

This matter is being dealt with by  
Dan Mitchell

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Kerry Trueman on behalf of Anne Jordan and  
Alison Partington

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6<sup>th</sup> 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 3: Written Statement**

#### **Introduction**

1. Marrons has been appointed by our Client, Story Homes Limited (hereafter referred to as "Story Homes") to prepare this written statement for the Matter 3 of the Examination of the Central Lancashire Local Plan 2023-2041.
2. Story Homes' Regulation 19 representation prepared by Stantec UK Ltd (Ref: A60) commented in detail on Policy HS1. We respond to the questions of relevance to Story Homes' previous representation below.

#### **Matter 3 – The Housing Requirement (Policy HS1)**

#### **Issue 3 - Is the identified housing requirement justified and consistent with national policy?**

**3.1 Is the housing requirement of 23,652 homes during the 2023 – 2041 period (policy HS1) and a figure of 1,314 per annum (dpa), justified by the Council's evidence? Are the assumptions of the 2024 Housing and Economic Development Needs Assessments and Addenda (Doc HO10, HO11 and HO12) soundly based, particularly in relation to:**

- a) Identifying a baseline figure;
- b) Forecasts for economic growth;
- c) Alignment of jobs and workers; and
- d) Assumptions of housing requirements arising from economic growth?

3. The Central Lancashire Authorities have identified insufficient sites to meet the region's housing requirements as outlined in the draft CLLP.
4. The proposed 23,652 homes are distributed across the three Council areas, planning for 6,012 homes in Chorley, 9,360 in Preston, and 8,280 in South Ribble. Story Homes' Regulation 19 submissions evidenced that the average of 1,314 dpa relies on a

pessimistic employment-led need of 1,237 dpa, ignoring major growth drivers like the National Cyber Force Campus at Samlesbury, which is expected to create approximately 3,120 jobs. Recent delivery averages 2,032 dpa and the Government's new standard methods shows a higher need of 1,643 dpa in December 2024 and 1,663 dpa using the March 2025 affordability data, with 616 homes in Preston, 492 in South Ribble, and 554 in Chorley. Story Homes perceive the extra 77 dpa as a contrived step to meet the transitional rules, and not evidence based, and still this only reaches 79.1 percent of the latest Local Housing Need (LHN) requirements, therefore below the required 80 percent. The Plan is unambitious, evidently at odds with the Lancashire Growth Plan (2025) and will simply be unable to meet the housing and economic needs arising across the three Local Planning Authorities. It has been developed with the aim of minimising growth, contrary to the relevant plan making policies within both the 2023 and 2024 versions of the NPPF.

5. Story Homes maintains their position that the draft CLLP should be withdrawn and recalculated under NPPF 2024 to set a higher, evidence-led requirement that reflects actual growth and distributes transparently across the three Councils.
6. Furthermore, as argued at the Regulation 19 stage, the plan period requires extension since the strategic policies relating to housing and employment land supply have an end date of 31<sup>st</sup> March 2041, and therefore the plan will not cover a full 15-year period post adoption. The minimum requires extension to 2042 will necessitate an increase to the overall housing requirement.

**3.2 How were the housing requirements of each authority arrived at? Will the proposed requirements adequately address the needs of each authority? Is the Plan sufficiently clear in relation to how a failure to supply housing in one authority will impact upon the other two authorities in relation to five year housing land supply?**

7. No, the needs of each authority have not been adequately addressed in the draft CLLP, and the proposed strategy risks under-provision, particularly in Chorley, which has the highest identified need.
8. The Councils' redistribution of housing is not evidence-based. It relies on a poorly justified settlement hierarchy and a SHELAA process that discounted Green Belt sites and then used supply to dictate need. As a result, housing has been shifted away from where need arises, which is seen most drastically in Chorley which has the highest need under the standard method (564 dpa) but is given the lowest requirements (334 dpa), representing an approximate 40% shortfall. Across all three authorities the plan sits about 25 percent below the latest LHN requirement, with Chorley meeting roughly 60 percent its need. Our client is very concerned as this approach will restrict choice, provision of affordable housing, and the right mix of homes from being delivered since dense city centre regeneration in Preston cannot substitute for family housing needed in suburban Chorley. Not to mention the fact that delivery in Preston is overstated, constrained by significant viability risks for the city centre sites.
9. Additionally, there is inconsistency in the supporting evidence, since the Councils' economic-led housing strategy implies a more balanced split and yet overlooks the A59 Growth Corridor and the National Cyber Force Campus at Samlesbury, which will concentrate jobs and require housing delivery nearby.
10. Moreover, the Plan is not clear on how a shortfall in one authority and failure to provide a five-year housing land supply (5YHLS) will be treated in the joint plan context in terms of impact on the other two authorities. It remains unclear whether 5YHLS will be tested

for each authority separately, or at a joint plan level. Nor whether surplus will offset deficit in another, and how any distribution triggered and monitored.

11. A sound plan should meet, as a minimum, each authority's latest standard method LHN and provide a broad range of deliverable sites across the Plan area, including Green Belt release where justified. The current approach in the draft CLLP is not positively prepared or justified, and consequently Story Homes are of the firm opinion that the Plan should be withdrawn. At the very least, the Plan should be paused, so that the requirement can be increased to meet need fully, a Green Belt review undertaken and the distribution reviewed to align with where growth and deliverability exists.

**3.3 In relation to Affordable Housing Needs, is the identified need for 438 dpa based on robust, up-to-date information? How has this been considered in the overall housing requirement?**

12. As argued by Story Homes at the Regulation 19 stage, the Councils' approach to addressing the area's full affordable housing needs via settlement hierarchy is not robustly evidenced.
13. As already established, the distribution in HS1 already underprovides against the latest LHN, and this also has implications for affordable housing allocations since there is a risk that they will not match where need actually arises. Chorley is most at risk, since the CLLPs requirement is far below the updated LHN.
14. The settlement hierarchy set out at draft Policy SS2, proposes Preston Urban Area as a primary focus for growth in Central Lancashire. This approach to distribution will not provide the appropriate mix of housing that fully addresses the area's housing needs, such as family homes, and risks weaker affordable housing outputs than growth in suburban areas like Chorley.
15. Note, affordable housing is covered in more detail in the Hearing Statement for Matter 7 (Housing Policies).

**3.4 Does the requirement adequately recognise the impact of housing need arising from strategic employment allocations and regional growth strategies? What assumptions have been made in relation to this?**

16. No, the housing requirement does not recognise employment-related growth and the associated increased demand for housing (nor the range of types and tenures) resulting from employment opportunities within Central Lancashire.
17. At the Regulation 19 stage, Turley provided a critique of the planned provision of employment land in the CLLP on behalf of Story Homes. The economic-led housing scenario presented by the Councils fails to take account of the A59 'Growth Corridor' and emerging Lancashire Growth Plan, which proposes a £20bn investment over 10 years and the National Cyber Force Campus planned at Samlesbury, which is estimated to accommodate over 3000 jobs (direct and indirect) and is set to provide significant levels of new, highly skills employment in the area. This evidenced our client's argument that the Plan has overlooked the need to support economic ambitions with developments specially to supply the labour force behind this growth. For example, proposals for Cuerdale Garden Village.

18. Story Homes maintain their position that the Plan does not allow for sufficient development to come forward in areas where need for development is arising due to economic-led growth, and therefore it is not positively prepared or justified.

19. Note, Story Homes' position regarding employment land need and allocations is covered in detail in their hearing statement for Matters 8 and 9 prepared by Turley.

Yours sincerely,



**Dan Mitchell**  
**Partner**

Marrons

