



Central Lancashire Local Plan 2023-2041: Regulation 19 Publication Version Consultation

Response on behalf of Story Homes

Project Ref: 333102124 | Date: April 2025

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Document Control Sheet

Project Name: Central Lancashire Local Plan

Project Ref: 333102124

Doc Ref: Core Representations

Report Title: Response to the Central Lancashire Local Plan: Regulation 19 Publication Version Consultation

Date: April 2025

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Revision	Date	Description	Prepared	Reviewed	Approved
v1	08.04.25	Draft	BT	IG	DM
v2	14.04.25	Final	BT	IG	DM

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1 Introduction

1.1 Overview

- 1.1.1 Stantec UK Ltd (hereafter referred to as “Stantec”) has been appointed by our Client, Story Homes (“Story”) to prepare this representation to the Regulation 19 version of the Central Lancashire Local Plan (“CLLP”), which is being prepared by Chorley Council, Preston City Council and South Ribble Borough Council (“the Central Lancashire Authorities” or “the Authorities”), in partnership with Lancashire County Council.
- 1.1.2 The emerging CLLP is expected to guide future development within Central Lancashire. It comprises strategic and development management policies, which also identifies site allocations for development within the area, during the 2023 to 2041 plan period.
- 1.1.3 The reason for Story’s interest in the emerging CLLP is because it controls land within the plan area which it proposes to be allocated for residential development (including land which the CLLP proposes to allocate and which it omits). Given the nature of our Client’s interests, we focus on providing responses to policies which relate to strategic housing development within this representation and relevant Development Management policies. These representations are accompanied by individual site submissions and appendices.
- 1.1.4 We set out up front that the Central Lancashire Authorities’ proposed approach to development, as set out in the emerging CLLP, is fundamentally contrary to the national imperative to build more homes and the strong guidelines set out by Government in the form of the National Planning Policy Framework (“NPPF”) and Planning Practice Guidance (“PPG”). The Authorities have sought to artificially adjust their approach to housing to seek to benefit from the transitional arrangements contained within the latest version of the NPPF, which was published in December 2024; **resulting in an unsound Plan**. Our client has significant concerns regarding the methodology undertaken and the decision taking basis the Authorities have relied upon in the formulation of this Local Plan Regulation 19. It is Story Homes position that the Authorities should withdraw this Plan and prepare a new Local Plan that follows the new standard methodology correctly and seeks to significantly boost the supply of much needed homes across Central Lancashire.

1.2 ‘Regulation 19’ Representations

- 1.2.1 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the publication of a Local Plan prior to its submission to the Secretary of State for examination.
- 1.2.2 At this stage of the Plan preparation process, the regulations require representations to focus on whether the Central Lancashire Authorities have complied with legal requirements and the soundness tests as defined in the National Planning Policy Framework (‘NPPF’). The tests of ‘soundness’ are concerned with the following questions:
 - Has the Local Plan been ‘Positively prepared’? – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - Is the Local Plan ‘Justified’? – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

- Will the Local Plan be 'Effective'? – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- Is the Local Plan 'Consistent with national policy'? – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

1.2.3 These representations provide a commentary on the Regulation 19 Publication version of the emerging Plan in respect of the extent to which it is 'sound'. At the outset, we note that it is our Client's position that the CLLP requires modification to be found 'sound' for the reasons documented within this representation, including the failure of the Plan to ensure that the Central Lancashire's future development needs are met in full and fundamental concerns in respect of how the spatial strategy proposed within the CLLP has been derived.

1.3 Structure of this Representation

1.3.1 For ease of reference, the structure of this representation follows that adopted by the Central Lancashire Authorities in the CLLP; we comment on and analyse those elements of the CLLP which are considered pertinent to our client's land interests, and where we wish to express our support, objection, or general observations. The intention is that our comments will assist the Authorities in progressing a Plan which can be found 'sound'.

1.3.2 This representation should be read in conjunction with the following documents which are submitted alongside this representation:

- Central Lancashire Housing Needs review, produced by Stantec on behalf of a consortium of developers including Story Homes;
- Central Lancashire Housing Supply review, produced by Stantec on behalf of a consortium of developers including Story Homes;
- Representation in Respect of Central Lancashire Local Plan Viability Assessment, produced by Roger Hannah on behalf of a consortium of developers including Story Homes;
- Site-proformas for Story Homes individual site interests (plus relevant appendices).

2 Vision, Objectives and Spatial Strategy

2.1 Vision

- 2.1.1 We accept the overall general thrust of the ‘vision’ set out in the CLLP, insofar as it aspires to establish a positive direction for *growth* across Central Lancashire. We are particularly supportive that the vision states:

“...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.... Throughout Central Lancashire, people’s health and well-being will be enhanced through the creation of well-designed developments, delivering homes, jobs and prosperity.”

- 2.1.2 Likewise we are particularly encouraged by Strategic Objective 3 (‘Sustainable Communities’), which states:

“To create healthy, vibrant, safe, and sustainable communities with a diverse range of housing to meet future needs. Providing a scale and mix of housing types and sizes and a variety of tenures in a range of locations to meet economic aspirations and local housing needs.”

- 2.1.3 Whilst we support the aspirational tone set out within the stated vision and associated objectives, these aspirations are not matched by the policies set out within the emerging CLLP.
- 2.1.4 As we go on to discuss in Section 3 of our response, the proposed housing requirement is suggested to equate to 80 per cent of the area’s latest Local Housing Need (“LHN”) requirement based on the Government’s latest standard methodology, but just 79.1 per cent of the plan area’s LHN, when taking account of the latest March 2024 affordability data. It is clear that Central Lancashire Authorities’ approach is predicated upon meeting the minimum requirement to benefit from the transitional provisions set out at NPPF2024 paragraph 234a, on the basis that the Regulation 19 consultation commenced prior to 12 March 2025. However, we are of the firm view that the Central Lancashire Authorities position has been reached on an unsound basis and that it be advancing a plan which fails to meet the area’s latest LHN in full.
- 2.1.5 It is only by establishing policies which set out a mechanism to meet the area’s full housing needs, that the stated vision and objectives can be achieved. As such, we strongly encourage the Central Lancashire Authorities to be more ambitious in its approach and ensure that the ensuing CLLP policies are cognisant of these aspirations. Such an approach would align with the requirement for the Plan to be ‘positively prepared’ as required by NPPF paragraph 36.
- 2.1.6 Indeed, we note in relation to Chorley, for example, that the CLLP seeks to omit draft Green Belt allocations from its Preferred Options draft of the CLLP resulting in the Borough being unable to meet its own objectively assessed housing need (instead seeking to relocate that housing requirement to Preston); indicative of its negative approach to planning for Chorley.
- 2.1.7 This approach is notwithstanding the key role that land released from the Green Belt, including safeguarded land has played in delivering housing across Central Lancashire during the previous plan period.

2.2 Objectives – Economic Prosperity

- 2.2.1 Many of the points raised within these representations speak to the approach taken in the CLLP to identifying and delivering the housing needs of the borough. As set out in Chapter 3 of these representations, housing needs in Central Lancashire have been calculated (by the Authorities) including allowance for economic led housing needs. We comment on the failure of the CLLP to meet that economic led uplift later in these representations (alongside a commentary on meeting wider housing needs) and those comments will not be repeated here.
- 2.2.2 Distinct from the above, we also consider that the CLLP fails to plan for its economic land needs through the plan period and specifically fails to plan positively to capitalise on the economic assets within the plan area. Turley have provided a Critique of the Planned Provision of Employment Land in the Draft Central Lancashire Local Plan which provides an overview of the employment land provision implications for meeting the Council's economic aspirations. Specifically, Turley then goes on to address the impact of provision on the National Cyber Force (NCF) headquarters currently progressing on Samlesbury EZ expected to be occupied from 2025.
- 2.2.3 The approach of the CLLP must be seen in the wider context for promoting sustained economic growth since the change in UK Government in July 2024. The new Government's mission is to "restore economic growth," with a strong focus on infrastructure, planning reform, job creation, and sectoral innovation; including reforms to the NPPF in December 2024 to accelerate housebuilding and economic growth.
- 2.2.4 The Invest 2035 strategy, identifies priority growth sectors such as advanced manufacturing, defence, and digital technologies – all directly relevant to Central Lancashire. A forthcoming Defence Industrial Strategy, supporting innovation and regional prosperity through defence investment.
- 2.2.5 At the regional level, Lancashire's strategic focus aligns with national priorities with Lancashire County Council (LCC) and the newly formed Lancashire Combined County Authority (LCCA) advancing economic strategies that prioritise strategic employment land, investment in innovation hubs, and infrastructure to unlock growth.
- 2.2.6 The Samlesbury Enterprise Zone – particularly with the National Cyber Force (NCF) HQ – is highlighted as a growth nucleus, alongside other Central Lancashire development sites.
- 2.2.7 The Emerging Lancashire Growth Plan proposes a £20bn investment over 10 years, calling for additional strategic employment sites beyond 2035, especially to meet growing global investor demand for large, specialised sites.
- 2.2.8 This strategic context could not be clearer on the need for ambitious, future-facing local plans that accommodate investment, employment growth, and housing aligned to sectoral strengths—especially in advanced manufacturing, cyber, and defence.
- 2.2.9 Notwithstanding this clear direction, the CLLP has taken the decision to reduced employment land provision, as informed by the updated Employment Land Study (ELS), compared to the earlier drafts of the Local Plan. Our Client's key concerns reflect the lack of response of the CLLP to the above context and include the:
- Omission of major investments like the National Cyber Force (NCF) HQ at Samlesbury Enterprise Zone;
 - Doubts raised by B8 Real Estate over whether the identified sites can meet full employment needs across the plan period;

- Failure to reflect strategic priorities, such as the Lancashire Combined County Authority's call for large-scale employment sites (particularly to support NCF).
- Failure to address a sustained need for employment land in Central Lancashire - particularly to attract potential occupiers and realise economic benefits linked to the NCF. The current supply is unlikely to fully meet this demand.
- Failure to recognise key housing opportunities within the proximity to the NCF and major road corridors to support that growth.
- The limitations in evidence and its policy translation result in a failure to plan proactively for modern economic needs, contrary to NPPF guidance (paragraphs 85 and 86).

- 2.2.10 The above conclusions are drawn in context of the Statement of Common Ground (SoCG) between the Central Lancashire Authorities and Lancashire County Council (LCC). The SoCG sets out that LCC identifies Central Lancashire as key to regional economic growth, particularly in high-value sectors such as digital, cyber, technology, and advanced manufacturing. Achieving this growth depends on allocating and assembling suitable employment sites.
- 2.2.11 An Employment Land Study commissioned by the Authorities provides an Objectively Assessed Need (OAN) of 172.87 hectares, split across Chorley, Preston, and South Ribble. The planned employment land supply exceeds this requirement, providing a total of 199.96 hectares, with a contingency buffer.
- 2.2.12 While LCC supports the overall land provision, it emphasises the importance of allocating strategic sites suitable for specialised sectors and long-term growth; especially with the Samlesbury Enterprise Zone expected to reach capacity early in the plan period. LCC has urged the Authorities to retain and allocate new strategic sites, but the SoCG reports that the Authorities believe the current supply meets needs, in line with the Spatial Strategy that prioritises growth in existing urban areas.
- 2.2.13 We understand that ongoing collaboration between the Authorities and LCC continues with additional evidence being prepared to assess future strategic and sector-specific needs and there is an expectation that this may lead to an earlier review of the plan if warranted.
- 2.2.14 Notwithstanding the pragmatic conclusions of the SoCG, we consider that it demonstrates clearly that despite the input of LCC and the clarity it has provided on the economic needs of the region and how that relies on the CLLP, the Plan has opted for an economically undercooked plan. The result is that the Plan will not plan effectively to meet its own reported aspirations for growth including, as set out later in these representations, those which underpin its economic led housing needs.
- 2.2.15 The Plan should seek to respond to the potential for complementary investment and emerging needs linked to the National Cyber Force (NCF) and address how housing development could support additional floorspace and workforce demands.

2.3 Spatial Strategy - Policy SS1: Development Patterns

- 2.3.1 It is essential that the Plan should not prevent the delivery of sustainable developments coming forward, in the locations where the demand for such schemes is arising. Based on our review, it appears that the CLLP (and its chosen allocations) has not been prepared based on the purported spatial strategy within Policy SS1, but instead the proposed development patterns set are predicated primarily on the availability of sites which have been assessed favourably within the SHELAA (a process we also have objections to, set out later in these representations). The

identified development patterns should be predicated on a robust spatial strategy, which proposes to accommodate local housing needs, in the locations where such need has arisen or is projected to arise due to economic objectives. As such, we object to draft Policy SS1 on the basis that insufficient justification has been provided as to how the development patterns proposed by Policy SS1 have been derived.

2.3.2 In particular, we would like to draw attention to the approach to Green Belt within draft Policy SS1, which states: *“The Green Belt in Central Lancashire will continue to prevent urban sprawl by keeping land permanently open.”*

2.3.3 Having reviewed the evidence based which has been produced in support of the emerging CLLP, it is not clear how this position has been justified; in particular in the context of the currently adopted Central Lancashire Core Strategy which does release Green Belt land. We note that the Authorities have published a very short, two page note entitled ‘Housing and Employment Allocations: Site Selection Process’ (Ref: H016). In respect of Green Belt release, which states:

“Chorley had unmet need against the housing requirement set out in the Housing Study however Preston and South Ribble were able to meet this unmet need therefore a redistribution of the Housing Study requirements was applied. As such Green Belt release in Chorley was not required and could not be justified.”

2.3.4 We do not consider that the Central Lancashire Authorities have provided sufficient or robust evidence to conclude that no exceptional circumstances exist to justify maintaining the extent of the existing Green Belt. We take the view that the exceptional circumstances which clearly existed to justify the review of Green Belt boundaries (and inclusion of Green Belt Allocations) remain extant at this juncture. Indeed, the clear direction provided by the Government on the imperative to address the national housing crises (including a significant uplift in the housing needs for Central Lancashire) indicates that those circumstances are even more exceptional than assumed in the previous Preferred Options draft of the CLLP. The Authorities omission to grapple meaningfully with that assessment indicates a significant failure to advance a positively prepared Local Plan and, at the very least a significant failure to be transparent in the process which has led to that decision.

2.3.5 In addition, we consider that the conclusion contained within the ‘Site Selection Process’ Note (Ref: H016) stating that there is no justification for release of Green Belt land in Chorley because that need can be met elsewhere (in Preston and South Ribble) is flawed. We set out in our Housing Land Supply Assessment (on behalf of a Consortium of developers and housebuilders) that the Authorities have overstated their housing land supply position, particularly in Preston and that the resultant inflated housing requirement (to accommodate Chorley’s needs) cannot be met. Furthermore, our supply work also demonstrates that each of the authorities are likely not to be able to demonstrate a 5-year supply of housing on adoption of the CLLP. In that regard, we consider that it cannot be justified to omit readily deliverable Sites within Chorley in favour of relying on undeliverable Sites in Preston or South Ribble.

2.3.6 It is essential that the Central Lancashire Authorities are able to robustly demonstrate that the spatial strategy is deliverable and underpinned by a proportionate evidence base which has then informed the allocation of land to meet that strategy. As it stands, the development patterns proposed by Policy SS1 appear to be based on the identification of sites, without due consideration as to whether those sites are in the right locations to address local housing needs, and respond to economic factors, owing to a flawed site selection process, which go on to discuss further below.

- 2.3.7 Furthermore, the ‘Critique of the planned provision of Employment Land in the Draft Central Lancashire Local Plan’ report produced by Turley on behalf of Storey Homes has determined that there is a likely underestimation of the employment land need set out within the draft Local Plan. The likely underestimation of need raises considerable doubt around whether the Authorities claimed employment land supply totalling around 218ha will be sufficient.
- 2.3.8 The profile of proposed spatial strategy fails to respond to the Lancashire Combined County Authority’s Lancashire Growth Plan 2025 – 2035 (February 2025), which identifies of a need for a new generation of large strategic sites to be planned for to realise its economic growth ambitions and capitalise on planned investment. Given its location at the heart of the arc of growth in Lancashire, and the concentration of investment in the growth sectors in the cyber and defence sectors within Central Lancashire, this omission represents a significant failure to plan positively and support the needs of the modern economy, as required explicitly by the NPPF (paragraphs 85 and 86).
- 2.3.9 In order for Central Lancashire’s growth needs to be met in full, development should come forward in the areas where the needs for such development are arising; particularly where we consider that the CLLP proposed alternative locations to meet unmet need are undeliverable. We consider that insufficient justification has been provided to demonstrate that exceptional circumstances no longer exist to justify the lack of Green Belt release, in order that the area’s development needs are met full where they arise. Moreover, we consider that the proposed change in approach taken by the Authorities is unjustified and illogical in the face of increased pressure to boost the delivery of housing nationally and given the stark need for significant levels of affordable housing, particularly in Chorley. We make the case that the CLLPs revised purported approach to its spatial strategy is contrived around meeting the minimum requirement provided by the NPPF2024 to benefit from the transitional arrangements for Regulation 19 Local Plans. It is not a positively prepared or justified Local Plan.

2.4 Spatial Strategy - Policy SS2: Settlement Hierarchy

- 2.4.1 To ensure its effectiveness, the emerging CLLP should provide a logical hierarchy which allows for a suitable and sustainable distribution of sites and development across the plan area. Based on our assessment of the Authorities’ evidence base, we are concerned that the proposed settlement hierarchy set out at Policy SS2 has been driven by a supply-led approach which considers the availability of sites, rather than an evidence based approach strategy for sustainable growth which attempts to accommodate growth in the locations where such need is arising.
- 2.4.2 To this effect, the ‘Site Selection Process’ Note (Ref: H016) which outlines the housing and employment site selection process undertaken as part of the Central Lancashire Strategic Housing and Economic Land Availability Assessment (“SHELAA”) states that: *“Allocations were decided taking into account the findings of the Stage 2 assessment of sites and the proposed spatial strategy and settlement hierarchy.” [Our emphasis].*
- 2.4.3 The Central Lancashire Authorities have not provided any robust evidence to demonstrate how the spatial strategy or settlement hierarchy has guided the allocation of sites. Our review of the CLLP evidence base suggests that the entire site selection process for the CLLP is undertaken within the SHELAA itself; this document identifies which of the assessed sites will be allocated.
- 2.4.4 The Site Selection Process Note states that: *“The Central Lancashire Authorities have drawn on information in the SHELAA to identify a sufficient supply and mix of specific deliverable and developable sites to meet the area’s identified housing and employment land requirements.”*

- The Note explains that a two stage process has been undertaken to identify and assess potential sites within the SHELAA:
- 2.4.5 Stage 1a involved the identification of sites with potential for development and then at Stage 1b, an 'initial survey' of the potential sites were undertaken to assess whether development would be affected by constraints (including, inter alia, Flood Zone 3b, high risk of surface water flooding and Sites of Special Scientific Interest) in order to ascertain whether the sites were deemed 'unsuitable for development'. At Stage 1, sites located within the Green Belt (with the exception of previously developed sites in the Green Belt) were 'parked' until a review of land outside of the Green Belt had been undertaken and it had been established if there was sufficient land available outside the Green Belt to meet the identified housing and employment needs.
 - 2.4.6 The Site Selection Process Note explains that all sites taken forward to Stage 2 were subject to a more detailed assessment to determine if they are suitable, available, and achievable, taking account of, inter alia, the Strategic Flood Risk Assessment, Integrated Assessment and Habitats Regulations Assessment.
 - 2.4.7 It is apparent that upon review of the schedule of discounted sites set out at SHELAA Appendices 1-4, that the 'reasons for discounting' go beyond a review of constraints, and instead a 'policy on' approach which makes references to the spatial strategy is included. For instance, for a number of assessed SHELAA sites, including SHELAA Refs: 19P007 and 19P008, the reason for discounting is "*Site does not accord with Spatial Strategy - site within AoS [Area of Separation] and OC [Open Countryside]*". The SHELAA does not explain how or why the spatial strategy and settlement hierarchy has been assessed nor does it provide a method for comparison for assessed sites in order to determine which sites should be taken forward for allocation.
 - 2.4.8 Notwithstanding that the SHELAA contains varying degrees of information about each Site, the SHELAA then appears to determine whether the Sites are allocated (or not) on a completely subjective basis. There is no robust methodology presented as to how Sites were scored in terms of constraints or what weighting (if any) has been given to the Site's position in the settlement hierarchy. For example, SHELAA Ref: 19C274x, 19C127 (Site Profile 34 - Land to the east of New Street, Mawdesley, Chorley) is identified as an allocation in a Tier 5 settlement - which is acknowledged to suffer from "a very limited range of services and facilities" - despite being rated 'red' against five out of seven metrics of the RAG assessment contained within the Stage 0 Transport Assessment, whilst SHELAA Ref: 19C241x, 19C124 (Site Proforma 11 - Crosse Hall Lane, Chorley) which is located on the eastern edge of the Chorley Key Service Centre (Tier 2) has not been identified for allocation due to highways access issues, despite being rated 'red' against one of the seven Stage 0 Transport Assessment metrics.
 - 2.4.9 As such, we have significant concerns over the lack of consistency and robustness to the approach for assessing Sites in the SHELAA. It is simply not clear how the evidence base has been used to conclude whether sites should be carried forward as an allocation within the emerging CLLP. The SHELAA fails to provide a basis for comparison or logical selection of (or discount of sites) and cannot be considered to be justified. Indeed, the Integrated Assessment which has been produced in support of the current Regulation 19 consultation also fails to provide a methodology as to how a conclusion has been reached in terms of which sites should be carried forward as allocations; it provides a matrix of positive, neutral or negative impacts in relation to a number of assessment criteria but no method of comparison of sites.
 - 2.4.10 Based on our review, it does not appear that the selection of allocations has been driven by either a spatial strategy or the settlement hierarchy; and if it has been, the process behind that selection is completely opaque. The distribution of development across the settlement hierarchy

appears to be a result of the quantum of Sites which were favoured by the SHELAA which, in turn, appears to have been determined on an ad hoc basis. From our review of evidence, it is not possible for a reader of the CLLP to determine why its Site may have been favoured or dismissed as an allocation in comparison to alternative Sites.

- 2.4.11 As such, we have fundamental concerns that the site selection process which has been pursued by the Central Lancashire Authorities fails to justify how the identified settlement hierarchy will be achieved in practice, and therefore we object to draft Policy SS2. Balanced Housing Market

3 Balanced Housing Market

3.1 Policy HS1 (Strategic Policy): Scale of Housing Growth and Distribution of Housing Requirements

Plan Period

- 3.1.1 Draft Policy HS1 establishes the requirement for 23,652 homes to be delivered across the plan area during the 2023 and 2041 plan period. NPPF paragraph 22 makes it clear that strategic policies should “*look ahead over a minimum 15-year period from adoption*”.
- 3.1.2 The timetable for the preparation of the Local Plan contained within the Local Development Scheme approved for each of the Central Lancashire Authorities in Spring 2024 expects that the CLLP examination stage will last between six to twelve months from submission of the Plan, with adoption of the plan expected by 31st December 2026.
- 3.1.3 Notwithstanding concerns that we have in respect to the underestimated length of the examination, even if the CLLP is adopted by 31st December 2026, given that the end date of the strategic policies relating to housing and employment land supply is 31 March 2041, the plan will not cover a full 15-year period post adoption. As such it is not considered that the emerging plan period is accordance with national policy. In order to be considered sound, the plan period should therefore be extended to 2042 as a minimum.
- 3.1.4 Such extension to the plan period will necessitate an increase to the overall housing requirement set out at emerging Policy HS1 to at least 24,944 homes based on the currently proposed 1,314 dpa being pursued, or 31,597 homes (1,663 dpa x 19 years) based on the latest affordability data (discussed further below).

Scale of Housing Growth

- 3.1.5 Draft Policy HS1 set out the following distribution of the housing requirement across the three authorities: 6,012 homes in Chorley (334 dwellings per annum (“dpa”)), 9,360 homes in Preston (520 dpa) and 8,280 homes in South Ribble (460 dpa). The emerging plan requirement therefore equates to an annual average of 1,314 dpa.
- 3.1.6 Based on our review of the ‘Approach to meeting Housing Need’ Topic Paper (Ref: TP1) which has been produced in support of the emerging CLLP, we understand that the overall housing requirement is derived from the Central Lancashire Housing Study, which has been prepared by DLP Planning and updated in December 2024, in support of the current Regulation 19 consultation.
- 3.1.7 The Housing Study Update recommends the application of an ‘Employment-led (CR 1-to-1) scenario’ which would result in a housing requirement of 1,237 dpa; an uplift from the 2023 standard method Local Housing Heed (“LHN”) baseline scenario of 944 dpa.
- 3.1.8 The Housing Study Update draws heavily on employment forecasts from Cambridge Econometrics in reaching its preferred option. As explained within the accompanying Central Lancashire Housing Needs assessment, Stantec’s Development Economics experts consider this to be a very pessimistic view of growth, as demonstrated by comparison with forecasts for the same period from Oxford Economics, which show growth of nearly 10,000 more jobs across Central Lancashire between 2023 and 2041. Notwithstanding this, both sets of forecasts are trend-based, and so not include major planned projects – for example the establishment of the National Cyber Force (“NCF”) headquarters in Samlesbury.

- 3.1.9 Lancashire Combined County Authority (“LCCA”) has recently consulted on a draft Growth Plan which confirms its view that ‘*the location of the National Cyber Force provides opportunity to harness new corporates, SMEs and talent into the region*’¹. Indeed, the Government has also articulated the role it sees its investment in the NCF as supporting these sectors to grow, stating that:

“Within the next few years NCF will establish its centre of gravity in the north west of England. It will contribute to driving growth in the technology, digital and defence sectors, and encourage the creation of partnerships between government, industry and universities in the region. This growth will allow us to enhance and broaden our collective skillset, deepening existing partnerships and forging new ones, strengthening the UK’s cyber ecosystem”².

- 3.1.10 Work undertaken by Plexal on behalf of Lancashire County Council (“LCC”) suggests that the NCF will accommodate in the order of 2,000 direct jobs but will potentially generate a further 1,120 indirect jobs. This would suggest a total of 3,120 additional jobs within Central Lancashire being generated by the NCF.
- 3.1.11 Through the creation of new jobs and attraction of investment, the NCF will stimulate additional needs for infrastructure, including the provision of housing to accommodate a growing labour-force. The profile of employment opportunities generated can be expected to have an impact on the local housing market, creating additional demand for a range of types and tenures within Central Lancashire.
- 3.1.12 For the purposes of comparison (a point we come back to later) it is worthy of note that both the 2023 standard method LHN requirement, and the uplifted employment-led need figure set out within the Housing Study Update is significantly lower than the requirement based on the Standard Method LHN published by the Government 12 December 2024³. The new standard method for Central Lancashire is 1,643 dpa; comprising 564 dpa in Chorley, 590 dpa in Preston and 489 dpa in South Ribble.
- 3.1.13 Based on a review of the dwelling completion rates in Central Lancashire since 2013, as set out at Table 3 of the Housing Study Update, which is extracted below for ease of reference, the Central Lancashire Authorities have exceeded the proposed 1,314 dpa requirement set out at draft Policy HS1 in nine out of eleven of the past monitoring years. Indeed the average delivery across the plan area over the past five monitoring years is 2,032 dpa.

¹ Lancashire Combined County Authority (February 2025) The Lancashire Growth Plan 2025 – 2035, consultation version, p36

²

https://assets.publishing.service.gov.uk/media/61b9f526d3bf7f05522e302e/Force_Explainer_20211213_FINAL_1_.pdf

³ <https://assets.publishing.service.gov.uk/media/675aaeca9f669f2e28ce2b91/lhn-outcome-of-the-new-method.ods>

Table 3 Dwelling completion rates in Central Lancashire 2013-2024

Authority	2013 / 2014	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019	2019 / 2020	2020 / 2021	2021 / 2022	2022 / 2023	2023 / 2024
Preston	142	488	282	791	634	785	828	828	1,064	1,405	1,630
South Ribble	346	486	371	237	312	437	412	424	513	701	580
Chorley	582	723	597	517	661	573	640	306	228	309	291
Central Lancashire Total	1,070	1,697	1,250	1,545	1,607	1,795	1,880	1,558	1,805	2,415	2,501

Source: Council Authority Monitoring Reports NB: Single figure reported for 2019-2021, therefore 2019/2020 and 2020/2021 figures for Preston are averaged across the two years.

- 3.1.14 Given the clear direction provided by the Government on the imperative to boost the delivery of housebuilding (including a significant uplift in the housing needs for Central Lancashire), it is perverse that the Central Lancashire Authorities should plan to deliver a quantum of homes that is significantly below recent delivery rates in the area.
- 3.1.15 As shown on the extract below, Table 4 of the 'Approach to meeting Housing Need' Topic Paper sets out how the proposed employment led uplift to the 2023 standard method figure has been distributed between the three Authorities and then how an uplift to that scenario has been added to each Authority to meet minimum figure required by the NPPF2024, in order to benefit from the transitional arrangements for Regulation 19 plans set out a paragraph 234a.

Table 4: Redistribution of need to meet the Transitional Arrangements

	Proposed redistributed housing need based on Central Lancashire Housing Study requirement	Increase applied to meet transitional arrangements following introduction of new Standard method	New Proposed redistributed housing need	New Standard Method standalone requirement
South Ribble	450	10	460	489
Preston	500	20	520	590
Chorley	287	47	334	564
Total	1,237	77	1,314	1,643

- 3.1.16 The approach outlined in the Housing Study Update is fundamentally flawed for a number of reasons as we set out below.
- 3.1.17 The 'Approach to meeting Housing Need' Topic Paper, sets out that the Central Lancashire Authorities seek to apply an uplift of 77 dpa to the 1,237 dpa requirement identified within the Housing Study Update. The purpose of the uplift is to increase the total housing requirement to the 1,314 dpa figure set out within Policy HS1 and to ensure the emerging CLLP meets 80 per cent of the December 2024 standard method LHN requirement (of 1,643 dwellings).
- 3.1.18 The Housing Topic Paper makes clear that this adjustment is made only as a measure to meet the minimum requirement to reach 80 per cent of the December 2024 standard method LHN figure. This approach is contrived to benefit from a transitional arrangement and is evidently not evidence based and not justified in a plan making sense. If the approach to calculating the housing requirement is based on the Housing Study Update evidence provided by the

Authorities (which is what the NPPF2023 requires) then housing requirement for the CLLP would be 1,237 and transitional arrangements within the NPPF2024 would not apply. On that basis, we consider that the current Regulation 19 version of the CLLP should be withdrawn, and a Plan should be prepared in accordance with the NPPF2024.

- 3.1.19 Notwithstanding the above conclusion, even if an uplift to meet the transitional arrangements is applied, it is not clear at all how or why that uplift has been distributed to the constituent authorities in the manner proposed. The approach taken (if accepted in principle) is not justified.
- 3.1.20 It is worth noting that since the Government published the 'Indicative Local Housing Need' spreadsheet based on the revised standard method in December 2024, the latest affordability ratios – a key component of the calculation of LHN – have been published by the ONS. Based on the latest March 2024 affordability data (published March 2025), we calculate that the latest LHN requirement for Central Lancashire totals 1,663 dpa, comprising 616 dpa in Preston, 492 dpa in South Ribble and 554 dpa in Chorley. This represents an increase of 19 dpa against the equivalent LHN requirement published in December 2024, and is 426 dpa (34 per cent) greater than the base requirement identified within the Housing Study Update.
- 3.1.21 Further to the above, if the CLLP is to be examined under the December 2023 version of the NPPF it must meet the transitional arrangements set out at paragraph 243 (a) within the December 2024 version of the NPPF. Footnote 83 of the NPPF states that housing requirement (on which the 80 per cent should be measured) should be calculated using the standard method in national planning practice guidance, published on 12 December 2024. The PPG requires the LHN requirement is updated using regular evidence and for Central Lancashire the current LHN totals 1,663 dpa. As such, the proposed housing requirement set out at draft Policy HS1, amounts to 79.1 per cent of the area's latest standard method requirement; not the required 80% and, as above, should be withdrawn.

Redistribution of Housing Requirement

- 3.1.22 Notwithstanding our objections to the 'transitional uplift' applied above, the initial redistribution of the housing requirement (before the uplift is applied) is equally flawed.
- 3.1.23 Table 4 above sets out that the redistribution of the housing land is based on the Central Lancashire Housing Study; this is not the case. The rationale for the re-distribution of housing need is set out within the Housing Topic Paper and is very briefly summarised within the Site Selection Process note.
- 3.1.24 Both of those documents seek to set out that the re-distribution of the overall housing requirement has been based on meeting the spatial strategy set out within the plan, including the settlement hierarchy. This includes '*promoting growth in the most sustainable locations*' with a focus on city and town centre regeneration and the reuse of brownfield land with development more restricted outside of settlement boundaries, in areas of Green Belt and open countryside and other areas of protection. The Housing Topic Paper goes on to state that:

"These factors have been considered when looking at how housing need can and should be delivered across Central Lancashire and if any constituent need should be redistributed to ensure allocations for housing conform to this approach.

A key factor in this work has been the delivery of City Deal in Preston and South Ribble. Delivery of sites in these areas was delayed in the existing Local Plans due to the delivery of much needed infrastructure to unlock these sites coming forward later than envisaged. This has meant there is still considerable delivery of sites identified in the extant plans as part of City deal and as such this plan reflects that requirement in distributing need.

An overall redistribution of need has been identified as appropriate to ensure delivery of new sites conform with the spatial strategy and to enable existing commitments to come forward. This has resulted in the following redistribution as shown in Table 3.”

Table 3: Redistributed Housing need (DPA)

Chorley	Preston	South Ribble	Total
287	500	450	1,237

- 3.1.25 As explained in Section 2 of our representation, we do not consider that the approach to the settlement hierarchy has been adequately justified, and instead been dictated by an inconsistent approach undertaken within the SHELAA which discounted Green Belt sites from the outset which was, in turn, based on the housing requirement of Chorley already having been redistributed.
- 3.1.26 The housing paper provides no evidence to justify the numerical re-distribution of need as per Table 3 extract above. There is no calculation as to how those figures have been reached or assessment of how the reapportioned requirement will impact on meeting specific housing needs in each of the Boroughs. As set out earlier in these representations, we consider that the re-distribution set out above is not evidence-based but solely the output of the supply of sites output from the SHELAA which, in itself is flawed
- 3.1.27 We consider that the rationale set out within the Housing Topic Paper for the re-distribution of development is not robust.. The key principle on which the requirement has been redistributed is to locate housing in the most sustainable locations. However, as set out in detail below, the re-distribution of the housing requirement fundamentally relocates development away from where that need is generated. The most prominent example being Chorley which has the highest level of need identified in the 2023 standard method, but the lowest level of housing development proposed (and vice versa for Preston).
- 3.1.28 As summarised in the table below, the emerging CLLP proposes to distribute just 334 dpa to Chorley. This distribution figure is some 172 dpa lower than the 506 dpa LHN requirement set out under the 2023 Standard Method and 230 dpa lower than the 2024 Standard Method requirement based on the March 2024 affordability data.

	Proposed housing distribution within Draft Policy HS1 (dpa)	2023 Standard Method LHN Requirement (dpa)	2024 Standard Method LHN Requirement (dpa)	Difference between the proposed Draft Policy HS1 distribution and the 2024 LHN Requirement
South Ribble	460	169	489	29 units (5.9% shortfall)
Preston	520	269	590	70 units (11.9% shortfall)
Chorley	334	506	564	230 units (40% shortfall)
Total	1,314	944	1,643	329 units (25% shortfall)

- 3.1.29 The emerging Local Plan proposes housing requirements which are below the standard method LHN for all three authorities. Overall across the plan area, there is a 25 per cent shortfall against the latest LHN requirement. The most drastic reduction is in Chorley where just 60 per cent of the latest LHN requirement is proposed to be met. This distribution is likely to pose challenges for the achievement of sufficient housing delivery, particularly affordable and/or specialist, in Chorley.
- 3.1.30 We are concerned that by not meeting needs which are arising in a particular area, there will be negative implications in terms of providing adequate housing choice to address the area's needs and affordability. There will also be implications for affordable housing allocations. Notwithstanding concerns that we have raised about how the settlement hierarchy has been formulated, we note that the emerging settlement hierarchy set out at draft Policy SS2, proposes Preston Urban Area as a primary focus for growth in Central Lancashire. Such approach to distribution will not provide the appropriate mix of housing that will fully address the area's housing needs. For instance, family housing needs which are arising in suburban areas of Chorley cannot be adequately accommodated by regeneration initiatives Preston City Centre which are predicated on the development of dense, flatted accommodation.
- 3.1.31 Whilst brownfield led regeneration should be supported, the aspiration to regenerate Preston should not be at the expense of meeting the area's development needs in full, in particular the needs arising in Chorley. In order to be positively prepared, it is vital that each constituent authority should at least meet its own and latest standard method LHN (2024) requirements. To do this, it is important that a strategy is put in place which provides a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period.
- 3.1.32 In addition, and to compound the above issue, our Housing Supply Report prepared for the Consortium in conjuncture with a Viability Study provided by Roger Hannah for the consortium

shows that the Council’s expected delivery in Preston is drastically overstated with significant viability issues being identified for the delivery of City Centre sites in Preston. In summary, the CLLP proposes to strip away the housing requirement from the area where it is most needed and relocated it to an area where development is not deliverable.

3.1.33 The above process is flawed if we only have consideration for the housing needs from the 2023 standard method LHN calculations which are primarily based on demographic and affordability considerations.

3.1.34 However, the proposed housing requirement within the CLLP (before the transitional uplift is applied) is based on an Employment-Led Housing Needs Scenario to uplift the standard method LHN derived figure of 944 dpa to 1,237 dpa. The detail of how that uplift has been arrived at is set out within the Housing Needs Study and summarised in the table below:

Employment-Led Housing Need Scenario Summary

Area	Change 2023 - 2041				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Employment
Central Lancashire	33,088	8.6%	22,622	14.0%	1,978	1,237	894
Chorley	11,638	9.7%	7,229	14.2%	952	410	305
Preston	10,521	6.9%	8,423	13.7%	235	441	295
South Ribble	10,930	9.7%	6,970	14.1%	791	386	295

3.1.35 The economic-led housing need scenario, as set out above, is based upon meeting economic needs (factoring in population and household change as well as migration) and is predicated by the assumed provision of a balanced distribution of housing delivery across the CLLP area, with 410 dpa in Chorley, 441 dpa in Preston and 386 dpa in South Ribble.

3.1.36 Critically, the economic-led housing need scenario fails to take account of the A59 ‘Growth Corridor’ stretching from Blackpool to Blackburn, via Preston and taking in Samlesbury Enterprise Zone, nor the future delivery of the NCF Campus at Samlesbury, which is set so provide significant levels of new, highly skilled employment in the area. Instead, only limited consideration of NCF Campus and the associated implications for housing development are set out withing the emerging CLLP. The CLLP has equally overlooked the need to support that economic growth with developments specifically proposed to supply the labour force required to support it; for example proposals for Cuerdale Garden Village which are subject of additional representations by our Client.

3.1.37 It is clear from the above that in order for Central Lancashire’s economic growth needs to be met that development should come forward in the areas where the needs for such development are arising and best supports economic led growth. The proposed distribution of housing proposed by draft Policy HS1 does not do that.

3.1.38 The CLLP should provide for a wide range of deliverable and developable sites across the plan area in order to provide competition and choice to ensure that housing needs are met in full. As currently drafted, we are concerned that that the plan does not allow for an appropriate balance of development in a way that ensures the area’s full housing needs are met. s.

3.1.39 More fundamentally, and as demonstrated above, in terms of providing a plan which is positively prepared and justified, the Authorities’ approach to re-distribution of housing simply doesn’t reflect (and is not supported by) the evidence that it has provided to seek to justify the plan. The

housing requirement is neither reflective of the demographic and affordability based calculations within the 2023 standard method, nor does it reflect the rationale behind the 'Economic Led Housing Need' uplift and the further uplift to meet the 'transitional arrangements' of the NPPF is completely unjustified. As such we object to draft Policy HS1 as currently drafted.

- 3.1.40 Notwithstanding each of the objections set out above, as a wider point we consider that the CLLP has gone out of its way to try and meet the transitional requirements of the NPPF2024 and has not taken the very real and transformative opportunity to prepare an aspirational plan which is the clearly intended direction of the current Government's planning policy.
- 3.1.41 It is noteworthy that not only is the emerging CLLP Policy HS1 housing requirement of 1,314 dpa substantially less than the area's latest standard method LHN requirement, but the proposed housing requirement is lower than the 1,334 dpa requirement set out within the Part 1 Preferred Options (Regulation 18) document which was consulted on by the Central Lancashire Authorities between December 2022 and February 2023. That previous plan included for Green Belt release including the redevelopment of brownfield sites within the Green Belt which would fit the Council's claimed spatial strategy aims.
- 3.1.42 There has been a reduction to the overall aspiration of the plan at the same time as the local housing needs for the area increasing; our Client views this as a negative, backward step and one which is not positively prepared or justified.
- 3.1.43 Stantec has undertaken a forensic analysis of housing need across Central Lancashire, on behalf of a consortium of developers and housebuilders, including Story Homes. The need assessment – which forms part of our submission to the current Regulation 19 consultation – demonstrates that there are clear reasons as to why the Central Lancashire Authorities should pursue a housing requirement in excess of that which is currently proposed within draft Policy HS1. The transitional arrangements set out within the latest version of the NPPF should not be used as a tool to constrain the housing requirement set out within the emerging CLLP, in a way that does not address the area's full housing needs.
- 3.1.44 We therefore object to the overall level of housing proposed across the plan area and are of the firm view that the emerging housing requirement should be increased. We strongly encourage the Central Lancashire Authorities to be more aspirational within the CLLP, by planning to meet the current standard method requirement of 1,643 dwellings, thereby ensuring that the area's housing and economic need are needs are met in full, in a way that is in accordance with the vision and stated objectives of the CLLP. Such an approach would be consistent with the NPPF requirements for the plan to be 'positively prepared'.
- 3.1.45 It is firmly our view that the CLLP is fundamentally flawed in its approach and should be withdrawn and a joint Local Plan prepared which seeks to meet the full housing requirement identified by the 2024 standard method. At the very least, it is our view that the Local Plan should be paused to re-visit the housing requirement and its distribution across the Authorities and the exceptional circumstances which justify a review of the Green Belt to identify both sites for immediate delivery and for the safeguarding of land to meet future needs across the plan area.
- 3.1.46 With regard to the above, we consider that as a very minimum the draft Local Plan, if progressed to submission, should include safeguarded land (removed from the Green Belt) identified for early release by the CLLP in the event that the Plan doesn't deliver against its trajectory. The release of safeguarded land will be necessary to help bridge the gap between the emerging Local Plan which we know does not meet current and future Local Plan needs. Story Homes is of the view that Green Belt release will inevitably be required to ensure a supply of well-balanced sites and robustly meet demand

3.2 Policy HS6: Housing Mix and Density

Housing Mix

- 3.2.1 Draft CLLP Policy SH6, part 1a requires that all housing developments of 10 or more dwellings, or on sites of 0.4 hectares or greater, provide a mix of dwelling types and sizes to address the needs for that location as identified in the ‘Housing Need and Demand Assessments’ (“HNDA”).
- 3.2.2 We support the premise that housing development should respond to housing needs in principle to ensure housing ‘needs’ are met but must also have regard to demand for housing. The policy as drafted provides for too rigid an approach with the ‘need’ for dwellings being tied to the HNDA which provides only a snapshot in time and is based primarily on historic trends and existing housing stock.
- 3.2.3 The 2024 HNDAs produced by Arc4 for each of the Central Lancashire Authorities, explains that dwelling mix analysis is underpinned by a demographic scenario model (as well as existing housing stock) which takes account of projected household change using 2018-based ONS household projections. Whilst acknowledging that the 2018-based projections are the most recently available ONS data, such projections are derived from a pre-Covid environment; since which time there have been significant changes in work-place trends in favour of home working. Such working patterns has resulted increased demand for larger properties, to accommodate home-office space. The general feedback from agents and developers supports that there is an increasing demand for larger house types, with a clear need for more 4+ bedroom housing in this location compared to the mix set out within the HDNAs.
- 3.2.4 Whilst we note that dwelling type and mix requirements set out with the HNDAs is said to be “*presented as a broad range which also considers household aspirations and expectations*”, to support flexibility, we strongly encourage flexibility in the wording of this policy to ensure the delivery of a housing mix which is aligned to market factors.
- 3.2.5 Our Client – as well as other local developers – who have operated within Central Lancashire for decades have assembled an exceptional knowledge of the need and demand within the area. We therefore consider that the market is best placed to offer a mix of dwelling types and sizes to address the needs for that location. Need and demand fluctuates over time in a way that it is often not able to be reflected within a point-in-time assessment carried out as part of HDNA studies. There may also be variations in mix depending on the type of site and its location (e.g. a higher density town centre scheme will be more suited to delivering a smaller mix of property sizes and a suburban lower density scheme a larger mix of family housing). As such, we strongly encourage a flexible approach to be applied when assessing housing mix, in a way that is reflective of the most up-to-date needs of the housing market and makes allowance for our Client to provide alternative housing mixes, as evidenced by the market. The policy should also recognise that local character should be a consideration when establishing an appropriate housing mix. Therefore, we propose that the wording of Draft Policy HS6 part 1a is amended as follows:
- “Provide a mix of dwelling types and sizes **which reflects local character and to addresses** the needs for that location as identified in the Housing Need and Demand Assessments, **or other up-to-date local evidence**”*
- 3.2.6 Draft Policy HS6, part 1b requires all dwellings to be built to M4(2) accessible and adaptable standard and part 1c requires at least 4 per cent of affordable dwellings on sites in Preston and Chorley, and at least 5 per cent of affordable dwellings on sites in South Ribble to be constructed to M4(3) wheelchair accessible standard.

- 3.2.7 Footnote 51 of the NPPF2023 states that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. The principle of including for such optional standards is therefore supported but the required level of requirement must reflect the level of need established by the evidence available.
- 3.2.8 We consider that the case for M4(2) and M4(3) homes has been overstated within the evidence base and therefore within Policy HS6. The HNDA for each Borough sets out how the percentage of M4(3) units has been calculated.
- 3.2.9 In relation to Chorley, Table 4.16 of the HNDA outlines the number of wheelchair users recorded from a number of sources of data and then extrapolates that rate across the expected delivery of new homes within the Borough to arrive at a range of figures (expressed as percentages) as to how many wheelchair using households are likely to require accommodation within the new supply of housing. An average figure from all those sources is then taken. An extract from the Chorley Table 4.16 is included below:

Assumption	% requirement	Number each year (based on 428 annual housing need)
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair all the time	0.6%	3
Wheelchair use from the English Housing Survey 2018/19 – households using wheelchair either indoors or outdoors	3.0%	13
Chorley Borough has 545 current users of wheelchairs inside and outside the home based on 2021 household survey. This equates to 1.1% of households.	1.1%	5
Chorley Borough 1,147 need over plan period (divided by 15 years) assuming all met through newbuild based on 2021 household survey	17.8%	76
Aspire report on wheelchair accessible housing (*)	10.0%	54
Average of indicators	6.5%	28

(*) Wheelchair Accessible Housing: Waiting for appropriate housing in England, Aspire October 2014 recommends that the national government should set a minimum requirement of 10% of all new build properties across all tenures to be wheelchair accessible.

- 3.2.10 The third row of the table above appears to be the only figure which is representative of the amount of wheelchair users within Chorley at the moment. The first two rows appear to take figures from England as a whole. Even if we take an average of all wheelchair users between the 2018/19 (English Housing Survey) and 2021 (Chorley Survey) this would give an average of 2.3% households requiring a wheelchair.
- 3.2.11 It is not clear how the 17.8% within the fourth row of Table 4.16 has been derived. The gross amount of wheelchair users appears to be displayed as a ‘need’ which is then calculated annually, but it is not clear what calculation sits behind the ‘need’ or what that need is 17.8% of. We’d suggest that figure is removed from the calculation.
- 3.2.12 The fifth row identifies a requirement for 10% of homes to be provided as M4(3) homes. However, this appears to be taken as a recommendation of a nationally produced report which

does not appear to have been submitted with this CLLP consultation. The recommendation doesn't appear to include an assessment of need within Chorley and should be discounted.

- 3.2.13 With regard to the above, we'd suggest that the actual need for homes to be provided to M4(3) standard is much more likely to be circa 2% in line with Chorley's actual rate of wheelchair users as a percentage of the population; such that the requirement for 4% M4(3) compliance is likely to be onerous.
- 3.2.14 We do not repeat this exercise for Preston and South Ribble in detail. However, in Preston, if the Aspire Housing Report is discounted from the HNDA calculation (Table 4.16) Preston has an average wheelchair user rate of circa 3.6%. South Ribble has in the region of 4.6% of households using a wheelchair. Accordingly, Policy 1(c) appears to be reasonable.
- 3.2.15 At Part 1(b) the Policy seeks to apply M4(2) across all new dwellings. The HDNA appears to lack any detailed analysis of household requirement which justifies the blanket application of this optional standard; beyond there being a generally aging population. Clearly, the whole population of the UK is aging but that has not resulted in Part M4(2) of the Building Regulations being mandatory. We do not consider that there is sufficient evidence to justify such a policy approach and this element of the Policy should be deleted as follows:

~~b) Build all dwellings to M4(2) accessible and adaptable standard; and~~

Housing Density

- 3.2.16 Policy HS6 goes on to specify minimum gross housing densities for all new development, ranging from 86 dwellings per hectare ('dph') in Preston City Centre to 21 dph in locations outside off settlement boundaries. Whilst we support the identification of minimum housing densities and the flexibility that is provided as to when lower densities will be permitted, it is essential that the focus on higher density development in Preston City Centre does not preclude the delivery of much-needed homes in sustainable locations, where such need is arising, across the entirety of the plan area.
- 3.2.17 Whilst recognising that paragraph 130 of the NPPF states that Local Plans should use minimum density standards for city and town centres and other locations that are well served by public transport, we are concerned that the Central Lancashire Authorities are proposing to use the CLLP as a tool to redistribute Chorley's housing needs to city and town centre locations, in an effort to reduce the number of sites that it needs to allocate, in the areas where such demand is arising – notably in Chorley.
- 3.2.18 We recommend that the Council should amend its proposed minimum density standards to a level which is not at the expense of good design and that will lead to over-development and urban intensification. High-density development is undesirable as part of family housing schemes, especially when other requirement such as public open space, on-site biodiversity net gain and flood compensation are taken account of.
- 3.2.19 Such amendment is likely to necessitate the need for the Central Lancashire Authorities to identify additional sites which can be delivered across the plan area.

3.3 Policy HS7: Affordable Housing

- 3.3.1 Draft Policy HS7 requires that all major development or sites of 0.5 hectares or more in size, deliver a minimum of 30 per cent affordable provision on sites in Tiers 1, 2 and 3 of the settlement hierarchy and a minimum of 35 per cent affordable on sites in all other locations.

- 3.3.2 Whilst the supporting text makes reference to the HNDA reports prepared for each of the Central Lancashire Authorities being used as the basis of the proposed affordable housing requirements set out in draft Policy HS7, it is unclear as to how the needs specified within the HDNA have been translated into the affordable needs being met via a settlement hierarchy-based approach. As such, we do not consider that this emerging policy is effective or justified.
- 3.3.3 Within Stantec's Central Lancashire Housing Needs report, which accompanies this representation, we have raised concerns in respect to the HNDA methodology. Whilst the HNDA estimates that the net annual affordable need is 831 homes, Stantec's adjustments increase this to 1,364 homes to take account of existing households falling into need, affordable dwelling vacated and affordable stock losses.
- 3.3.4 Notwithstanding these concerns, the Chorley HNDA identifies an annual need for 162 affordable homes, draft Policy HS1 proposes that just 334 dpa in total are planned to be delivered within Chorley. The quantum of affordable housing need identified within the HDNA therefore equates to approximately 50 per cent of the homes which planned to be delivered within the area. This clearly does not align with the draft policy requirement.
- 3.3.5 There is a significant risk that Central Lancashire's affordable housing needs will not be met in full, if the emerging CLLP does not pursue a strategy which is predicated on the meeting the area's full housing needs, as per the latest standard method LHN for each authority. To this effect, by planning to deliver 554 dpa in Chorley, there is a far greater likelihood that the 162 dpa affordable need identified within the HDNA - equating to 29 per cent of the LHN requirement - will be achieved via the minimum affordable requirements set out within draft Policy HS7.
- 3.3.6 Furthermore, we note that significant viability challenges in respect of housing delivery within Preston City Centre are identified within the Main Viability Report which has been produced in support of the emerging CLLP (Ref: CD13). The report finds that: *"all typologies within the lower value zones are unviable, along with all typologies assessed within Preston city centre, where high build costs and site constraints present challenges to viability"*.
- 3.3.7 Notwithstanding that the Central Lancashire Authorities, propose a marginally lower affordable housing requirements in the Preston Urban Area (Tier 1) as a primary focus for growth in Central Lancashire, we question whether the area's full affordable housing needs will be catered for when the policy is predicated on a spatial strategy which directs housing growth to locations where the viable delivery of such homes is challenging.
- 3.3.8 Taking the above into account, our Client firmly believes that additional sites are required to be allocated where the need arises, which is most notably an issue in Chorley, in order for the area's challenging affordable housing needs to be met in full. If additional sites are identified for allocation in the areas where the viability is greater, including areas outside of Preston City Centre, this would ultimately increase the level of affordable housing provided.
- 3.3.9 Draft Policy HS7 goes on to identify specific affordable tenure splits for each constituent authority, unless it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated to not otherwise be financially viable. We support the flexibility provided by such an approach, although we note that whilst 'social rent' and 'affordable rent' percentage splits are provided for within Preston and South Ribble, no affordable rent is earmarked for delivery in Chorley. Again, we question whether the needs of those seeking affordable housing in Chorley are sufficiently catered for though this policy and whether the emerging CLLP is justified in its approach.

3.4 Policy HS11: Self-Build and Custom-Build Housing

- 3.4.1 Our Client supports Draft Policy HS11, insofar as it sets out criteria to enable occupiers to ability to influence the design of self-build and custom-build housing.
- 3.4.2 The Councils have a legal duty to facilitate sufficient quantities of 'serviced plots of land' to meet the demand for self-build and custom-build homes, and as such, we consider that the CLLP should earmark specific sites for the delivery of such housing. Such an approach is considered favourable relative to an alternative strategy whereby, for instance, a percentage of all major development schemes are required to provide a proportion of self-build and custom-build plots. For the avoidance of doubt, it is our Client's view that it is not necessarily appropriate to allocate a plot of land within an allocation to deliver a self build and custom-build housing.

3.5 Policy HS11: Specialist Housing

- 3.5.1 We refer to Stantec's Central Lancashire Housing Needs report, which accompanies this representation, that sets out our evidence in respect of specialist housing for older people. As explained within our assessment, Stantec considers that the approach is fundamentally flawed in that rather than applying any evidence on the provision rate of specialist housing required, it simply 'bakes in' the current rate of provision per head of older population and estimates additional provision that would be required.
- 3.5.2 Stantec estimates requirements using the 'Housing in Later Life' toolkit – a highly-respected means of providing cautious minimum estimates of need – results in a requirement nearly four times higher than set within the Authority evidence – of 7,409 specialist housing units to 2038.
- 3.5.3 As such, we have significant concerns as to whether specialist housing needs across the plan area are sufficiently and whether the emerging CLLP is justified in its approach.

4 High Quality Environment

4.1 Policy EN1 (Strategic Policy): Well Designed Places

- 4.1.1 NPPF paragraph 131 states that “*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*” The NPPF is clear that Plan should set out a clear design vision and expectations to offer as much certainty about design acceptability as possible. It is in this context that Policy EN1 should be assessed.
- 4.1.2 We support the principle of design standards as set out in draft Policy EN1, which are proposed to create high quality and sustainable buildings and places insofar as they accord with national design standards. If, however, the Central Lancashire Authorities seek to introduce requirements which are more onerous than national standards, it is essential that they are robustly justified and underpinned by relevant and up-to-date evidence, as required by the NPPF.
- 4.1.3 Our client objects to the proposal set out within draft Policy EN1 for major residential development schemes to achieve a ‘green light’ against each of the Building for a Healthy Life considerations. This effect, we note that the Building for a Healthy Life guidance document states that “*there may be circumstances where amber lights cannot be avoided due to circumstances beyond the control of the local authority and/or the developer.*”⁴ As such, in order to be justified, the wording of draft Policy EN1 should be amended to better reflect this guidance by removing the requirement for major residential development scheme to achieve ‘green lights’ against all criteria.
- 4.1.4 Importantly, it is critical that the proposed design standards do not jeopardise the delivery of the new homes that the area needs and that local requirements reflects local context and are achievable in practice.

4.2 Policy EN2: Design Criteria for New Development

- 4.2.1 Whilst we support the thrust of draft Policy EN2 which sets out design criteria for new development, we question whether the inclusion of the term “*be climate change resilient*” has been appropriately justified in the context of this proposed policy. As it stands, the reference to climate changes appears to be a somewhat ambiguous term which is not always relevant to the specified design criteria. For example, we query what relevance climate change has to criterion 1d, which requires the incorporation of active frontages to encourage natural surveillance. Likewise, we question the approach of linking climate change resilience with “walking, wheeling and cycling routes” as set out at criterion 1c.
- 4.2.2 We also have concerns with the proposed approach of giving priority to people over vehicles as part of all major development schemes. Notwithstanding the emerging policy requirement for proposals to be designed in line with Manual for Streets (or any successor publications), a holistic-design focused approach should be progressed, which account of a range of design considerations, to ensure the creation of well-designed places, which take account of the needs of all users.
- 4.2.3 For example, there may be instances where existing public rights of way need to be diverted to ensure comprehensive scheme masterplanning in a way that uses land efficiently, thus enabling

⁴ [Building-for-a-Healthy-Life.pdf](#)

better outcomes for pedestrians.. As such, we question how effective this proposed policy approach will be in achieving the desired outcome of ensuring effective and considered design.

- 4.2.4 It is important to ensure that flexibility is applied to design criteria in a way that enables a subjective assessment on a site-by-site basis, which takes account of local context, character and surroundings, such that each development is capable of being assessed on its own merits. Such an approach will also ensure variety in the design of new development across Central Lancashire.

4.3 Policy EN5: Green Infrastructure

- 4.3.1 NPPF Paragraph 188 states that Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. Our Client supports the principle of draft policy EN5 insofar as it seeks to protect and enhance green infrastructure across the plan area, however objects to the requirement for development proposals to “prioritise” the protection, quality, connectivity and multi-functionality of green infrastructure.
- 4.3.2 Green infrastructure is amongst a number of considerations which need to be considered when formulating new development, including inter alia, design, drainage and viability matters. The Central Lancashire Authorities have not provided robust justification as to why it considered that green infrastructure should be “prioritised” ahead of other such considerations. As such, we do not consider that the proposed policy approach is justified.

4.4 Policy EN6: Biodiversity Net Gain

- 4.4.1 We object to draft Policy EN6 on the basis that the proposed CLLP policy wording deviates from the national policy requirement the provision of 10 per cent Biodiversity Net Gain (“BNG”), as set out within Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 4.4.2 As currently worded, draft Policy EN6 requires developments to provide “at least 10%” BNG provision. This proposed wording suggests a quantum that is greater than the mandatory 10 per cent requirement as set out within the Environment Act 2021. We are of the firm view that emerging CLLP should provide certainty, by establishing a fixed 10 per cent BNG requirement which is in accordance with national policy, as per the following suggested wording:

“Developments must deliver the mandatory Biodiversity Net Gain (BNG) requirement of ~~at least~~ 10% unless exempt, as quantified using the latest version of the statutory biodiversity metric.”

- 4.4.3 Noting that the provision of on-site BNG provision is prioritised within national policy, we question the approach to the delivery of off-site BNG as set out within the emerging policy. In particular, we note that the draft policy proposes a sequential order for the provision of BNG delivery which prioritises off-site provision “within the LPA boundary” ahead of off-site provision “within Central Lancashire”. We do not consider that the Central Lancashire Authorities have provided sufficient evidence to justify this sequential approach.
- 4.4.4 Notwithstanding this, in the same way that the Authorities seek to require off-site BNG to be delivered in the same authority in the area in which the proposed development is sited, we consider that the Authorities should seek to prioritise addressing the housing needs of each LPA, in the area in which the need is rising in accordance with the latest standard method LHN requirement, as opposed to re-distributing across the plan area, as is currently proposed by draft CLLP Policy HS1 (please see our observations in respect of this matter at Section 3.1).

4.5 Policy EN10: Development and Flood Risk

- 4.5.1 Draft Policy EN10, part 7 requires that all proposals for new development must take account of the Council's most up-to-date Strategic Flood Risk Assessment ("SFRA") (or the most up-to-date Council flood risk assessment available).
- 4.5.2 Betts Hydro has considered the wording of draft Policy EN10 on behalf of Story Homes. The L2 SFRA Main Report identifies that the SFRA should be kept as a 'live' entity and continually updated when new information becomes available. The EA requests for reports and maps to be published online and be easily updateable – to this end it is disappointing that the recently published SFRA dated February 2025 is reliant upon surface water and fluvial/tidal mapping data that is all now considered out-of-date and that no updates have been made to capture this new information.
- 4.5.3 The L2 SFRA used of fluvial and surface water flood risk baseline information obtained in August 2024. It is considered likely that there will have been an increase in the number at medium/high risk due to the more recent mapping updates, both the surface water updates published in January 2025 and the fluvial/tidal data published in March 2025.
- 4.5.4 As such, in order to be justified, is considered beneficial to for the wording of Draft Policy EN10, part 7 to be amended to take account of acknowledged limitations of the information available, as follows:

*All proposals for new development must take account of the Council's most up-to-date Strategic Flood Risk Assessment (or the most up-to-date Council flood risk assessment available) in combination with any other relevant evidence including that of the Lead Local Flood Authority (Lancashire County Council) and the Environment Agency. **In addition, site-specific surface water modelling information will be considered as part of future planning applications for development.***

4.6 Policy EN14: Environmental Quality

- 4.6.1 We believe that the wording of draft Policy EN14 should be amended for clarity. For instance, as currently worded, criterion 2e states that development shall not: "*result in significant harm to soil quality.*" Notwithstanding questions that we have in respect of the Authorities' definition of "significant harm", and what this means in a practical sense, we are unclear as to what the implications of such a policy are for greenfield residential development. We do not consider that this policy is adequately justified.

4.7 Policy EN15: Areas of Green Belt

- 4.7.1 Draft Policy EN15 seeks add "local detail" to assist with the application of national Green Belt policy set out at Paragraph 154 and 155 of the December 2023 version of the NPPF. Notwithstanding concerns that we have about the rationale of providing "local detail" to national Green Belt policy, we understand that the Central Lancashire Authorities have opted to reference the December 2023 version of the NPPF, because that is the version of the Framework against which they seek the emerging CLLP to be examined against, on the basis of its perceived compliance with the transitional provisions set out at paragraph 234a of the latest December 2024 version of the NPPF. As we have explained in our response to Draft Policy HS1 (at Section 3.1 above) the proposed housing requirement set out within the emerging plan amounts to just 80 per cent of the area's latest standard method requirement, which is not a justified or positively prepared approach to plan making.

- 4.7.2 Having reviewed the evidence based which has been produced in support of the emerging CLLP, we do not consider that the Central Lancashire Authorities have provided sufficient or robust evidence to conclude that no exceptional circumstances exist to justify maintaining the extent of the existing Green Belt, especially given that the emerging Local Plan does not plan to meet the area's development needs in full.
- 4.7.3 Indeed, we note that the CLLP seeks to omit draft Green Belt allocations from its Preferred Options draft of the CLLP, including for instance former Camelot Theme Park and Cuerdale Garden Village, which have been earmarked for release from the Green Belt within the previous iterations of the Plan. We are of the firm view that the exceptional circumstances which clearly existed to justify the review of Green Belt boundaries (and inclusion of Green Belt Allocations) remain extant at this juncture. Indeed, the clear direction provided by the Government on the imperative to address the national housing crisis (including a significant uplift in the housing needs for Central Lancashire) indicates that those circumstances are even more exceptional than assumed in the previous Preferred Options version of the CLLP. With this in mind, the broad approach to no longer pursue Green Belt release is not and cannot be justified by the Central Lancashire Authorities.
- 4.7.4 Furthermore, when defining Green Belt boundaries, NPPF2023 paragraph 148 / NPPF2024 paragraph 149, criteria c) and d) requires that plan making authorities to identify areas of safeguarded land to meet the longer-term needs stretching beyond the plan period, whilst making clear that the safeguarded land is not allocated for development at the present time.
- 4.7.5 In the case of Central Lancashire, the need for safeguarded land was discussed within the Regulation 18 Preferred Options consultation document. Page 33 of the previous consultation document acknowledged the role that safeguarded land has played in identifying land beyond 2015, particularly in Chorley and South Ribble. We are therefore very surprised that the role of safeguarded land is not considered within the Regulation 19 document and are unclear as to why Borough Local Plan policies relating to safeguarded land (ie. Chorley Local Plan Policy BNE3 and South Ribble Local Plan Policy G3) are deemed "no longer relevant" within the proposed schedule of superseded policies. The Central Lancashire Authorities have not provided any justification as to why it is not seeking to identify safeguarded land within the current iteration of the CLLP; we do not consider this to be a positively prepared approach to addressing the area's longer term development needs.
- 4.7.6 Even if the emerging CLLP is to be examined under the provisions of the December 2023 version of the NPPF, the latest version of the NPPF remains a material consideration for the purposes of decision taking, and as such should be given appropriate regard. As such, we propose that the policy wording is updated to reflect NPPF 2024. The Central Lancashire Authorities will be cognisant of the introduction of 'grey belt' within the December 2024 version of the NPPF; this represents a significant shift in national Green Belt policy. Sites within the Green Belt comprising previously developed land and any other parcels and/or areas that make a limited contribution to the Green Belt, but excluding areas or assets of particular importance could constitute 'grey belt', the development of which should not be regarded as inappropriate, subject to specific criteria being met.
- 4.7.7 It is essential that planning decisions take account of this important material planning consideration, and such if the Council is to include a policy which seeks to add "local detail" to national Green Belt policies, it should reflect the Government's latest planning policies and guidance in relation to the Green Belt in order to be effective.

4.8 Policy EN17: Development in the Open Countryside

- 4.8.1 Draft Policy EN17 set out exceptions as to when development proposals in the open countryside, outside the settlement boundaries and 'Areas of Separation' will be acceptable. These include, inter alia, the development of rural housing exception initiatives, and rural workers dwellings.
- 4.8.2 In order to ensure compliance with national policy, it is critical to recognise the relationship with this draft policy with policies which relate to the supply of housing.
- 4.8.3 As noted above, the December 2024 version of the NPPF remains a material consideration for the purposes of decision taking. Footnote 8 attached to the 'presumption in favour of sustainable development' sets out at paragraph 11 that for decision-taking, policies may be considered out-of-date for applications involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.
- 4.8.4 Draft Policy EN17 has implications for the supply of housing, and we consider that the policy should be amended as follows, to acknowledge the fact that the development restrictions proposed by the policy will not apply in the event that the relevant Authority in which planning permission is sought is unable to demonstrate the requisite five year housing land supply, or its the Housing Delivery Test score is less than 75 per cent.

"In accordance with national planning policy, this policy will not apply in respect of housing development, when the relevant LPAs housing supply falls below five years, or its the Housing Delivery Test score is less than 75 per cent."

4.9 Policy EN18: Areas of Separation

- 4.9.1 Draft Policy EN18 states that 'Areas of Separation' will be maintained to protect areas where there is a risk of coalescence. The emerging policy goes on to identify criterion as to when development proposed within the defined Areas of Separation will be permitted.
- 4.9.2 The supporting policy text advises that the extent, amount and location of the Areas of Separation have been reviewed and it is proposed that the extent of the designation is revised, *"taking into consideration recent developments and planning commitments within these areas, where significant development has taken place outside of the settlement boundary."* The supporting text refers to a landscape assessment which has been produced to assess the extent of the gaps.
- 4.9.3 Having have reviewed the Open Land Designations Study: Landscape Assessment report which has been produced by LUC, including the 'Areas of Separation Assessment' at Appendix C (Ref: EV6), we do not consider that the authorities have provided sufficient justification to evidence why the Areas of Separation boundaries have been extended.
- 4.9.4 For example, with reference to the proposed extension to the Areas of Separation at Broughton, the long-established position in Central Lancashire is to protect areas south of Broughton and on the edge of the Preston Urban Area. There is no evidence to support the assertion that development to the north of Broughton could adversely impact on the separation gap. The basis of the policy, established over many years, has been to protect land south of Broughton from merging with the Preston built up area. The Council has now changed its approach and without justification, it has extended the Areas of Separation all around Broughton. As such, Story Homes objects to the proposed approach to Areas of Separation.

- 4.9.5 Furthermore, like draft Policy EN17 in respect of development proposals in the Open Countryside, draft Policy EN18 has implications for the supply of housing. As such, we consider that in order to ensure compliance with national policy, the policy wording should explicitly state that the development restrictions proposed by the policy will not apply in the event that the relevant Authority in which planning permission is sought is unable to demonstrate the requisite five year housing land supply, or the Housing Delivery Test score of the relevant Authority's is less than 75 per cent.

5 Conclusions

5.1.1 This representation has been produced by Stantec on behalf of our Client, Story Homes, in response to Regulation 19, Publication version of the Central Lancashire Local Plan. This representation should be read in conjunction with the Central Lancashire Housing Needs review and the Central Lancashire Housing Supply review, produced by Stantec on behalf of a consortium of developers including Story Homes, as well as the individual site pro-forma (plus relevant appendices) which set out details of Story Homes' land interests.

5.1.2 Our Client accepts the stated Vision and Objectives set out in the emerging CLLP insofar as they report to aim to deliver enhanced prosperity for the area. However, we object to the Plan on the basis that the policies contained within the Plan will not meet the Vision or Objectives and is not aspirational enough to meet its own needs nor align with the Government's requirement to boost housebuilding as set out in national planning policy. Accordingly, our Client does not consider the CLLP as drafted to meet the tests of soundness set out at paragraph 36 of the NPPF.

5.1.3 Firstly, the Plan is not *positively prepared*:

- The proposed housing requirement is contrived to equate to just 80 per cent of the area's latest LHN requirement based on the Government's latest standard method, in order to 'benefit' from the transitional arrangements set out at NPPF paragraph 243. Indeed, the emerging requirement equates to just 79.1 per cent of the plan area's LHN, when taking account of the latest March 2024 affordability data. The emerging housing requirement is not ambitious and is considerably below recent delivery rates across the plan area. It is our client's contention that the Central Lancashire Authorities should plan to meet at least the area's up-to-date development needs, based on the latest LHN requirement of 1,643 dpa, including meeting the latest standard method LHN requirements for each authority, within the boundary of each authority, as a minimum;
- There is an imbalance in the proposed spatial distribution of housing across the Plan area. The housing requirements across the CLLP do not reflect the demographic needs within the 2023 standard method or the economy led needs which were used to justify an uplift to the 2023 local housing needs; housing has been moved away from where it is needed and where it would generate economic activity.
- The CLLP places significance reliance on brownfield regeneration within Preston City Centre, for which there is no certainty will be delivered as required during the Plan period, particularly in light of our concerns about the deliverability of a number of the proposed allocations identified. Instead, the Authorities need to allocate and release across the plan area, in order to re-address this balance, and ensure that the area's full housing needs are met in terms of the right types of housing types, in the right locations.

5.1.4 The Plan is not *Justified* and *Effective*:

- There is no clear evidence to explain how the development patterns and spatial strategy proposed within the emerging Local Plan have been derived and nor is the proposed site allocation process robust or transparent. The distribution of development across the settlement hierarchy appears to be a result of the quantum of Sites which were favoured by the SHELAA which, in turn, appears to have been determined on an ad hoc basis. Evidence of the Authorities' approach needs to be provided and made available for scrutiny ahead of the Examination-in-Public;

- There is insufficient evidence to justify how the proposed housing requirement has been arrived at – the application of a 77 dpa uplift to conform with transitional arrangements within NPPF2024 is not a justified approach to plan making. Furthermore, there is no evidence to justify the numerical distribution of the area’s housing needs across the Plan area;
- The approach to addressing the area’s full affordable housing needs via a settlement hierarchy based approach is not robustly evidenced. Again, this needs evidence needs to be provided and made available for scrutiny ahead of the Examination-in-Public;
- The Plan proposes a number of non-Green Belt housing allocations for which there is a lack of robust and up-to-date evidence to demonstrate their deliverability during the Plan period. The Authorities have overstated their housing land supply position, particularly in Preston where the inflated housing requirement (to accommodate Chorley’s needs) cannot be met. Furthermore, our supply work also demonstrates that each of the authorities are likely not to be able to demonstrate a 5-year supply of housing on adoption of the CLLP; and
- There is insufficient evidence to demonstrate that exceptional circumstances do not exist to justify the lack of Green Belt release, in order that the area’s development needs are met in full. Indeed, the Central Lancashire Authorities have not demonstrated that it has considered the implications of redistributing homes away from Chorley. Additional land needs to be allocated and safeguarded for development to accommodate housing needs, whilst also addressing the issue of housing imbalance across the Plan area.

5.1.5 The Plan is *inconsistent* with national planning policy:

- The end date of the strategic policies relating to housing land supply is 31 March 2041, however the plan is not anticipated to be adopted until 31 December 2026, and as such, the Plan will not cover a full 15-year period post adoption, as required by NPPF paragraph 22.

5.1.6 It is essential that the Central Lancashire Authorities are able to robustly demonstrate that the spatial strategy is deliverable. This includes an uplift to the housing requirement, which as a minimum should align with the standard method LHN for each constituent authority to be met in full. As currently drafted, the emerging CLLP fails to this is and insufficient land is proposed to be allocated to ensure that the area’s housing needs will be met in full. As such, we conclude that the emerging CLLP is not a sound Plan with regards to the tests set out within the NPPF. Therefore, it is Story Homes position that the Authorities’ should withdraw this Plan and prepare a new Local Plan that follows the new standard method correctly.

5.1.7 We trust that the comments set out within this Representation will be afforded full consideration by the Central Lancashire Authorities in the on-going plan-making process, and we reserve our Client’s right to appear at the Local Plan Examination-in Public to discuss these matters in detail.

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