

This matter is being dealt with by  
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Kerry Trueman on behalf of Anne Jordan and  
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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 12: 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 12 of 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 7: High Quality Environment. We respond to the MIQ questions of relevance to Story Homes' previous representation below.

#### **Matter 12 – Environment Policies (Policies EN1-EN19)**

**Issue 12 - Does the Plan set out positively prepared policies in relation to the environment which are justified, effective and consistent with national policy?**

**12.1 Are the requirements of Policy EN1 clear and would they be effective? Are they consistent with requirements set out in the 'Key Development Considerations' for the site allocations? Are the requirements justified by appropriate evidence, having regard to national guidance? What is the justification for setting the nationally described space standards and the water efficiency requirement at 110ltrs per day? How is this supported by evidence?**

3. In their Regulation 19 representation, Story Homes stated their support of Policy EN1's use of national design standards. However, stricter local requirements would need to be robustly justified and underpinned by relevant and up-to-date evidence. It is critical that design standards do not undermine housing delivery, and that they should fit local context and be practical to achieve. Furthermore, Policy EN1 should avoid adding burdens that go beyond statutory requirements, given the cumulative costs already faced by schemes (e.g. biodiversity net gain, the Building Safety Levy, landfill tax, and

other obligations). Additional requirements risk making schemes less viable, which would reduce housing delivery and undermine the provision of affordable homes.

4. Story Homes objected to the Policy EN1's requirement for major residential schemes to achieve a 'green light' against each of the Building for a Healthy Life considerations. The guidance itself notes there are many circumstances where amber lights cannot be avoided due to circumstances beyond the local authority and/or developers' control, and as such flexibility should be reflected in EN1. This has not been taken on board in the minor amendments, and therefore Story Homes maintain their position that Policy EN1 is not justified.
5. Additionally, the requirement that 'all new dwelling must comply with the nationally described space standards', has not been clearly justified by the Councils. As an optional technical standard, its adoption into the Local Plan should be based on evidence of a local need for higher space standards, which has not been provided. As such, Story Homes do not consider this policy requirement justified.

#### **12.2 Are the requirements of Policy EN2 clear and would they be effective? Are they consistent with requirements in other policies within the plan?**

6. At the Regulation 19 stage, Story Homes questioned how effective the proposed policy approach of giving priority to people over vehicles as part of all major development schemes will be in achieving the desired outcome of ensuring effective and considered design. This is particularly questionable since comprehensive scheme masterplanning needs to use land efficiently, which may impact on existing public rights of way, but result in better outcomes for pedestrians overall. It is important to ensure that flexibility is applied to design criteria to enable subjective assessment on a site-by-site basis, taking account local context, character and setting.

#### **12.5 Are the requirements of Policy EN5 clear and would they be effective? On what basis were the sites allocated for Green Infrastructure both within the policy and on the policies map identified and are they justified?**

7. At the Regulation 19 stage, Story Homes stated their support for the principle of draft Policy EN5 insofar as it seeks to protect and enhance green infrastructure across the Plan area. However, Story Homes objected to the requirement for development proposals to "prioritise" the protection, quality, connectivity and multi-functionality of green infrastructure. The Councils have not provided a robust justification as to why green infrastructure should be prioritised over other considerations, such as design, drainage, and viability matters.
8. The Councils response, as stated in document CD10, is that the protection of Green Infrastructure is their default position and that 'the statement regarding 'prioritising' GI is not intended to exclude the consideration of other policy.' Yet, the fact remains that this is not clear using the word 'prioritised' in the policy, and therefore Story Homes maintain their position that this policy approach is not justified.

#### **12.6 Are the requirements of the Policy EN6 clear and consistent with national policy? Would they be effective?**

9. Policy EN6 is not consistent with the national policy requirement for the provision of 10 percent Biodiversity Net Gain, as set out within Schedule 7A of the Town and Country

Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In their Regulation 19 representation, Story Homes objected to the draft Policy on the basis that it is currently worded as 'at least 10%' BNG provision. Certainty should be provided by establishing a fixed 10 percent BNG requirement, and omission of 'at least' was recommended, yet has not been taken forward by the Council.

10. Noting onsite BNG provision is prioritised within national policy, Story Homes have previously questioned the approach to delivery of off-site BNG set out in Policy EN6. A sequential approach is proposed, requiring off-site provision within the LPA boundary ahead of off-site provision within Central Lancashire, however sufficient evidence has not been provided by the Councils to justify this sequential approach.
11. The Councils have defended this, stating in document CD10 that 'the availability and affordability of off-site Biodiversity Units will be the primary driver of where off-set BNG delivery will be delivered, the policy allows for deviation where justification is provided.' However, this 'primary driver' is not stated in the policy nor mentioned in any of the supporting text concerning off site provision of BNG.
12. Additionally, the Council argues 'the justification for the additional hierarchy for BNG delivery is so that the movement of biodiversity away from the LPAs and Central Lancashire, resulting from development in those boundaries, is minimised.' While the intention to have off-site BNG to be delivered locally where possible is logical as the next option following on-site provision (which is prioritised within national policy), the point remains that the Councils sequential approach has not been evidenced. The preference of 'off-site, within the LPA boundary' over 'off-site, within Central Lancashire', does not necessarily ensure that the BNG delivery will have the most benefits for nature as the policy intends. Nor does this hierarchy allow developers the flexibility potentially required to best support the opportunities and desired outcomes of the Lancashire Local Nature Recovery Strategy (2025). Therefore, Story Homes does not consider Policy EN6 to be clear and effective and they maintain their objection.

**12.10 Are the requirements of the water related policies EN10-EN12 clear, effective, and would they be consistent with national policy? In particular:**

**b) Does Policy EN10 adequately reflect considerations in relation to flooding from all sources, including surface water flooding (pluvial and sewer)?**

13. Betts Hydro have previously considered the wording of Policy EN10 on behalf of Story Homes at the Regulation 19 stage. Story Homes representation requested Policy EN10 is amended to directly allow site-specific surface water mapping and modelling information to be considered for planning applications.
14. An updated Central Lancashire Level 2 SFRA dated June 2025 has been provided. Story Homes reiterate the importance of the Councils SFRA being a 'live' document that must be kept up to date with new information and the most recent evidence.

**12.12 Are the requirements of Policy EN14 clear, effective and consistent with national policy. In particular, should the policy directly refer to water quality and unstable land? How will significant harm to soil quality be defined?**

15. As discussed in their Regulation 19 representation, Story Homes do not consider Policy EN14 to be adequately justified as it is not clear what is meant at criterion 2c by

“significant harm to soil quality”. In the absence of a definition, it is unclear what this requirement means in a practical sense nor what the implications of the policy are for greenfield residential development. Therefore, Story Homes do not consider Policy EN14 to be clear or effective, and support the Inspectors question concerning the definition of harm to soil quality.

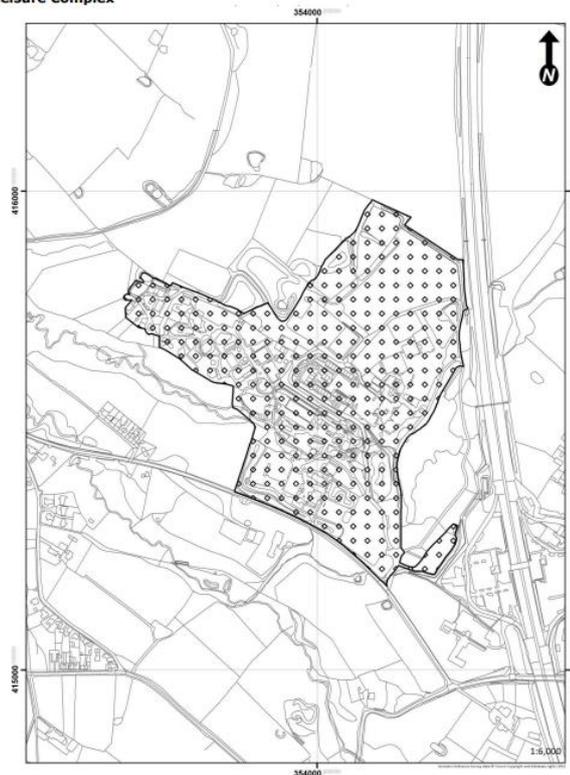
**12.13 Are the requirements of Policy EN15 clear, effective and consistent with national policy. In particular:**

**b) Would policy EN15 provide an effective basis for directing a decision maker in light of the changes to national policy in the NPPF Dec 2024?**

16. No, Policy EN15 is not clear and effective and not consistent with national policy. Story Homes maintains their Regulation 19 position that if the Council is to include a Green Belt policy that seeks to add ‘local detail’ to the national Green Belt policies, then it should reflect the government’s latest planning policies and guidance in relation to the Green Belt in order to be effective.
17. The Councils’ Proposed Schedule of Minor Amendments (Doc CD03) includes changes to Policy EN15 so that the wording now refers to NPPF 2024 paragraph 154 h) i to vi in relation to the listed development typographies. However, this factual correction in response to the NPPF update is not carried forward in a correction of Bullet 1 of the policy, which still refers to December 2023 NPPF.
18. Despite the minor amendments, the policy remains largely tied to the 2023 NPPF. While the Council may hope to rely on transitional provisions and be examined against NPPF 2023, decision making must still account for the December 2024 NPPF as material consideration. As currently drafted, Policy EN15 is not consistent with the revised Green Belt paragraphs in NPPF 2024.
19. Policy EN15 refers to NPPF paragraph 154 as a ‘closed list’, which is not consistent with the NPPF 2024’s introduction of the further non-inappropriate route at paragraph 155, the new ‘grey belt’ approach, plus the ‘Golden Rules’ at paragraphs 156 to 158. Additionally, Policy EN15 does not align with the requirement to identify safeguarded land for longer term needs (NPPF paragraph 149 c and d), despite the local precedent and reliance, particularly in Chorley and South Ribble, and prior discussions at the Regulation 18 stage.
20. Criterion g) of Policy EN15 concerns limited infilling or partial or complete redevelopment of previously developed land (brownfield). To check whether a proposal can be considered in principle, it asks for a Green Belt Assessment concerning impacts on openness, and signposts to affordable housing evidence. The policy wording does not define what assessment outputs are expected and how this informs decision-making. Moreover, this tie to affordable housing evidence is not aligned to the 2024 NPPF which no longer links paragraph 154 g) to identified affordable housing need. The threshold should just be ‘no substantial harm to openness’. Therefore, Policy EN15 lacks clarity regarding what exactly applicants need to demonstrate and how schemes should be assessed by officers.
21. By omitting safeguarded land, failing to engage with the grey belt concept, and clinging to the NPPF 2023, Policy EN15 would not give the decision maker a reliable basis to balance openness, purposes, need and location in line with NPPF 2024. Thus, Policy EN15 will be hard to apply and vulnerable in the decision-making process (particularly at appeal).

22. Furthermore, Story Homes have previously argued that Policy EN15 is fundamentally undermined by the fact that the draft Local Plan has uncertain foundations. The Plan does not meet housing needs in full, yet the Councils claim to have no exceptional circumstances to alter Green Belt boundaries, and they have removed previously suggested site allocations relying on Green Belt release without robust justification. For example, the former Camelot Theme Park, which was earmarked for Green Belt release in the earlier iteration of the draft Local Plan. Ultimately, this is fundamentally at odds with national policy that expects local planning authorities to examine all reasonable options, and where necessary to prioritise previously development land, and to plan for housing needs comprehensively (NPPF paragraphs 149, 110 and 115). Therefore, regardless of the housing overall, there warrants a different approach which takes the clear exceptional circumstances for Green Belt release into consideration.
23. For the reasons outlined above, Story Homes do not consider Policy EN15 to be clear, effective and consistent with national policy.
24. As a further point, we refer to the objections made in our Matter 2 Hearing Statement, in relation to the former Camelot Theme Park site and the implications of the Councils' flawed site selection process. Consequently, the opportunity at Camelot, the largest brownfield land site in Central Lancashire, has been ignored. This is made worse by the fact that the Camelot site has been redundant for decades and available now for development and is therefore the sort of land the government is keen to bring forward for development.
25. There is a clear policy gap due to the lack of provisions for the redevelopment of previously developed land (brownfield land) within the Green Belt. Unlike Policy EN15, the Chorley Local Plan (2015) contains a clear and detailed policy (Policy BNE5) with stated criteria and specific tests for reuse, infill and redevelopment. Moreover, the Camelot site was previously endorsed by Inspector Shelagh Bussey in 2013 during the Examination in Public for the Chorley Local Plan, who notes the site's importance in ensuring the Plan be found sound:

*'However, in the light of what was observed at my accompanied inspection of the Park Hall/Camelot Leisure Complex, its boundaries should be amended ... Although the revised boundaries may not reflect land ownership boundaries, I conclude that they would correctly define the extent of this previously developed Green Belt site. Therefore, the Plan would not be sound unless the Policies Map was amended accordingly, as detailed by (MMMEC5).'*

**Map 1 – MMMECS: Previously developed site boundary for Park Hall/ Camelot Leisure Complex**


26. Accordingly, Story Homes strongly argue that it was wrong for the Councils to omit the Camelot site allocation, as well as its current policy designation as previously developed land, from the Publication version of the CLLP because it is now silent on the extent of brownfield land available, and this decision directly conflicts with the CLLP's spatial strategy's prioritisation of brownfield land (Policy SS1).

**12.15 Are the requirements of Policy EN17 clear, effective and consistent with national policy? In particular, is the policy consistent with policy EN15 and paragraph 84 of the NPPF?**

27. No, Policy EN17 is not clear or effective, and is not consistent with national policy. It also conflicts with Policy EN15 as currently worded.
28. At the Regulation 19 stage, Story Homes highlighted the importance of Policy EN17 being aligned with national housing delivery policy. The December 2024 NPPF confirms that, for housing proposals, restrictive policies can be treated as out of date where an authority lacks a five year housing land supply or scores below 75 percent on the Housing Delivery Test. Since EN17 affects housing supply, it was recommended by Story Homes that the policy should include an explicit safeguard that its restrictions will not apply to housing whether either trigger is met, to ensure decisions follow the presumption in favour of sustainable development in accordance with the NPPF. This suggested amendment has not been taken on board.
29. When considered against NPPF paragraph 84 for isolated homes in the countryside, Policy EN17 is not consistent because it does not clearly map the five permitted circumstances outlined in paragraphs 84 a to e. Policy EN17 omits two key routes, optimal viable use or enabling development for heritage assets (84 b), and subdivision of an existing dwelling (84 d). It also misses the exceptional quality design route (84

e). Where Policy EN17 mentions the reuse route, it adds extra limits that are not in paragraph 84, for example 'similar size and scale' and the same curtilage. It also fails to require the enhancement of the immediate setting, which para 83 c expects. For these reasons, Policy EN17 would be unclear and ineffective in decision-making. It risks refusing schemes that paragraph 84 would support, such as outstanding design or heritage-led cases. To be consistent with paragraph 84 (a to e), Policy EN17 needs to be amended to include a dedicated isolated homes requirement, and the blanket 'similar size and scale' cap should be omitted.

30. Policy EN17 applies to 'Open Countryside' but does not say it excludes Green Belt. If applied inside the Green Belt, it conflicts with Policy EN15's stricter tests on inappropriateness, openness, and very special circumstances. Additionally, Policy EN17 supports rural works' dwellings generally, while EN15 confirms that 'agriculture and forestry' does not include dwellings. Green belt housing would need to fit Policy EN15's exceptions and demonstrate very special circumstances. Therefore, Policy EN17 is not consistent with Policy EN15, and as such is not clear and no effective.

### **12.16 Are the requirements of Policy EN18 clear, effective and consistent with national policy? In particular:**

#### **a) Is the policy supported by robust and up to date evidence to justify the policy?**

31. No, Story Homes do not consider the policy to be justified by robust and up to date evidence.
32. In their Regulation 19 representation, Story Homes argued that the Councils' Open Land Designations Study (prepared by LUC) does not provide sufficient justification to evidence why the Areas of Separation boundaries have been extended. Broughton was given as a key example, where historically, policy focused on protecting land south of Broughton from merging with the Preston Urban Area. Yet the new approach extends the designation all around Broughton without clear justification and without any evidence that development to the north would harm separation. It remains unclear why wider designations are considered necessary.
33. Areas of separation should not be blanket policy approach that sterilises development, as is the case with the Grimsargh and Preston gap, where 'risk of coalescence' does not need to be managed since coalescence has already occurred. There is not a clear sense of separation in this area since the distinction between settlements is undermined by intervening development either side of Longridge Road.
34. Story Homes have also previously highlighted the implications of Policy EN18 for the supply of housing, since it would restrict development in a way which could suppress housing delivery. In order to be consistent with national policy, it was recommended that the policy wording is amended to 'explicitly state that the development restrictions... 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.' This amendment has not been made, and therefore Story Homes maintain their position that Policy EN18 is not consistent with national policy.

Yours sincerely,



**Dan Mitchell**  
**Partner**

Marrons

