

Central Lancashire Local Plan (CLLP) Examination

Statement to Matter 5 on behalf Lilford (2005) Limited (Representor ID A62)

6 November 2025

This Statement is provided on behalf of Lilford (2005) Limited (hereafter, 'Lilford 2005') and relates to its land interest at South Road, Bretherton which is subject to draft allocation HS2.6 of the CLLP.

Lilford 2005 is the sole owner of this site. It is Lilford 2005's position that this site represents a sustainable development opportunity, utilising land outside of the Green Belt and within the settlement boundary of Bretherton. The site is being actively promoted for development by its owner and is available for development in full during the plan period.

Its allocation as proposed is aligned with the overall strategy for the CLLP, providing a modest scale of development suited to its context within the established settlement of Bretherton.

Site HS2.6 will make an important contribution to meeting the residential development needs of Central Lancashire and the settlement of Bretherton more specifically, being the only sustainable site opportunity capable of doing so. The site is deliverable and can come forward in full during the next five years.

Housing allocations – Chorley (Policy HS2)

5.2 Is each site allocated for residential development sound? In particular:

a) Have the site constraints been appropriately taken into account in the allocation of the site?

e) Is there evidence that the development of the allocations is viable and developable during the plan period?

We present a single comprehensive response to the overlapping issues raised at 5.2 and specifically sub-questions 5.2a and 5.2e.

Site HS2.6 is capable of being viably delivered during the early years of the plan period and satisfies the relevant tests of developability.

The site is within a strong housing market area and is not affected by any insurmountable or unusual constraints which might otherwise present a compromising financial burden on development.

This is demonstrated through the site Development Framework submitted at part of Lilford 2005's Regulation 19 representations to the Local Plan. This presents a

deliverable masterplan for the site informed by a full consideration of its physical context and constraints.

This demonstrates how the site 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.

In respect of the site's availability, suitability and achievability, attention is drawn to Document HO14c (Strategic Housing and Economic Land Availability Assessment (SHELAA) Appendix 5: Chorley Site Profiles) (Site Profile 7). This presents an appraisal of the site carried out by the plan making authority for the purposes of the Local Plan. This reports that, in respect of the site's development potential, it is:

Suitable, available and achievable. All identified constraints are likely to be able to be mitigated.

Lilford 2005 agree with the **overall conclusion** presented within Site Profile 7 as summarised above and drawing on the evidence presented within the Site Profile proforma. Some of the key considerations in drawing this conclusion are presented in further detail below.

The Site Profile 7 proforma outlines, correctly, that the site is controlled by a willing landowner, actively promoting the site for development (that being Lilford 2005). It correctly notes that initial design work, comprising the Development Framework submitted as part of Lilford 2005's Regulation 19 representations, has been carried out, demonstrating that the site can come forward for the scale and form of development proposed in an acceptable manner.

The Site Profile 7 proforma goes on to set out some common environmental considerations which the development of the site engages. This includes in relation to surface water flood risk.

This is a constraint and designation affecting much of the Local Plan area, including most proposed allocations, but is readily capable of mitigation through implementation of an effective surface water drainage strategy.

Following the 2025 update to para 027 of the Planning Practice Guidance, the issue of surface water flood risk does not automatically engage the sequential test, and a need to consider alternative (sequentially preferable) sites. In relation to applying requirements of para 175 of the NPPF on this matter, the update states:

'... a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the

*development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied”.*¹

In accordance with the above, this matter can be dealt with through the site specific flood risk assessment and drainage strategy. Surface water flooding does not therefore present a constraint which would bring the suitability of the site’s allocation into question.

The Site Profile 7 proforma identifies other site specific environmental considerations relating to heritage, utilities and transport which will need to be taken into account as part of the delivery of the site. None of these are considered to present unusual or insurmountable constraints and are readily resolvable through a considered scheme design and appropriate (and standard) mitigation, as reflected in the form of development presented within the Development Framework submitted as part of Lilford 2005’s Regulation 19 representations.

The Site Profile 7 proforma draws attention to a general lack of service provision within Bretherton. However, Lilford 2005 would note that the village is an established settlement and community, accommodating services commensurate with its rural service centre role. This includes a primary school, pub, cricket club and village green. Bus services also operate through the village.

Further, as outlined in Lilford 2005’s Matter 2 Statement, the village has a development need which must be met to secure its long term sustainability. In this context, a modest scale of development in the settlement, reflective of the HS2.6 allocation, is appropriate.

Attention is also drawn to Document IT05 (the Central Lancashire Local Plan Viability Report) which concludes that both brownfield and greenfield development is viable within the defined ‘higher value’ zones of the Plan area (Allocation Site HS2.6 falls within such a zone)². In the context of a site which is not affected by any unusual constraints which indicate additional costs might be incurred in its development, this provides added certainty that the site is developable.

More broadly, we would note the following strategic attributes of the site which support the position that the site is suitable for development:

- It is located outside of the Green Belt and within the settlement boundary of Bretherton.

¹ National Planning Practice Guidance: Paragraph: 027 Reference ID: 7-027-20220825
Revision date: 17 09 2025

² CLLP Evidence Base Document IT05 para 10.2

- 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.
- The majority of the site is enclosed by built development to the north, east and west and it presents itself as a ‘gap site’, which is integral to and part of the village such that its development wouldn’t result in the boundary of the village extending 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:
 - Provide a variety of dwelling types and sizes.
 - Provide some affordable homes.
 - 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.

We would comment on the following points within the Document HO14c Appendix 5 Site Profile 7 proforma 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. That is 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 incapable of mitigation;

- **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 *in any event* (see Matter 2 statement). The need for development in Tier 5 exists in its own right and is not relative to any capacity limitations within Tier 1 to 4 locations which may exist.

At the strategic level, the site is not affected by any insurmountable 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, the site 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.

Lilford 2005 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 developments on its land within the North West of England.

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.

Site HS2.6 is therefore developable and its allocation is sound.

5.2 b) Are the various requirements set out in the policy clear, justified and effective?

Whilst there is no site specific policy associated with the allocation, rather the formal allocation of the site is via a general allocations policy which relates to a number of sites in Chorley (Policy HS2), the delivery of the site will be subject to other policy provisions of the Local Plan covering a wide range of topics.

Working together, the application of these policies will ensure that the development which comes forward on the site is sensitive to its context, appropriate in scale and form and incorporates appropriate mitigation where needed.

5.2c) Have the indicative yield, development mix and viability considerations been adequately addressed?

On the matter of viability, attention is drawn to Lilford 2005's response to Question 5.2e above.

Further, attention is drawn to the Development Framework prepared and submitted by Lilford 2005 as part of its representations to the Regulation 19 consultation which demonstrates the site's development potential, informed by a full consideration of the site's constraints. This shows how the site can be developed to deliver a high quality, place-led scheme of 25-30 family homes provided within a strong landscape framework well related to the wider settlement of which the scheme will form an integral part.

The site's capacity, as broadly reflected in the policy allocation, is informed by this. This provides a sound basis to determine capacity and its indicative mix for plan making purposes.

5.2d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?

Site HS2.6 is of a modest scale and to that end, its development will not give rise to the need for major infrastructure improvements specific to this scheme. However, if small scale improvements in local infrastructure are required (such as an increase in education capacity) this can be secured through Draft CLLP Policy ID2 (Developer Contributions and Planning Obligations), the requirement for which would be determined through the future planning application process.

In the context of the scale of the development, this provides sufficient certainty that any infrastructure improvements which may be needed will be forthcoming without a further consideration of this matter through the Local Plan.

Further, it should be noted that Lilford 2005 is freehold owner of large parts of the village of Bretherton and the community facilities it accommodates, including sports and recreational land within the settlement, such as Bretherton Cricket Club.

Lilford 2005 has a long history of investment in the village and its civic infrastructure. This is part of Lilford 2005's aspiration to leave a positive legacy in the village utilising its land holdings and make Bretherton a sustainable place to live, offering a high quality of life for its residents. Recent investments include the donation of the land accommodating the war memorial within the village to the Parish Council and donation of £7,500 towards upgrading the children's playground in the village.

Lilford 2005 is committed to continuing to invest in the village and its community as part of an overall strategy to enhance the village and ensure it provides the facilities, infrastructure and services that the community and village needs.