

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 14: 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 14 of the Examination of the Central Lancashire Local Plan 2023-2041.
2. We respond to the questions of relevance to Story Homes' Regulation 19 representation (ref: A60), which includes Roger Hannah's viability-related representation on behalf of the consortium of developers, including Story Homes¹.

Matter 14 – Sustainable Travel, Infrastructure and Delivery, and Monitoring (Policies ST1-ST3 and ID1-ID3)

Issue 14 – Does the Plan set out a positively prepared strategy and policies for sustainable travel, infrastructure, delivery and monitoring which is justified, effective and consistent with national policy?

14.3 c) Have the implications of policies ID1 and ID2 in relation to viability been appropriately tested? Are the assumptions in the Local Plan Viability Report (Doc IT05) reasonable and up to date and do they adequately reflect the scale and cost of infrastructure requirements for development in the Borough as set out in the revised Infrastructure Delivery Plan?

3. In their Regulation 19 representation, Story Homes noted that significant viability challenges in respect of housing delivery within Preston City Centre are identified within the Councils' Main Viability Report (Doc IT05). The Viability 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'*.

¹ Ref: A60_Story Homes_Supp 3

4. Story Homes questioned whether the area's full affordable housing needs will be catered for when the policy is predicted on a spatial strategy which directs housing growth to locations where the viable delivery of such homes is challenging. Indeed, the Stantec Housing Supply Report² and Roger Hannah's Viability Study, both prepared for the consortium, identified 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. As such, Story Homes are of the firm opinion that the findings of the Council's Viability Report evidence that the deliverability of planned development to be undermined.
5. Regarding the assumptions of the Viability Report, Roger Hannah's Viability Study 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. This is not regarded as appropriate for Local Plan viability testing, which should include a buffer to ensure that policy provisions will not impact on the deliverability of sites. Roger Hannah's assessment determines 'it is essential that the Local Plan includes provisions for site specific viability testing due to the lack of policy viability shown within the Council's evidence.' Story Homes support this conclusion.

d) Are the policies sufficiently flexible? Do they take appropriate account of development in cases where viability is below that which would be policy compliant?

6. Policies ID1 and ID2 recognise viability and allow obligations by condition or planning obligation and Policy ID2 mentions independent viability review. While this is helpful, the policies still lack explicit flexibility to support house builders when schemes dip below policy compliant viability. For example, there is no stated priority order for obligations when viability is constrained, which can make land pricing and negotiations unpredictable.

14.4 In relation to Appendix 2 is the plan sufficiently clear as to how its implementation will be monitored?

7. The Monitoring Framework is not sufficiently clear on how implementation of its housing policies will be monitored. Housing uses Local Housing Need figures as the target, stating the minimum targets for net additional dwellings per annum in Chorley as 287 dwellings, South Ribble as 450 dwellings and Preston as 500 dwellings. However, housing delivery should be judged against the Local Plan's annual housing requirements, 334 dwellings in Chorley, 460 dwellings in South Ribble and 520 dwellings in Preston, as set out in Policy HS1.
8. Additionally, housing indicators should include reference to the Councils' five-year housing land supply position (5YHLS) as published in each Annual Monitoring Report. Falling below the 5-year requirement should trigger a review of restrictive Green Belt and countryside policies for housing applications, to ensure the delivery of sites in line with housing trajectory. It is not certain how the implementation will be monitored across the Local Planning Authorities. Appendix 2 does not provide sufficient clarity as to whether progress will be monitoring on a collective or individual basis, and what the implications will be for 5YHLS positions.

² Ref: A60_Story Homes_Supp 3

Yours sincerely,



Dan Mitchell
Partner

Marrons

