

**THE CENTRAL LANCASHIRE LOCAL PLAN 2023-2041 (“THE PLAN”)
HEARING SUBMISSION RE DRAFT SITE ALLOCATION 7
SHEELA REFERENCE 19C233x, 19C072 / ALLOCATION REFERENCE HS2.6
AMANDA NICHOLSON
3rd November 2025**

This submission is in opposition to the above proposed site allocation (Site Proposal 7). It is genuinely hard to imagine a more inappropriate site in Bretherton, for a plethora of reasons outlined infra, to be considered for any form of housing development let alone the current proposal for 26 houses.

Careful consideration has been given to the “Examination Guidance Note From The Inspectors” and the “Matters, Issues and Questions” document to ensure all relevant aspects have been considered and addressed in this Hearing Statement.

RESPONSES TO INACCURACIES / ERRORS IN SITE PROPOSAL 7

A) JUSTIFICATION states:

“The development is small scale”. Incorrect.

Bretherton is a small Tier 5 settlement with some 675 residents (2021 Census).

NPPF2025 para 73 and Town and Country Planning (Development Management Procedure) (England) Order 2015 classifies a development as “MAJOR” if it meets any of the listed criteria which include:

10 or more homes, and
the site is more than 0.5 hectares; both these criteria are met and,
in addition, only “limited infill development in villages” (this is an “infill” site).

Since the commencement of The Plan time frame 24 new properties have been built / are being completed in Bretherton – 23 at Orchard Meadow (site by Bank Hall) and 1 detached house by the cricket pitch. These sites were appropriate and did not negatively impact on other village houses. There is also an empty property currently on the market which has further small-scale development / enlargement potential – being the usual way Bretherton has developed.

It follows that any housing unit numbers for Bretherton during the life of The Plan, even based on the site proposal number, for a Tier 5 settlement have practically been met. The site proposal does confirm – “there is a very limited range of services and facilities” in the village. Under current guidelines 24 new homes satisfies the requirement that “some development” is necessary (as site proposal states).

Site proposal 7 conveniently ignores these 24 new properties.

B) "SITE ASSESSMENT – SUITABILITY" – Proposal states "YES". Incorrect.



Above photograph was taken 1st January 2025 from South Road of the site area. At least three quarters is covered by surface water flooding. Not the 2.69% area misleadingly stated in the proposal. (Page 22 - "2.69% of the site is at high risk of surface water flooding.") A site already at such a high coverage of surface water flooding, and that area increasing with climate change, is wholly unsuitable for ANY housing under guidelines including the new NFRA2.

Any development creates impermeable areas on a site as well as speeding up the rate of "run off". The site is not suitable for sufficient SUDs measures to mitigate this increased flooding.

The Environment Agency map, used by gov.co.uk to assess surface water flooding, shows the site is a known surface water flood area and is assessed in the highest band for frequent flood events. As a result of climate change these instances of both intensity and frequency of surface water flooding are increasing significantly and for the first time this January the flood waters reached the hedge at the rear of The Apiary bungalows.

The site proposal is between the existing Bretherton Conservation Area (which includes Iron Farm and Iron Farm Barn both directly abutting the site) on the west side and lower lying bungalows on The Apiary on the east side. The site has sizeable ridges up to three feet high as well as three ponds - a large central pond (fully in the site) connected by a channel to a second pond which lies equally between the site and the adjoining Recreational Ground (which is being designated a Local Green Space) and the third pond (also fully in the site) being to the rear of The Apiary bungalows.

This topography of the field is vital to its function as a surface water reservoir / flood plain and as per NFRA2 this is a prime consideration that negates against site development.

C.1) SUMMARY CONSTRAINTS in proposal – lists only some of negative constraints on site and most are incomplete / inaccurate:

“Poor public transport services” – Bretherton Neighbourhood Plan Steering Committee has been successful in the reinstatement of one bus route through the village however vehicular use is still required to access some basic facilities. Each new house now has up to 5 vehicles. There is no mention of the current gridlock that occurs in the centre of the village at drop off and collection times of the primary school. South Road becomes vehicle bound, as per below photo with stationary vehicles and lorries as far as can be seen, and cars cannot get into or out of Bamford’s Fold, South View and Weavers Fold. Nothing can move until the school timetable allows. Any further vehicles in this area (let alone those potentially associated with 26 houses at this section of South Road) will exacerbate this situation and be detrimental to the normal lifestyle of people in surrounding houses / roads trying to get to doctors, dentists, vets and other time sensitive appointments at certain times.



“Record of sewer flooding”. An Environmental Information Request from United Utility (copy can be provided) advises the drainage system installed when Bamford’s Fold was built is “hydrostatically inadequate” and cannot be connected into. The drain passes by 5 and 6 South View and regularly blocks both by usage and after heavy rain fall causing localised surface water flooding as per photograph below.

There are also incidents of sewage discharge onto the lane which can be a health hazard as the lanes are popular walking routes for families.



This means regular mechanical pump outs have to occur. This negatively impacts on the normal usage of people in surrounding houses. South View is single track and photograph below shows how intrusive such pumping currently is to residents - this is the view at the front of my home showing there is no way to access or leave the property at these times. This situation will become worse as any development is on land between these problems and the main sewer pumping system in Croston which itself already has severe flood issues.

N.B My office is in Croston and has flooded three times hence my personal knowledge of that village.



“Site at risk surface water flooding”. Flood information in proposal assumes any risk is from river / coastal flooding. This does not apply to the site. This site is at high risk of surface water flooding – see Environment Agency map referred to supra. The topography of the entire field and the existence of the 3 sizeable ponds and one connecting channel has created a surface water reservoir / flood plain which stores vast amounts of surface water preventing significant flooding of all the surrounding properties until the water soaks away. See further information on surface water flooding infra.

“Heritage /archaeology – “impacts can be mitigated.” Incorrect. The site, for example, directly abuts two of the most important properties in Bretherton Conservation Area so no “mitigation” is possible.

“Sustainability” – The Plan does not show there “is insufficient land available in Tiers 1-4”. The site proposal deliberately ignores the 24 new properties built since The Plan’s inception date.

C2) SUMMARY CONSTRAINTS omitted from Site Proposal 7:

BIODIVERSITY

I have lived in Bretherton for some 30 years. My home has an extensive joint boundary with the field some 100 plus feet long. I am passionate about wildlife and uniquely placed to advise on the status of the field and its sad deterioration over this time. I have a duckery in the garden and am in the garden several times a day all year round, so am acutely aware, on a daily basis, of the quality of the land, presence of wildlife, drainage etc. The hedge separating the field and my garden has been assessed at over 150 years old and creates numerous habitats for wildlife, including hedgehogs which are becoming critically endangered.

When I came to Bretherton the field (Site 7) was a vibrant mixed habitat for wildlife. The main pond in the centre (effectively the “village pond” as it is adjacent to the footpath that was the ONLY north / south route through the village prior to vehicles) had a broad band of mixed vegetation surrounding it. This was just one of three ponds (two of which are connected by a channel) all of which supported a plethora of wildlife.

The jewel in the crown, for me, was the lapwings that bred on the field. I would stand for hours watching their aerobatic flight, christening them “Loopy Lapwings” due to this unique flight.

Not only have lapwings been lost from the field, but also, inter alia, yellow hammers; tree & house sparrows; yellow wagtail; green finch – all Birds of Conservation Concern 5 British Trust for Ornithology. Also no longer visiting the field are, inter alia, curlews, oystercatchers, reed buntings and dunnocks all on the amber list.

There were many dragonflies, damselflies, and, inter alia, peacock, red admiral, comma and other butterflies. The ponds also support significant populations of amphibians - Great Crested Newts, Palmate Newts and Smooth Newts as well as common frogs and toads. Quite an achievement for one site – according to Wildlifetrusts.org this is a complete UK amphibian collection save for two specialist environment amphibians - natterjack toads and marsh frogs.

Part of a wall in my pigsty fell down last year (this building is adjacent to the field) and out fell Great Crested Newts, Palmate Newts and Smooth Newts. In order to save them I placed them briefly in a bucket – see photo below – whilst I very quickly built best hibernaculum I could manage and hopefully they have all settled in and are thriving. This shows how important this site is for all newts – and how devastating its loss would be especially for Great Crested Newts which are nationally red listed as critically endangered. This is a unique wetland site in

Bretherton which cannot be replaced or mitigated as a site of importance for biodiversity – once lost it is gone for ever. Other sites which are suitable for affordable small scale are within the Parish of Bretherton and would not have to decimate these populations.



SURFACE WATER FLOODING ADJOINING LAND

The field has developed, as stated, over many decades into a surface water floodplain / reservoir. Initially the rainfall was contained within the ponds, channels and ridges of the field until it could naturally soak away. As climate change consequences increase this ability is failing more and more. Surface water now drains from the field in volume into my garden.

Photo 1



Photo 2



I have had to install a mains powered below ground pumping chamber (it is beyond the fencing on left hand side Photo 1) between my duckery and the field to try and drain away surface water flooding from the field. The water goes from the pump through a new pipe into the ditch at the end of my garden, this continues (via a 90 degree bend to right) along the rear boundaries of 3, 4, 5 and 6 South View. The pump cannot cope with the volume of surface water now coming from the field. I cannot afford the electricity, nor should I have to, to 'drain the field'. The 2 photographs above (sorry I cannot separate them – beyond my techno ability !!) are just examples I can provide over several years of the surface water flooding which now occurs several times a year and can last for several weeks in wet spells.

Due to climate change, including increased rainfall, the surface water can no longer be contained within the field now. In consequence the field now drains, in part, into my rear garden. This area is regularly under water from side to side. I laid 18inch flags as stepping stones to allow access during floods. These were soon swamped, so I laid a second flag on each one. These also are now under water during heavy rainfall and significant surface water floods onto my land – the depth of which is now over 3". I have had to install, at my own expense, a below ground mains powered pumping chamber to try and divert some of the water from the field into the ditch that goes to the end of my garden then turns 90 degrees right and continues behind 3,4,5 and 6 South View. As the water levels have increased this pumping chamber cannot cope with the volume of surface water which pours from the field. Nor can I afford the electricity cost of running the pump 24/7 to "drain" the field for the owners. I have raised this with the agents on several occasions – no remedial steps have been undertaken at all. Any development – even to a very limited extent - will increase this surface water flooding to more of the surrounding properties and increase occasions of drain blockages.

Several approaches to the agents over the years re this situation have not elicited any action.

ANTHRAX

There is first hand resident and documented evidence of anthrax outbreaks in the early 1950's. Ormskirk was a collection hub for livestock at this time hence the spread of diseases in the north west. I am advised the infected cattle were buried within the site proposal area under the supervision of police.

Anthrax (from the Latin for 'black' as the skin lesions have a black centre) causes 2 conditions in humans. Firstly, skin lesions - these can successfully be treated with antibiotics, secondly, and of more concern, are spores which can frequently be fatal in humans if they become lodged in the lungs – hence the reason infected cattle corpses were buried to avoid the spores spreading. Physical interference with these sites, as in foundation works, can allow spores to become airborne. Such a risk, even if small, is too serious to dismiss and weighs against site development. Further as the land is already at high risk of surface water flooding this could allow the spores to escape into the water courses via ditches etc.

TIER 5 SETTLEMENT

Bretherton is a "small settlement" and has, arguably, already fulfilled its housing quotient for The Plan period. The current houses were built on land that did not negatively affect the surrounding properties. This site 7 is inappropriate for any development based on any criteria in the NPPF, NFRA2 and all other planning guidelines.

IN CONCLUSION:

1. THE SITE PROPOSALS IDENTIFIED CONSTRAINTS ARE UNABLE TO BE MITIGATED
2. THE UNIDENTIFIED CONSTRAINTS OMITTED FROM THE SITE PROPOSAL (and listed herein) ARE UNABLE TO BE MITIGATED
3. THE SITE PROPOSAL HAS CONCERNING INCORRECT DETAILS, including:
 - The proposal is not SMALL SCALE, and
 - The site has HIGHEST LEVEL OF SURFACE WATER FLOODING which is affecting adjoining land now
4. SEQUENTIAL TEST – designed to ensure new development is directed to sites with the lowest probability of flooding. This site has highest risk of surface water flooding according to government / Environment Agency map. Land agents proposing site have advised they represent owners whose combined lands equate to some 1,500 acres in Bretherton Parish collectively own some 1,500 acres in Bretherton. Sustainable alternative sites could therefore be considered if it was determined that there should be a total 26 houses in Bretherton i.e to build 2 more to join the 24 recently built.

OF NOTE:

PLANNING APPEAL REF: APP2024/0028/01

Planning appeal for Boundary Lane, Hesketh Bank. Planning was refused last year due to surface water flood risks – the same as affect the field and surrounding land in this site proposal.

PLANNING APPEAL REF: APP/D2320/W/23/3329702

Stated, inter alia, “The Framework seeks to ensure that development is steered away from areas at risk of flooding. It sets out that where flood risk is identified within a site, from any source, then the Sequential Test should be applied.”

The site was subject to surface water flooding, as in this site proposal.