hierarchy and local community needs. South Ribble and Chorley have a number of rural settlements to the east and west of the boroughs

Sites for development are identified, and allocated, in the Draft Plan in the context of the above.

The Bretherton context

Bretherton is not immune from these issues and evidence would support the conclusion that Bretherton is facing into such challenges and threats. This supports the need for 'an appropriate level of development' as intended to address this. In this regard, it is noted that:

⁵ Paragraph 415 of the Integrated Assessment of the Central Lancashire Local Plan Pre-Submission Local Plan - Main Report (January 2025) (Evidence document CD3) [Integrated Assessment of the Central Lancashire Local Plan](#)

- Based on the 2021 census 21.4% of the population of Bretherton was aged 65 or above, against a national average of below 17% with the proportion of people ages 75 or above in Bretherton expected to rise to 12.4% against 7% in 2038⁶
- The average house price in Bretherton in 2024 was £535,000 – the second highest of any settlement in Chorley⁷
- The median house price in Bretherton is 13.8x the median household income, compared to a Chorley average of 5.1x. This is the highest ratio in Chorley by some margin⁸

The provision of a proportionate level of new development in Bretherton is an important part of the response to these issues. This can:

- Provide homes for working age households in the spirit of creating a more balanced and mixed demographic and supporting the viability of services
- Provide affordable homes
- Provide the market with additional housing options and in turn support a natural resetting of house prices
- Provide Section 106 funding to invest in the creation of new or improvement of existing civic infrastructure.

The Lilford Estate is in a unique position in its ability to contribute to the above outcomes via utilising its significant land ownership across Bretherton. Residential development at South Road is an enabler of the delivery of the Estate's vision and masterplan for Bretherton, as set out in its representations to the Bretherton Neighbourhood Plan and centred on achieving a more socially, environmentally and economic sustainable future for the village.

Land at South Road, Bretherton – a sustainable and deliverable local scale residential development opportunity

Land at South Road, Bretherton is selected for allocation for residential development in the context of the above points. The Estate fully supports this proposed allocation which is broadly reflective of its ambition for the site.

The Development Framework accompanying this written representations presents an overarching masterplan for the delivery of this site, demonstrating how it can come forward in a manner which is considerate to its landscape and heritage setting, integrates effectively with the wider village, responds to on site and localised environmental constraints and sensitivities and delivers a high quality and attractive housing environment.

The site is suitable and available for development and its development as proposed is achievable.

Suitability

In considering suitability we would point out the following strategic attributes of the site:

- It is located outside of the Green Belt and within the settlement boundary of Bretherton.
- It has a frontage to South Road – the main thoroughfare running through Bretherton – enabling easy access to the site without use of smaller rural and residential roads

⁶ Table 5.7 and para 208 of the Bretherton Housing Needs Assessment (January 2023) [Report \[NA Name\] 2021-07-19](#)

⁷ Table 3.3 Chorley Borough Housing Demand and Need Assessment 2024 (December 2024) (Evidence document HO10) [ho10-chorley-housing-need-and-demand-assessment-2024-final-report.pdf](#)

⁸ Table 3.13 Chorley Borough Housing Demand and Need Assessment 2024 (December 2024) (Evidence document HO10) [ho10-chorley-housing-need-and-demand-assessment-2024-final-report.pdf](#)

- The majority of the site is enclosed by built development to the north, east and west and thus its development would present itself as an infill of a 'gap site', integral to and part of the village without extending the boundary of the village or encroaching into open countryside
- The site is of an appropriate scale for a development within Bretherton whilst at the same time being large enough to:
 - a) Provide a variety of dwelling types and sizes
 - b) Provide some affordable homes
 - c) Meet the village's immediate needs in one location and so mitigating the need for a more piecemeal approach utilising several sites across Bretherton which is likely, on a cumulative basis, to have an adverse impact on the village and its character

These points demonstrate that the site possess characteristics which, in combination, mean that it presents a highly sustainable option for meeting the village's development needs – maximising benefit and minimising harm - with no reasonable alternative available.

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 agreed

- 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.

At the strategic level, the site is not affected by any site specific constraints. Whilst further work is required as part of a future planning application to test the proposed form of development and identify necessary mitigation measures, it is noted that there are no strategic environmental impediments to the site being developed. Of note, it is not a form of recreational land, is not subject to any ecological designations, is not located within Flood Zone 2 or 3, does not contain any listed buildings and is not situated within a Conservation Area. The absence of such impediments would support the conclusion that the site is suitable for allocation for development.

Available

The site is wholly owned by the Lilford Estate and its delivery for development is not reliant on any third part ownership.

The Lilford Estate is a 'willing landowner' in respect of the development of the site and is an experienced land promotor, working with its retained consultants, Acland Bracewell, to bring forward a number of residential development on its land within the North West of England.

Achievable

The site is located within a strong housing market area where development is generally viable.

There are no significant on site or off site constraints which would undermine the development of site through regulatory restrictions or abnormal costs associated with the site.

To this end, the site represents a sustainable and deliverable development allocation, appropriate in scale for Bretherton and able to bring a number of general and bespoke benefits to the village in contributing to a sustainable future.

The Lilford Estate is thus supportive of the proposed allocation of the land at South Road, Bretherton (Allocation ref: HS2.6) in the Regulation 19 Local Plan. It looks forward to further opportunities to engage in the development of the Local Plan and working with the Council and community to bring forward this sustainable development site in the short term.

An outline planning application for the development of the site is currently being prepared and will be submitted to Chorley Council for determination shortly. The Lilford Estate would welcome early discussions with the Local Authority regarding this proposal in order that the site is able to contribute to meeting Bretherton and the wider Borough's housing needs in the short term

Yours sincerely,



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