

This matter is being dealt with by
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Kerry Trueman on behalf of Anne Jordan and
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6th November 2025

Dear Anne Jordan (BA(Hons) MRTPI) and Alison Partington (BA(Hons) MA MRTPI),

EXAMINATION OF THE CENTRAL LANCASHIRE LOCAL PLAN 2023 - 2041

Hearing Statements - Prepared by Story Homes

Matter 2: Hearing Statement

Introduction

1. Marrons has been appointed by our Client, Story Homes Limited (hereafter referred to as "Story Homes") to prepare this hearing statement for the Matter 2 session at the Examination of the Central Lancashire Local Plan 2023-2041.
2. Story Homes' Regulation 19 representation prepared by Stantec UK Ltd (ref ID: A60) responded to the proposed Vision, Objectives and Spatial Strategy chapter of the draft Central Lancashire Local Plan (CLLP). This core representation was supported by several individual site submissions and appendices.
3. We respond to the questions of relevance to Story Homes' previous representations, focusing on the spatial distributions and the site allocation selection process. Story Homes' position in response to question **2.1 f)** is supported by work undertaken by Turley and should be read in conjunction to Turley's representations on behalf of Story Homes for Matters 8 and 9.

Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and Site Selection Process (Policies SS1, SS2)

Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2 supported by robust and up to date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the Plan?

4. Story Homes expressed their support at the Regulation 19 stage for the aspirations set out within the CLLP vision and associated objectives, particularly Strategic Objective

3 on creating sustainable communities and delivering a range of high-quality homes with supporting infrastructure. However, our client is not confident that the very broad ambitions set out in the Spatial Vision will be realised through the policies and allocations as the Councils suggest.

5. In their Regulation 19 representation, Story Homes argued that the sites allocated in the plan appear to be driven by the SHELAA, and not in accordance with the stated spatial strategy in Policy SS1. There remains insufficient justification on the Councils' part for how the SS1's development pattern was derived. In particular, the stance to keep all Green Belt land permanently open is not backed by robust evidence, especially given past Green Belt releases in Central Lancashire which have historically been important to housing delivery.
6. The Councils have rebalanced growth using a revised approach designed only to meet the minimum requirements under the NPPF's transitional arrangements, without a proper review of Green Belt allocations. It has clearly been tailored to achieve a specific outcome. This not an appropriate nor evidence-based approach to ensuring a positively prepared and justified Local Plan, and therefore the draft CLLP is not in line with national policy. As such, we refer the Inspectors to the Minister of State for Housing and Planning, Matthew Pennycook MP's letter¹ concerning PINS recommending as part of the Examination in Public that a Green Belt review be undertaken, in line with national policy, to meet development needs.
7. Policy SS1 is not supported by robust and up-to-date evidence, and the Council have provided insufficient justification for how the development pattern has been derived. Therefore, Story Homes do not consider it to be soundly based.

b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?

8. Story Homes have previously objected to draft Policy SS2 at the Regulation 19 stage due to fundamental concerns regarding the site selection processes and the lack of justification by the Councils for how the settlement hierarchy will be delivered.
9. As noted in their Regulation 19 representation, there is no robust evidence showing how the spatial strategy or settlement hierarchy guided decisions about site allocations. There are inconsistencies within the Site Selection process, with Lower tier settlements with limited services having sites allocated despite poor transport RAG scores in the SHELAA, while better located sites in higher tier settlements have been excluded for issues that appear less severe by the same metrics. We refer the Inspectors to paragraphs 2.4.1 – 2.4.11 of Story Homes Regulation 19 representation (ref: A60, prepared by Stantec), in particular paragraph 2.4.7 for specific site examples.
10. Overall, allocation choices are opaque and ad hoc. The distribution across the hierarchy seems to follow which sites the SHELAA favoured, not a coherent strategy. The strategy appears to have been derived in the reverse to achieve a particular outcome, rather than the evidence-based approach required by national policy. Therefore, Story Homes do not believe that the distribution of development set out in Policy SS2 is indeed soundly based on the Plan's settlement hierarchy and the distribution does not align with the spatial strategy objectives.

¹ MHCLG - Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate (October 2025)

f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?

11. Story Homes do not agree that the distribution of employment related development appropriately accounts for national and regional programmes and strategies, and therefore the CLLP is not justified and not consistent with national policy.
12. Story Homes' Regulation 19 submissions identified that the Plan failed to provide for the additional needs and demand arising from the development of the National Cyber Force Headquarters (NCF) on the Samlesbury Enterprise Zone. As a result, the Plan's proposed distribution of employment development fails to take account of national, regional and local economic strategies.
13. Previously submitted evidence identified that this national investment would generate additional needs for housing and employment land within the Plan's period. The Government's investment in the defence and cyber sectors within Central Lancashire represents a unique opportunity to attract further investment, recognising an economic agglomeration effect². The Plan makes no attempt to recognise this opportunity and provide a supporting planning framework to attract additional supply-chain businesses or to accommodate highly skilled labour.
14. The applicable NPPF 2023 (specifically Paragraphs 85, 86 and 87) lends significant weight to supporting economic growth and productivity (paragraph 86) having regard to national economic strategy and local policies for economic development and regeneration. It expects policies to '*recognise and address the specific locational requirements of different sectors*' (paragraph 87). The Modern Industrial Strategy (MIS) identifies the 'defence' and 'digital and technology' (including cyber security) as national priority growth sectors.
15. The recently published final Lancashire Growth Plan continues to identify the strategic importance of the A59 'Growth Corridor', which includes Samlesbury Enterprise Zone, and is clear to document the NCF as one of '*several major defence and cyber innovation programmes that align with national strategic priorities*'. It proceeds to provide a clear articulation of the programme and estimated economic impacts of the investment: '**National Cyber Force HQ: Set to be permanently based in Samlesbury from 2025, this joint initiative between the Ministry of Defence and GCHQ will support around 2,000 personnel and generate an estimated 3,120 direct and indirect jobs. The Lancashire Cyber Partnership is embedding the NCF within the local economy to drive innovation and job creation.**' (emphasis underlined)³
16. Despite the expectations explicitly set out in national and local strategies, the Plan includes only one passing reference to the NCF, where it suggests future working with Lancashire County Council '*to understand the opportunity this establishment will create, the timescale and how it might affect the wider economy.*'⁴ The Employment Land Study (ELS) upon which policies relating to employment related development are justified confirms that the methodologies for calculating need '*make no allowance for*

² The identified opportunity to capture additional business investment and create a broad range of job opportunities for residents of Lancashire has been articulated by numerous local stakeholders including Lancaster University in the last 12 months: <https://www.lep.co.uk/education/how-lancashire-is-enticing-and-training-the-cyber-defenders-of-the-future-4981436>

³ Lancashire Growth Plan (2025), LCCA, page 29.

⁴ Central Lancashire Local Plan Publication Version (2025), paragraph 5.11.

*any major public sector programmes which might generate jobs above the baseline*⁵, separately referencing the NCF as one such known investment. Story Homes' response to question 8.1 in Turley's Matter 8 statement confirms that the minimum need for employment land in the plan (173 ha) as a result excludes any additional need generated by the NCF. Similarly, Turley's Matter 9 statement also confirms no account has been given in the distribution of the responding employment land provision and the identification of appropriately located and scaled strategic site allocations.

17. This decision can be contrasted with that taken by the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, which allocated land for employment, housing and wider mixed-use development (1,100 homes and 45 ha of employment land) known as the Golden Valley near GCHQ. This has been progressed through an SPD and subsequent planning applications, with the National Cyber Innovation Centre accommodated within the allocation referenced in the National Digital and Technologies Sector Plan as being expected to leverage a further £1 billion in investment.⁶
18. Lancashire County Council (LCC) have clearly articulated the importance of identifying comparable sites within the Local Plan, stating in their representations at the Regulation 19 stage that: *'There is a need for strategic sites to be allocated in the Local plan to meet growth needs and to support specialised needs.'*⁷ Similarly, in the SoCG between LCC and the Councils, they identify that: *'a comprehensive review of long term strategic employment need across the three boroughs, including specialist sectors will be important as LCC believes that the Enterprise Zone in Samlesbury is likely to reach capacity early in the plan period.'*⁸ This is supported by information shared by LCC which identified that there were active and advanced enquiries as of July 2025 which would result in all seven of the remaining plots on the Enterprise Zone being taken up, with timescales for development estimated at 18 months to 2 years⁹.
19. Ultimately, the CLLP does not appear to recognise this through a long-term, key high growth strategy (first with the Samlesbury Enterprise Zone linked the BAE systems, and now with the NCF headquarters) which aims to attract high quality, highly skilled jobs. There is a need to identify additional strategic-scale sites which provide the opportunity to realise the investment opportunities arising from the NCF and wider economic ambitions established through the Lancashire Growth Plan. Similarly, the Council will need to attract and retain skilled employees in the area, and they will need sufficient and appropriate housing along the A59 'Growth Corridor' to do so. The Councils have alternatively focused on regeneration and high-density schemes in Preston, which in turn undermines the economic growth ambitions. Thus, the Plan's omission of all sites requiring Green Belt release has removed the opportunity for Central Lancashire to deliver high quality and aspirational homes suitable for this planned new workforce.
20. Additional detail on these issues is provided in response to Matters 3, 8 and 9 which identifies that the Plan's failure to take appropriate account and provide for the NCF investment means that it is unsound when assessed against the requirements of paragraphs 61, 85, 86 and 87 of NPPF 2023.

⁵ Central Lancashire Employment Land Study – Update (2024), paragraph 3.8.

⁶ The UK's Modern Industrial Strategy: Digital and Technologies Sector Plan (2025), pages 39 and 68

⁷ D12: LCC Response letter to Regulation 19 CLLP.

⁸ DC11: Statement of Common Ground between the CLAs and Lancashire County Council, paragraph 5.31.

⁹ LCC note in the information shared that all of the enquiries would be LDO compliant and could therefore secure planning permission within 28 days.

2.2 What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

21. In their Regulation 19 representation, Story Homes expressed concern 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.’
22. Not only has the settlement hierarchy not been adequately justified, but as noted above at 2.1. b), Story homes do not agree that the Councils have provided robust evidence to demonstrate how the spatial strategy or settlement hierarchy has guided the allocation of sites. The Site Selection Note (H016) claimed allocations reflect both the SHELAA and the spatial strategy and hierarchy, yet the SHELAA seems to decide the allocations alone. The process lacks a transparent methodology for scoring sites, weighing constraints, or using the settlement hierarchy in decisions.
23. Overall, the distribution hierarchy seems to follow the sites favoured by the SHELAA, not a coherent strategy. For this reason, Story Homes argue that Council’ have not justified how the settlement hierarchy will be delivered, and therefore the draft CLPP is not consistent with national policy.

2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

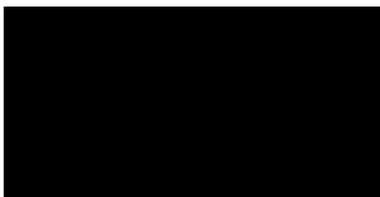
- a) **Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?**
 - b) **Were constraints given relative weight in the site selection process? If so, how was this determined?**
24. No, the site allocation selection process lacks a transparent methodology. At the Regulation 19 stage, Story Homes critiqued the site selection process, arguing that the Councils have not presented a robust methodology for how Sites were scored in terms of constraints or what weighting (if any) was given to the Site’s position in the settlement hierarchy. There are inconsistencies in the assessment of sites since the SHELAA contains varying degrees of information about each Site (see Chapter 2.4 of Story Homes Regulation 19 representation for site-specific details). Moreover, the Spatial Strategy has not been shown to be deliverable or evidence-led (see responses to 2.1 – 2.3 above). The site choices seem to have come first, with strategy following second, which reveals a flawed site selection process. Therefore, Story Homes believes that the determination of whether Site was allocated (or not) was on not on a robust and objective, but on a subjective basis.
 25. Story Homes have previously rejected the conclusion contained within the ‘Site Selection Process’ Note (Ref: HO16) 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). The Councils argument is flawed because they have overstated their housing land supply position, particularly in Preston, and consequently the identified

need will not be met. Additionally, as demonstrated by Stantec's supply work¹⁰, after redistribution, each authority is unlikely to be able to demonstrate a 5-year supply of housing upon adoption of the CLLP. Therefore, Story Homes firmly argue that a Councils' approach to site selection is lacking and has not resulted in the sufficient and appropriately justified allocation of sites in line with national policy.

26. Furthermore, this distribution is likely to pose challenges for the achievement of sufficient delivery of affordable housing, particularly in Chorley. Market housing is needed since Section 106 agreements are the only mechanism to deliver affordable housing, and in reality, this will rely on greenfield development in and around Chorley.

27. It is also important to note that a key implication of the Councils site selection process and the decision to omit all Green Belt sites, is that there are major available and deliverable brownfield sites, such as the former Camelot Theme Park site that was previously identified as draft housing allocation at the Regulation 18 stage, which no longer have policy basis to come forward. This policy vacuum significantly does not align with the spatial vision and objectives of the CLLP, that proposed to adopt a brownfield first approach. This issue is raised in relation to Policy EN15 in our Matter 12 Hearing Statement.

Yours sincerely,



Dan Mitchell
Partner

Marrons



Word count: 2607

¹⁰ Housing Land Supply Update Note (October 2025), Stantec UK Ltd