

**Central Lancashire Local Plan
(Regulation 19) Consultation**
Representation on behalf of Stokers Ltd

April 2025

Turley

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1. Introduction

- 1.1 These representations are submitted by Turley on behalf of Stokers Limited (Stokers) in response to the Central Lancashire Local Plan (CLLP) Regulation 19 consultation.

About Stokers

- 1.2 Stokers are a family business which was originally founded in Ormskirk. They are one of the oldest furniture retail businesses in the North-West of England, starting out in 1985, and currently have ten stores (including Doorway to Value, Chorley) across the region.
- 1.3 The Doorway to Value (DtV) furniture retail store was first established in 1965 on Seymour Street, in Chorley town centre and has continued to grow over the last 60 years, establishing a reputation locally for providing high quality furniture and housing big name brands.
- 1.4 Following a period of rapid growth, the business relocated to the current site at Whittle-le-Woods, Chorley in the mid-1970's and experienced steady expansion over the next 30 years. In 2002 the store was extensively refurbished, and additional floorspace was constructed in 2006 and again in 2022, providing an opportunity to enhance the range of products available to customers.

Doorway To Value Site

- 1.5 The Site extends to approximately 1.29 hectares and is occupied by an existing commercial unit (Use Class E), which comprises retail floor space with associated storage and administrative accommodation.



Figure 1.1: The DTV Site marked red, and Additional Land marked blue (Google Earth, 2023)

- 1.6 Also within the Site, to the south and west of the furniture store, is hard surface car parking for visitors and staff, with vehicular access/egress to the A6 from the north-west and south-west. Existing landscaping is situated along the western boundary of the Site, abutting the A6. A gated area of hard surfacing is also located to the north of the store, providing staff parking and delivery access. To the east and north-east, the Site boundary is landscaped with tree planting and a grass embankment.
- 1.7 An additional parcel of land to the north (hereafter referred to as the “Additional Land”) comprises a vehicle repairs facility and a residential dwelling, bounded to the north by the B6229 Moss Lane, which defines the existing settlement boundary of Whittle-le-Woods. This land is within separate ownership.
- 1.8 The Site and the Additional Land (see **Fig.1.1**) is located entirely within the Central Lancashire Green Belt, bound to the north by the defined settlement area of Whittle-le-Woods (Policy V2) and to the east by an Area of Separation (Policy BNE4), as set out within the Chorley Local Plan (adopted 2015).
- 1.9 The Site is located on the periphery of Whittle-le-Woods, c.2.5km north of Chorley town centre and c.10km south of Preston. To the north, the Site shares a common boundary with a vehicle repairs facility and a residential dwelling (‘the Additional Land’), beyond which lies Moss Lane and further residential development.
- 1.10 To the north-west (c.65m) of the Site is Rotheram Top Farmhouse, a Grade II listed building. A BP Fuel Garage, SPAR shop and post office are also located to the north-west, with Shaw Hill Golf Resort beyond. Land to the west of the Site, across the A6 Preston Road, is dominated by residential properties, with the golf resort and open fields beyond. To the south, the Site is bounded by a single residential property, beyond which lies the Sea View Inn public house. The eastern boundary of the Site

comprises an embankment which slopes up to a series of farm buildings, with agricultural fields beyond stretching down to the M61 motorway.

- 1.11 The location of the Site in close proximity to the A6 makes it highly accessible by a wide range of transport modes. There are two existing direct access points from Preston Road (A6), a busy highway which provides links to the larger conurbations of Preston and Chorley, as well as the strategic road network, including links to Junction 8 of the M61 via the A674 to the south, the M6 and M65 to the north and Preston to the north-west.
- 1.12 There are a number of bus stops located within reasonable walking distance of the Site. Two bus stops are located on the A6 Preston Road, within c.150m of the store entrance, providing connections to Chorley, Leyland, Preston and Bolton. A third bus stop, located c.800m to the south of the Site, providing connections to Chorley, Preston and Withnell.
- 1.13 Chorley Railway station is located c.2.9km to the south of the Site, which provides frequent services between Preston, Leyland, Buckshaw Parkway, Adlington, Blackrod, Bolton, Salford Crescent and Manchester Piccadilly. The Stagecoach 125 Gold bus service provides an onward connection from the station to the Site.
- 1.14 In 2022, planning permission¹ was granted for an extension to the existing building. This permission was granted due to the very special circumstances test being met for development in the Green Belt. The extension has now been constructed.
- 1.15 In summary the DtV site (“the Site”) and the Additional Land are located within the Green Belt but almost entirely comprise built development and associated hard surfacing.

Representations

- 1.16 Stokers seeks removal of the Site from the Green Belt, and its inclusion within the settlement boundary of Whittle-le-Woods.
- 1.17 In order to provide a clear and recognisable Green Belt boundary which is likely to be permanent, in accordance with Paragraph 149f of the National Planning Policy Framework (‘the Framework’), these representations also promote the removal of land to the north of the Site (‘the Additional Land’), as described in further detail below.
- 1.18 Stokers seeks the removal of the Site and Additional Land from the Green Belt to provide a greater degree of certainty and flexibility for further expansions and changes to the business as needed to meet market changes and to secure the longevity of the business in the locale area.
- 1.19 Accordingly, these representations respond to the draft Green Belt and Policy EN15 of the Central Lancashire Local Plan (CLLP) Regulation 19 consultation in the following sections.

¹ 21/01465/FUL (Chorley Council)

2. Vision

2.1 The Plan sets out the vision for Central Lancashire during and beyond the plan period:

“Central Lancashire will be a place where people want to live, visit, work and invest. New development will be sustainable, supporting our ambitions of carbon neutrality and addressing climate change.

Growth and regeneration of our city and town centres and delivery of new employment opportunities will continue to strengthen economic prosperity, making Central Lancashire a key economic centre for the North West.

A wide range of high-quality sustainable new housing and supporting infrastructure will meet the needs of our diverse communities, delivering vibrant and distinct places. Community wealth building and inclusivity will be at the heart of Central Lancashire’s growth.

Our heritage assets will be conserved, and our natural environment will be protected and enhanced for its intrinsic value whilst providing opportunities for recreation and leisure. Throughout Central Lancashire, people’s health and well-being will be enhanced through the creation of well-designed developments, delivering homes, jobs and prosperity.”

2.2 Stokers support this vision and welcome the particular emphasis on encouraging investment and delivering new employment opportunities to strengthen economic prosperity.

2.3 The vision as set out in the Plan is considered to be positive and to meet the tests of soundness as set out in the National Planning Policy Framework (NPPF) paragraph 36.

2.4 Stokers’ detailed comments regarding the Plan relate to draft Policy EN15, and the Green Belt boundaries proposed for adoption.

2.5 These are discussed in the next two sections of this statement.

3. Policy EN15 – Areas of Green Belt

- 3.1 Paragraph 36 of the Framework requires that for Plans to be considered ‘sound’, they must be:
- Positively Prepared
 - Justified
 - Effective
 - Consistent with National Policy
- 3.2 Draft Policy EN15 specifies the types of development which, subject to normal planning considerations and the criteria of the policy, would be acceptable within the Green Belt. Stokers do not dispute the function of the policy.
- 3.3 However, it is considered that the Policy is inconsistent with the provisions of the Framework relating to the Green Belt, and the objectives of both the Framework and the draft CLLP in relation to economic growth.
- 3.4 The Framework (paragraph 154(c)) seeks to resist extensions to existing buildings within the Green Belt which are disproportionate in scale relative to the size of the original building. Criterion C of Policy EN15 of the CCLP goes further than this however and seeks to limit such extensions to no more than 30% of the size of the original building. The draft Policy is, therefore, inconsistent with the Framework and can be considered unsound.
- 3.5 EN15’s presumption against extensions of >30% of the original building (as built or existing in 1948) fails to recognise that businesses such as Stokers evolve in the same location over an extended period of time in response to consumer and market demands and that the ‘current’ building at the time of an application may already be more than 30% larger than the original building having regard to incremental additions over many years.
- 3.6 It also fails to recognise that larger proposals may not necessarily appear disproportionate in scale and may not be materially more harmful to the openness or purposes of the Green Belt than a smaller proposal, if sited and designed appropriately; it effectively prejudices impacts.
- 3.7 Further, the proposed arbitrary limitation of 30% would require most businesses (other than those seeking very modest adjustments) to demonstrate very special circumstances (VSC) to justify their proposals; a very high policy test which would run counter to the wider objectives of the Framework and the CLLP regarding economic growth. In the case of Stokers, it would introduce uncertainty and limit the ability of the business to continue to evolve quantitatively and qualitatively. These evolutionary improvements have and continue to be essential to the sustainability and longevity of the retail business as they seek to compete with online retail, helping to protect existing jobs, whilst also creating additional employment opportunities.

3.8 Stokers consider that Criterion (c) of Policy EN15 is **unsound** by virtue of being inconsistent with national policy.

4. Whittle-le-Woods Settlement Boundary and Green Belt

- 4.1 The updated policies map associated with the draft Plan retains the Site and “Additional Land” to the north, within the Green Belt and outside of Whittle-le-Woods settlement boundary.

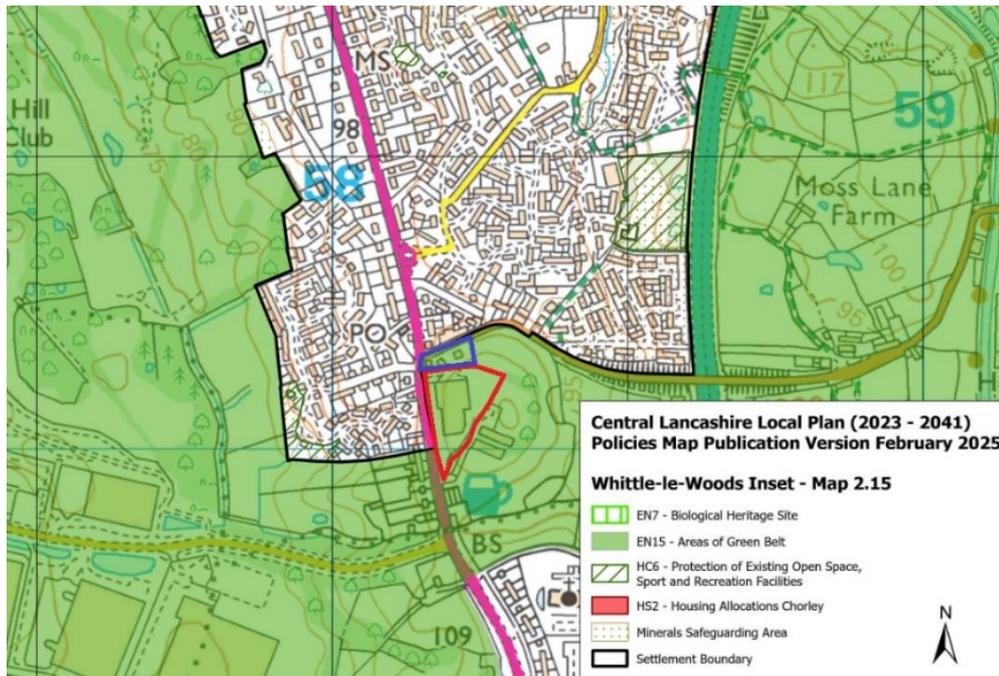


Figure 4.1: Extract of the Central Lancashire Reg.19 Local Plan Policies Map (DtV Site outlined in red and the Additional Land outlined in blue)

- 4.2 In accordance with Paragraph 145 of the Framework, Green Belt boundaries should only be altered where ‘exceptional circumstances’ have been fully evidenced and justified. Paragraph 149b of the Framework confirms that when defining Green Belt boundaries, plans should “*not include land which it is unnecessary to keep permanently open*” and must “*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*”. [our emphasis]
- 4.3 As set out above, the Site is located entirely within the Central Lancashire Green Belt, and therefore it must be demonstrated that exceptional circumstances exist in order for the Green Belt boundary to be amended through the forthcoming Local Plan.
- 4.4 In order to ensure the amendments to the Green Belt boundary in this location are clearly defined, in accordance with Paragraph 149f of the Framework, it is requested that the Additional Land (as described above) also be removed from the Green Belt. Collectively, these two parcels of land are hereby referred to as ‘the Site’.
- 4.5 The remainder of this representation sets out Stokers’ considerations of the ‘exceptional circumstances’ which justify the proposed removal of the Site from the

Green Belt and its inclusion within the defined settlement boundary of Whittle-le-Woods. This includes; reviewing how the Proposal Site functions against the aims and purposes of including the land within Green Belt; and demonstrating that exceptional circumstances exist including supporting sustainable development and making effective use of land.

Impact on Purposes of Including Land within the Green Belt

4.6 The Framework confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and permanence (Paragraph 142). As such, the Green Belt serves five purposes (Paragraph 143):

- i. to check the unrestricted sprawl of large built-up areas;
- ii. to prevent neighbouring towns merging into one another;
- iii. to assist in safeguarding the countryside from encroachment;
- iv. to preserve the setting and special character of historic towns; and
- v. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.7 The following paragraphs consider how the Site functions against the purposes of including land within the Green Belt and confirms why its removal from the Green Belt will cause no harm to the overall function and purpose of the Central Lancashire Green Belt in this location.

(i) To check the unrestricted sprawl of large built-up areas

4.8 The Green Belt around Chorley and Whittle-le-Woods as a whole makes a significant contribution to checking the unrestricted sprawl of these settlements². However, the Site does not contribute to this purpose. The Site is on the settlement edge of Whittle-le-Woods and includes existing built development, which is read as part of the settlement, rather than as land which is open. Therefore, removal of the Site from the Green Belt will not harm this purpose and will not undermine the contribution which this part of the Green Belt makes to checking the unrestricted sprawl between Chorley and Whittle-le-Woods as a whole.

(ii) To prevent neighbouring towns merging into one another

4.9 The Green Belt in this location as a whole performs a significant contribution³ in preventing the merging of the neighbouring towns; as a result, they remain separate and distinct conurbations.

4.10 The Site is on the edge of the urban area at Whittle-le-Woods and includes existing built development, which is read as part of this settlement. Land beyond the Site, to the east, contributes to preventing Chorley merging with neighbouring towns such as

² CLC Green Belt Assessment Fig.4.2 (October 2022)

³ CLC Green Belt Assessment Fig.4.3 (October 2022)

Blackburn. Between the Site and these towns is the M61 motorway and the West Pennine Moors which further emphasise the existing separation. The removal of the Site from the Green Belt will not harm this purpose overall.

(iii) To assist in safeguarding the countryside from encroachment

- 4.11 Whilst the Green Belt parcel has been assessed to ‘significantly contribute’ to this purpose⁴, the Site itself has little, if any, meaningful characteristics of the countryside. It is perceived as forming part of the urban area, rather than as countryside.
- 4.12 This is due the presence of built development on and surrounding the Site, including the existing furniture store (including recent extension), vehicle repair garage and residential property, alongside the surrounding residential and commercial development to the south and west, and road infrastructure including the A6 Preston Road to the west. Simply put the countryside has already been encroached upon and release of the Site will not harm this purpose of the Green Belt as a whole to any material degree.
- 4.13 The Site does not comprise land which is read as part of the countryside and the revised Green Belt boundary will be defined by the agricultural development to the east of the site, as shown within **Fig 1.1** above.

(iv) To preserve the setting and special character of historic towns

- 4.14 The Green Belt in this location does not contribute⁵ to preserving the setting or special character of historic settlements to any significant degree, therefore no harm will arise to this purpose if the Green Belt boundary is altered in this location.

(v) To assist urban regeneration by encouraging the recycling of derelict and other land

- 4.15 This purpose will not be compromised by the removal of the Site from the Green Belt and its inclusion within the defined settlement boundary of Whittle-le-Woods. The Site comprises a mix of existing retail, commercial and residential development, including a furniture store, vehicle repair garage, residential dwelling, hardstanding, car parking, and landscaping. As such, the Site is more readily perceived as forming part of the existing urban area. No harm will arise to this purpose if the Green Belt boundary is altered.
- 4.16 Overall, it is considered the Site does not make a significant contribution to the aim or purposes of including land within the Green Belt, and therefore the alteration of the boundaries to remove the Site would not cause harm to the purposes of the Green Belt as a whole.

A Defensible Green Belt Boundary

- 4.17 The removal of the Site from the Green Belt, will enable the creation of a clear and recognisable Green Belt boundary, in accordance with Paragraph 149f of the Framework. As set out above, the Site is read as part of the existing urban area, rather

⁴ CLC Green Belt Assessment Fig.4.4 (October 2022)

⁵ CLC Green Belt Assessment Fig.4.5 (October 2022)

than the countryside. The eastern boundary of the Site is defined by a well-established belt of trees, which are protected by a TPO. The southern extent of the site defines the settlement edge of Whittle-le-Woods. The Site represents a clear and recognisable boundary upon which to define the Green Belt.

Exceptional Circumstances

- 4.18 The removal of the Site from the Green Belt, and its inclusion within the defined settlement boundary of Whittle-le-Woods, will help achieve many benefits which support sustainable development and make effective use of land, in accordance with the Framework. These benefits comprise the exceptional circumstances to support the Sites' removal from the Green Belt.

Sustainable Development

- 4.19 There are key benefits of the business being located in this specific location.
- 4.20 The Framework requires that when reviewing Green Belt boundaries "*...the need to promote sustainable patterns of development should be taken into account*" (Paragraph 148). Building a strong, responsive and competitive economy lies at the heart of achieving sustainable development; achieving sustainable development being the purpose of the planning system⁶. Paragraph 85 acknowledges that significant weight should be placed on the need to support economic growth and productivity. The draft vision of the Regulation 19 Plan specifically aims to attract investment, and Strategic Objective 4 of the draft Plan specifically aims to provide "*...a range of employment and economic growth opportunities in sustainable locations*".
- 4.21 The removal of the Site from the Green Belt, and its inclusion within the defined settlement boundary of Whittle-le-Woods, is pivotal to the ongoing sustainability of the Stokers business. It will provide certainty and will support Stoker's objective of securing the flexibility required to meet constantly changing market demands and the evolving physical retail landscape. Such flexibility for future investment is essential to securing the long-term financial sustainability of a local business, enabling it to respond to changing market and economic conditions, particularly in light of changes to consumer behaviours.
- 4.22 In its determination and approval of planning application 21/01465/FUL, Chorley Council acknowledged the business model of the DtV store and its trading requirements. They accepted that there were no suitable or available sites within the urban area which were capable of accommodating the DtV store in its existing or extended format and that, even if suitable alternative sites did exist, it would not be feasible for the DtV store to relocate given the considerable level of investment already embedded in what is a destination store and its facilities over many years. It also acknowledged the contribution which the store makes to the local economy including through creation of jobs and how these positions could be compromised if the physical format of the store is prevented from evolving in a manner which responds to market demands and conditions and loses trade as a result.

⁶ As defined by the Framework, Section 2, Paragraph 8

- 4.23 Indeed, the recent extension has successfully secured the existing jobs, and created new additional local jobs. A total of 38 people are employed at DtV, with the majority living locally.
- 4.24 Furthermore, the Site is highly accessible by a range of transport modes and benefits from connections to the strategic highway network, in accordance with Paragraph 110 of the Framework and Strategic Objective 5 of the draft Plan.
- 4.25 Having regard to the above, the very limited contribution which the Site makes to the purpose of including land within the Green Belt and to the economic consequences of DtV being able unable to expand and respond to market demands, it is self-evident that the exceptional circumstances required to remove land from the Green Belt are demonstrated.
- 4.26 The removal of the Site from the Green Belt will reduce these restrictions, allowing future redevelopment proposals to be brought forward (in line with other adopted planning policies), safeguarding the viability of an established local business, and ensuring DtV can continue to support economic prosperity in Chorley, in accordance with Paragraph 85 of the Framework and the vision/objectives of the emerging Plan.

Making Effective Use of Land

- 4.27 The Framework promotes the effective use of land in meeting local needs, including retail uses (Paragraph 124). Paragraph 127 confirms that planning policies should reflect changes in the demand for land and requires local planning authorities to, as part of local plan updates, reallocate land for a more deliverable use that can help to address identified needs.
- 4.28 Furthermore, the Framework confirms that when defining Green Belt boundaries, local plans should “...not include land which is unnecessary to keep permanently open” (Paragraph 149b). Similarly, development should be situated in sustainable locations which can be accessed by a range of transport modes (Paragraph 110).
- 4.29 The Site is on the settlement edge of Whittle-le-Woods and comprises existing built development, which is read as part of the settlement, rather than as land which is open. It contributes little to the openness of the Green Belt or its purposes. As such its retention within the Green Belt is unnecessary and it should be removed in accordance with Paragraph 149b of the Framework.
- 4.30 The inclusion of the site within the Green Belt, and exclusion from the settlement boundary, is considered to be unsound and exceptional circumstances exist which justify its removal.

5. Summary

- 5.1 Stokers welcome the opportunity to engage with the Central Lancashire Local Plan Regulation 19 consultation.
- 5.2 Stokers have two concerns with the Plan in its current form:
1. **Policy EN15 is unsound** as it is unduly restrictive and is inconsistent with National Policy.
 2. The proposed **inclusion of the Site within the Green Belt** and outside of the settlement boundary is **unsound** as it is not justified and is inconsistent with National Policy.
- 5.3 We would welcome the opportunity to discuss the contents of these representations further with officers and reserve the right to attend any future examination hearing sessions.

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