

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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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 7: 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 7 session at the Examination of the Central Lancashire Local Plan 2023-2041.
2. Story Homes Regulation 19 representation (Ref: A60) commented on several of the policies contained within Chapter 4: Balanced Housing Market. We respond to the MIQ questions of relevance to Story Homes' previous representation below

Matter 7 – Housing Policies (Policies HS5 – HS13)

Issue 7 – Does the Plan set out positively prepared housing policies which are justified, effective and consistent with national policy?

7.2 a) Does Policy HS6 provide an effective framework for ensuring an appropriate mix of housing will be delivered over the plan period? Does it provide sufficient flexibility to ensure site specific considerations are taken into account?

3. Story Homes do not agree that Policy HS6 provides sufficient flexibility to ensure site specific considerations are taken into account in determining appropriate housing mix.
4. In their Regulation 19 representation, Story Home stated their support for linking housing mix to housing needs but expressed concern that tying the policy so rigidly to the HNDA is too inflexible since this provides only a snapshot based on 2018 ONS projections and is grounded primarily on historic trends and existing housing stock. Additionally, due to the lack of consideration of market factors, this approach risks missing shifts in housing needs, such as the post Covid-19 demand for larger homes due to homeworking arrangements. As such Story Homes previously recommended that the policy should be amended to be provide sufficient flexibility by allowing market

evidence, site context, and local character to shape the housing mix. This has not been taken on board in Councils' proposed Schedule of Minor Amendments (CD03).

b) Are the requirements relating to the provision of homes that comply with M4(2) and M4(3) of the building regulations justified by evidence relating to need and viability and are they consistent with national policy? Would it ensure the needs for specialist housing will be met over the plan period?

5. Story Homes previously commented that the requirement for all dwellings to be built to M4(2) accessible and adaptable standard lacks specific local justification beyond general aging trends. Their evaluation of the HNDA within the Regulation 19 representation presented a strong case that the HDNA appears to lack any detailed analysis of the house requirements with justified a blanket application of the options M4(2) standard. Our client recommended that requirement b) should be omitted as there is not sufficient evidence to justify such a policy approach. This has not been taken on board as a minor amendment (CD03).
6. Story Homes maintain that the Councils' case for M4(3) wheelchair accessible standard has also been overstated within the evidence base and therefore within Policy HS6. Their Regulation 19 representation evidenced that the fixed quotas are not clearly linked to locally evidenced need, which in turn risks the distortion of delivery.

c) Are the minimum density requirements justified and appropriate? What account has been taken in the density requirements for the delivery of on site BNG?

7. At the Regulation 19 stage, Story Homes expressed their support for the identification of minimum housing densities in line with NPPF paragraph 130, and the flexibility provided as to when lower densities will be permitted. However, our Client noted: *'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.'* This is particularly a concern in the case of Chorley, where the draft Local Plan appears to shift need into city and town centres to reduce local allocations, despite there being demand in these areas for both market and affordable housing will now be unmet.
8. Story Homes previously recommended the Councils lower or refine the minimum density standards to avoid overdevelopment and protect design quality, family housing needs, open space, biodiversity net gain and flood mitigation. This change is required to ensure the minimum density requirements are appropriate. However, it is important to note that in doing so, the Councils' will likely be required to identify additional deliverable sites across the plan area.

7.3 a) Does Policy HS7 provide an effective framework for maximising the delivery of affordable housing over the plan period? Based on the thresholds and requirements in Policy HS7, will affordable housing needs be met?

9. Story Homes maintain the argument raised in their Regulation 19 representation that Policy HS7 is not justified and will not be effective.
10. The Policy sets a minimum 30 percent to 35 percent affordable housing provision by settlement tier, yet the Councils have not clearly evidenced how the needs specified in the HNDA have been translated into this settlement hierarchy-based approach. This lack of justification is particularly concerning given previously raised concerns in

respect of the HNDA methodology¹. Thus, Story Homes maintains their objection that there is a significant risk that Central Lancashire's affordable housing needs will not be met in full under the proposed framework.

11. This risk is increased by the fact that the draft Local Plan's spatial strategy directs housing growth to locations, particularly Preston Urban Area, where viable delivery of affordable housing is challenging. As such, 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.

b) Is there convincing evidence to show that affordable housing requirements, including on specialist older persons housing, would be viable? How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information? Is the use of "pragmatic scenarios" within the Whole Plan Viability Assessment a reasonable approach?

12. Story Homes' Regulation 19 representation identified that viability could be negatively impacted by the high percentage of affordable homes planned within Chorley. The Chorley HNDA identifies an annual need for 162 affordable homes, and Policy HS1 proposes that just 334 dpa in total are planned to be delivered within Chorley, which equates the quantum of affordable housing to be 50 percent of homes planned to be delivered within Chorley. This clearly does not align with the policy requirement.
13. As argued above at 7.3a), our Client firmly believes that the Councils have not provided convincing evidence to show that affordable housing requirements would be viable. Moreover, Story Homes feel strongly that additional sites should be allocated where need and viability are strongest, especially in Chorley.
14. Regarding the use of 'pragmatic scenarios' in the Councils' Main Viability Report (Doc IT05), Roger Hannah's Viability Study² (on behalf of the consortium) highlighted concerns that the proposed policy requirements have the potential to impact on housing delivery due to insufficient assessment of benchmark land values and conclusions drawn from the 'pragmatic scenario' testing, with no reference to the 'worst case scenario' testing. Story Homes strongly argue that this is not a reasonable approach for Local Plan viability testing, which should include a buffer to ensure that policy provisions will not impact on the deliverability of sites.

c) Is there convincing evidence to justify the proposed tenure split for affordable housing units? Does it accurately reflect the requirements for affordable housing in the Housing Needs and Demand Assessments? Is it sufficiently flexible?

15. Policy HS7 identifies specific affordable tenure splits for each Council. Sufficient flexibility is provided for cases where it can be robustly demonstrated that an alternative split meets an independently assessed proven need, or it is demonstrated not otherwise be financially viable.
16. At the Regulation 19 stage, Story Homes highlighted that no affordable rent has been earmarked for delivery in Chorley, which raises the question of whether the needs of those seeking affordable housing in Chorley are adequately addressed.

¹ Ref: A60_Story Homes_Supp 2 - Stantec's Central Lancashire Housing Need Report (2025)

² Ref: A60_Story Homes_Supp 3 – Roger Hannah's Representation in Respect of Central Lancashire Local Plan Viability Assessment (2025)

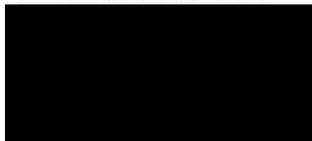
7.7 Does Policy HS11 provide an effective framework to ensure the delivery of an adequate supply of custom and self-build plots over the plan period? Is the policy consistent with national policy?

17. National planning policy seeks to meet identified housing need, assessing size, type and tenure for different grounds, including 'people wishing to commission or build their own homes' (NPPF paragraph 63). At the Regulation 19 stage, Story Homes stated their support of Policy HS11, insofar as it sets out criteria to enable occupiers the ability to influence the design of self-build and custom-build housing. It was suggested that the new Local Plan earmarks specific sites for the delivery of such housing, to ensure the Councils met their legal duty under sections 2 and 2A of the Self Build and Custom Housebuilding Act 2015 to give enough suitable development permissions to meet the identified demand. This recommendation has not been taken on board in the Councils' proposed schedule of minor amendments (CD03) nor responded to in the Regulation 19 Consultation Response (CD10).

7.8 Does Policy HS12 provide an effective framework that would ensure the needs for specialist housing will be met over the plan period? Does the evidence provide a robust assessment of the need for specialist housing? Given the need for older persons housing in particular outlined in the HNDAs, is a criteria based approach to meeting this need appropriate?

18. In their Regulation 19 response, and in reference to Stantec's Housing Needs report on behalf of the consortium³, Story Homes challenged the evidence assessing the need for older person's housing. It is considered flawed as it 'bakes in' the current rate of provision per head and estimates the additional provision that would be required. By locking in a past assumption into the calculation, the outcomes will largely reflect the past rates of specialist homes per older resident and not actual need. Alternatively, a robust, need-led assessment, such as the 'Housing in Later Life' toolkit, should be used. Based on this evidence, Story Homes are of the firm opinion that Policy HS12 is unlikely to provide an effective framework to ensure an adequate supply of specialist accommodation will be met.

Yours sincerely,



Dan Mitchell
Partner

Marrons



³ Ref: A60_Story Homes_Supp 2