

EiP Hearing Statement

Central Lancashire Local Plan

Bloor Homes

Representor ID A65

Our ref 64774/03/BOC/MKR
Date 6 November 2025
To Central Lancashire Local Plan Examining Inspectors
From Bloor Homes Limited [ID: A65]

Subject Matter 3 – The Housing Requirement

1.0 Introduction

- 1.1 Lichfields is instructed by Bloor Homes ('Bloor') to make representations on its behalf to the Central Lancashire Local Plan ('CLLP').
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 3 Examination in Public ('EiP') hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following matters:
- Matter 1b – Overarching Matters
 - Matter 2 – Spatial Strategy Policies
 - Matter 5 – Housing Allocations
 - Matter 6 – Housing Land Supply
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the CLLP (Representor ID A65) as well as those made on other Matters listed above. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') (December 2023) and the National Planning Practice Guidance ('PPG').

2.0 Questions

Q3.1: 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?*

2.1 Policy HS1 states that the CLLP will provide for 23,652 net additional dwellings 2023-2041 (1,314 dpa). This is above the previous Standard Methodology figure of 988 dpa and is based on an employment-led scenario (Commuting Ratio 1-to-1) taken from HO9. This modelled a range of scenarios including a preferred scenario based on Cambridge Econometrics’ [CE] employment forecasts for the area, which the CLLP claims ensures that each Central Lancashire authority will provide sufficient growth in its resident workforce so that the total growth in employed people is matched on a one-to-one basis by growth in employed residents.

2.2 The CLLP states that the resultant need from this scenario, at 1,237 dpa, is higher than the Standard Methodology’s 988 dpa minimum starting point, and that the employment-led approach provides the basis of the CLLP housing requirement because it:

- *“Aligns housing need with anticipated job growth.*
- *Reinforces sustainable patterns of commuting.*
- *Reflects market signals and previous rates of delivery.”* [after paragraph 4.15]

2.3 The CLLP then clarifies how the 1,314 dpa housing requirement has been derived:

“Following publication of the revised NPPF in December 2024, the annual housing requirement for Central Lancashire has been increased slightly to 1,314 dpa in order to achieve 80% of the LHN using the new standard method formula, in accordance with the transitional arrangements. The additional 77 dpa has been distributed between the three authorities.” [paragraph 4.19]

2.4 We have fundamental concerns regarding how this new requirement has been identified and whether it is sufficient to adequately address the bulleted considerations set out above.

2.5 Firstly, the main motivation for choosing the figure of 1,314 dpa is simply to meet the 2024 NPPF’s 80% transitional arrangements loophole. This is neither in the spirit of the Governments drive to deliver 1.5 million new homes; nor can we see anywhere in the previous version of the PPG where this fulfils the necessary ‘exceptional circumstances’ case justifying a departure from the standard methodology.

- 2.6 Secondly, 1,314 dpa results in a misalignment between jobs and workers. A detailed analysis of this is set out in Bloor’s response to Policy HS1 (see our Soundness Representations¹), but in summary:
- It is underpinned by HO9’s modelling of a range of employment scenarios including an ‘Employment-led’ projection. This was based on using economic activity rates data from the 2021 Census alongside jobs growth forecasting data from CE and a 1:1 commuting ratio. This totals **894 jobs per annum** (16,098 total) over the period 2023-2041, and **1,237 dpa**.
 - The jobs growth figure was then modelled in ERO6a. This provides a revised and updated Objectively Assessed Needs [OAN] exercise to reflect a different forecast period for the emerging CLLP, 2023-2041, changing macro-economic conditions, updated forecast methodologies and the latest population projections for Central Lancashire. ERO6a ran three forecasting models: Historic Land Take-Up; Labour Demand; and Labour Supply. The latter scenario aligns with the LHN of 1,237 dpa in HO9.
 - ERO6a concludes that Central Lancashire’s employment land OAN is **172.87 ha**, split 18.24 ha for office (based on the Labour Demand scenario) with the remaining 154.63 ha for industrial / warehousing uses (based on the past take up modelling). This 173 ha figure is taken forward in Policy EC1 of the CLLP to support employment needs.
 - CLLP’s housing and employment policies are therefore fundamentally misaligned. The 1,314 dpa requirement is underpinned by DLP’s figure of 1,237 dpa, generated by the CE employment forecasts, then uplifted slightly to meet 80% of the new SM3 housing target. Policy EC1: *Scale of Economic Growth* identifies a requirement of 173 ha of employment land, based on BE Group’s evidence. **Crucially, this figure is only aligned with the CE forecasts for the office needs; for B2/B8 requirements BE Group used past take up rates.**
 - The 173 ha employment land target does not therefore align with the labour supply projection. If all 173 ha comes forward for development by 2041 it will undoubtedly accommodate far higher levels of employment than could be sustained by 1,314 dpa.
- 2.7 The data is summarised in Table 2.1, which compares BE Group’s employment land modelling scenarios². The housing evidence of 1,237 dpa is based on a net job growth of 16,098 (894 p.a.), which equates to the Labour Supply employment land scenario of 93.17 ha. However, the Council’s employment land requirement is 173 ha, 87% higher:

¹ Lichfields (April 2025): *Central Lancashire Local Plan Publication Version Soundness Representations*, pages 11-16 [Comment ID: A65]

² Based on data within ERO6a, we understand that their adjustments for vacancy and a margin of choice amounted to an uplift to the base B2/B8 figures of 15.36ha for Chorley; 23.63ha for Preston, and 23.94ha for South Ribble. For office uses, the same upward adjustments from the base figures are 1.38ha for Chorley, 1.2ha for Preston, and 1.16ha for South Ribble. We understand that they have been applied on a consistent basis to all three scenarios.

Table 2.1 Comparison of Employment Land Scenarios (ha)

Use	LA Area	Past Take Up	CE Labour Demand	Labour Supply (Employment led CR 1-1)
Total Jobs	Central Lancs	Unspecified	16,660 (926 p.a.)	16,098 (894 p.a.)
Office	Chorley	-2.38	6.48	5.98
	Preston	3.99	6.00	4.80
	South Ribble	8.83	5.76	4.16
	Central Lancs	10.44	18.24	14.94
Industrial / Warehouse	Chorley	34.97	14.76	19.86
	Preston	68.43	22.53	26.93
	South Ribble	51.23	21.14	31.44
	Central Lancs	154.63	58.43	78.23

Source: BE Group (February 2025): Central Lancashire Employment Land Study and OAN Update 2024 [ER06a], Tables 21, 22, 24 and 25. Cells in **Green** identify the scenarios that have been taken forward in the CLLP

- 2.8 **Therefore, the Councils’ own evidence suggests that they are planning for a level of employment land growth, at 173 ha, that is 80 ha above the level that could be justified under its Labour Supply scenario of 93.17 ha** (which underpins its housing target).
- 2.9 BE Group’s ERO6a did not model the job growth implications of delivering 173 ha, but we can be sure that providing at least 80 ha of office, industrial and warehousing land above the level justified by its housing OAN of 1,237 dpa, would have a very significant impact on net job creation.
- 2.10 **To address this misalignment, the Councils should plan for a much higher level of housing growth that is more closely aligned with past trend job growth and their employment land ambitions.** There remains a clear disconnect between the employment land evidence and housing evidence which could lead to unsustainable outcomes including increased in-commuting and an exacerbation of the issues being experienced in the housing market.
- 2.11 It is also clear that despite the CLLP suggesting that the basis of its housing requirement reflects market signals and previous rates of housing delivery [paragraph 4.15, bullet 3], this is not the case. Over the past decade, Central Lancashire has delivered 1,650 dpa, rising to 1,920 dpa on average over the past 5-years (to 2023/24)³.
- 2.12 These figures are significantly higher than the housing target in the CLLP; furthermore, the latest housing delivery figure for the three districts in 2023/24 is recorded by MHCLG at 2,500 dwellings net (up from 2,418 dwellings the year previously), which is 90% higher than the proposed housing target. This suggests that the three Central Lancashire authorities are planning for a very substantial reduction in housing delivery than current trends would suggest is justified.
- 2.13 Finally, we are concerned about the robustness of the assumption in HO9 indicating that Edge Analytics reduced the level of vacancy between 2021 and 2031, fixing it thereafter (see Appendix 1, paragraph 2.32).

³ Based on data contained within MHCLG Live Table 122

2.14 There is no justification for this elsewhere in the report or the CLLP, but it nevertheless has the effect of reducing the number of new dwellings required as vacant homes are brought back into productive use. Our own analysis of the impact of this adjustment is set out on page 18 of our Reg.19 representations. The adjustment reduces the level of housing need by **1,386 dwellings overall** (and 944 dwellings in Preston alone) compared to if vacancy rates been held constant over time.

Q3.2: 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?

2.15 This is unclear and unsubstantiated.

2.16 The supporting text to Policy HS1 states that a redistribution of the three identified housing requirements has been applied in Policy HS1 to “*reflect the spatial strategy drivers identified above to promote housing and related growth in the most sustainable locations and to enable existing commitments to come forward*”. It has the effect of reducing Chorley’s SM3 need from 410 dpa to just 334 dpa (an 18.5% reduction), whilst increasing Preston’s housing target from 441 dpa to 520 dpa, and South Ribble’s from 386 dpa to 460 dpa.

Table 2.2 Dwellings per Year – Comparison of Scenarios

	Chorley	Preston	South Ribble	TOTAL
SM3 (as of Oct 2025)	557	632	498	1,687
Employment led	479	378	417	1,274
Employment-led (CR 1-1)	410	441	386	1,237
CLLP Policy HS1 distribution	334	520	460	1,314

Source: DLP (2024): *Central Lancashire Housing Study Update* Table 16 [HP09] / Draft CLLP (February 2025)

2.17 As can be seen in Table 2.2, this risks increasing commuting from Preston and South Ribble into Chorley to take up work opportunities as the local labour force is artificially constrained.

2.18 Bloor strongly disputes that this is an appropriate approach to take. Chorley is already the most expensive part of Central Lancashire, with median house prices at £215,000 compared to £200,000 in South Ribble and as low as £135,000 in Preston. Median wages in Chorley (£35,218) are slightly higher than Preston’s (£34,366) and well below those of South Ribble (£37,086), meaning that the affordability ratio in Chorley is comfortably the highest in the sub-region at 6.63 compared to 5.99 in South Ribble and 5.88 in Preston⁴. The inevitable outcome of suppressing housing targets in the most desirable residential area of Central Lancashire whilst also backloading its delivery will inevitably lead to higher house prices in Chorley, worsening affordability still further.

2.19 The CLLP states that one of the motivations for increasing the housing target from 988 dpa was because using the Standard Method figure had the potential “*to make travel patterns*

⁴ ONS (2025): Median house price / Median Wages / Median Affordability Ratios by local authority district, England and Wales, year ending September 1997 to year ending September 2024 (£)

in Central Lancashire less sustainable by increasing inter-district commuting [paragraph 4.14]. As such, the 1,237 dpa figure is based on an equalisation of commuting patterns. This has the effect of reducing the number of homes required across Central Lancashire as a whole, from 1,275 dpa to 1,237 dpa (see Table 15 of the Housing Study Update). It also radically rebalances the distribution of housing need away from Chorley and South Ribble, towards Preston.

- 2.20 There are a number of problems with this approach. Firstly, by artificially reducing the housing target from 1,275 dpa to 1,237 dpa by balancing commuting, whilst relying on an employment land target that is far in excess of the level justified by either the labour demand or labour supply modelling, then the perverse result of actually increasing net in commuting will occur. Fewer households will be able to live in the three districts and will have to commute in from outside the HMA, a less sustainable outcome.
- 2.21 Secondly, it is beyond the gift of the three Councils to ensure that *“for every new job created in each district there is a resident worker available to fill it”* – the Councils cannot control who moves into the new homes. It is usually accepted that demographic modelling should seek to replicate existing commuting patterns rather than attempt to artificially distort the modelling to suppress housing need.
- 2.22 Thirdly, the Councils’ preferred outcome, of shifting housing need to Preston and to a lesser extent South Ribble at the expense of Chorley, could result in less sustainable commuting patterns than currently.
- 2.23 Fourthly, the proposed distribution of housing across the three districts in the CLLP suggests that people are willing to move significant distances to find a suitable home to live and ignores the reality that many people want to stay in areas they are familiar with, around friends and family and where their children go to school. National research⁵ provides an indication of the average distance moved between a head of housing’s present and previous residential address, and for market housing, 17% of households move less than a mile to their new residence, whilst 70% move less than 10 miles.
- 2.24 Tenants living in social housing generally move even shorter distances; 20% move less than a mile, whilst 83% move less than 10 miles. As a result, new housing supply should be provided as near as possible to where the need is likely to arise. With a 13-mile driving distance between Chorley and Preston, it is not clear that moving Chorley’s housing need to Preston is appropriate and that it will ensure housing needs across the whole of Central Lancashire will be met. Furthermore (and according to the 2011 Census, the 2021 version being unreliable due to the pandemic), Chorley has similar migration movement patterns between Preston, Bolton and Wigan with an average of 6% of moves between Chorley and these three areas. Therefore, it is not clear why Chorley and Preston’s relationship is considered the strongest above that of other local authorities that show similar migration patterns.

⁵ Source: DLUHC (2022) *English Housing Survey- Tenure by Distance moved, 2021/22*

2.25 Finally, the decision to backload housing need to the later years of the plan period in Chorley is flawed – it is the antithesis of positive plan preparation and suppresses the supply of housing land. Furthermore, by backloading the housing requirement, it is likely that the future uplift will never materialise because the next plan will require alignment with SM3 which will enforce a higher housing requirement, and Chorley will not electively seek to uplift their future requirement to address previous under delivery.

Q3.3: 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?

2.26 No. There are clear inconsistencies with the approaches taken across the three Local Authority areas, which means that the preferred scenarios taken forward in the CLLP are not robust.

2.27 In particular:

- Chorley’s 162 dpa net affordable housing need is based on clearing the backlog over a 10-year period and including no newbuilds in the affordable housing supply.
- Preston’s 130 dpa net affordable housing need is also based on clearing the backlog over a 10-year period, but includes 295 newbuilds in the affordable housing supply.
- South Ribble’s 146 dpa net affordable housing need is based on clearing the backlog over a 5-year period, and includes 84 newbuilds in the affordable housing supply.

2.28 A detailed comparison of the annual affordable housing need approaches for the affordable housing need in the CCLP is provided in our Representations⁶. We note that as a worst-case scenario, with all three areas aiming to clear the backlog over a 5-year period and including no newbuilds in the affordable housing supply, the overall need would increase from 438 dpa to as much as **1,618 dpa** (412 dpa in Chorley, 976 dpa in Preston and 230 dpa in South Ribble).

2.29 Aside from the obvious inconsistencies in approach, it is difficult to understand why the net affordable housing annual need figures have fallen so significantly for Central Lancashire when compared with the data contained within the HDNAs just two years previously, which were undertaken by the same consultant (arc4) using broadly the same data sources.

2.30 As can be seen in Table 2.3, in the 2022 round of HDNAs, arc4 calculated that the overall Central Lancashire affordable housing net annual need was 831 dpa, 393 dpa higher than the 2024 versions. The 2022 HDNAs used a 5-year backlog clearance for two of the three authorities.

⁶ Lichfields (April 2025): *Central Lancashire Local Plan Publication Version Soundness Representations*, pages 34-38 [Comment ID: A65]

Table 2.3 Comparison of annual affordable housing need resulting in the preferred scenario in the CCLP

	Chorley	Preston	South Ribble	TOTAL
2022 HDNA	113 (5 yrs backlog clearance including newbuild)	395 (10 yrs backlog clearance including newbuild)	323 (5 yrs backlog clearance including newbuild)	831
2024 HDNAs – CCLP HS7 preferred scenario	162 (10 yrs backlog clearance excluding newbuild)	130 (10 yrs backlog clearance including newbuild)	146 (5 yrs backlog clearance including newbuild)	438
Difference	+49	-265	-177	-393

Source: Arc4 (2024): Chorley Borough LHNA / Preston Borough LHNA / South Ribble Borough LHNA / Lichfields' analysis

2.31 Furthermore, we are concerned that for its principal scenarios (in H10, H11 and H12) **arc4 has erroneously included the current committed supply of affordable housing units on an annual basis, whereas they should have been netted off the current backlog need or excluded entirely.** arc4 made the same error in its 2021 SHMA Update for Wirral Borough Council. This was strongly criticised by the presiding Inspectors at the subsequent Local Plan Examination⁷.

2.32 What this means in basic terms:

- For **Preston**, arc4 took the current pipeline of 1,473 affordable dwellings, assumed that it would all be built over 5 years, and came to a figure of 295. However, this 295 dpa figure was then used in the supply calculation as a “*proxy for committed supply*” in perpetuity, which, as the Wirral Inspectors noted, conflates supply with need. Whilst arc4 also goes on to model two variants which exclude newbuild commitments (and which increase the affordable housing need to between 425 dpa and 976 dpa depending on whether a 5-year or 10-year backlog clearance is used), the CLLP (paragraph 4.58) uses the flawed Principal Scenario of 130 affordable dpa with newbuild commitments included.
- The same error is seen in the **South Ribble** HDNA, where “*an annual average of 84 affordable dwellings have been built in South Ribble 2021/22 to 2023/24*” [Table C6] is included in perpetuity in the supply. Again, variants are modelled by arc4 in the HDNA, with the comparable scenario excluding newbuild commitments increasing the overall affordable housing need from 146 dpa to 230 dpa. The CLLP (paragraph 4.59) again chooses to go with the lower figure of 146 dpa.
- Whilst an annual committed supply of 109 affordable dwellings was also erroneously included in the **Chorley** HDNA, this element was excluded in the ‘Variant 2’ scenario calculation, and in this case the CLLP prefers to use the Variant figure of 162 dpa rather than the Principal scenario in the CLLP. No explanation is given in the CLLP for this, which again demonstrates the **inconsistent approach** taken by the three Councils in picking and choosing different scenarios and components to generate affordable housing need in their areas.

⁷ Inspectors’ Report on the Examination of the Wirral Local Plan (13th March 2025), paragraphs 101 and 102

2.33 **Being consistent across all three districts and excluding newbuild commitments (as in the case of Chorley) would increase Central Lancashire’s affordable housing need in the CLLP from 438 dpa to 817 dpa. This is 62% of the total 1,314 dpa LHN and undeliverable without a substantial increase to the overall housing requirement.**

Q3.4: 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?

2.34 No, it does not. The employment land forecasts in ERO6a (which link back to the housing requirement in the CLLP) are simply based on localised employment land needs with no consideration of strategic requirements. As BE Group says when discussing the formulation of its Labour Supply calculation:

*“The methods discussed above are ‘Policy Off’ in that they **make no allowance for any major public sector programmes which might generate jobs above the baseline...** While there are other strategic projects proposed in Central Lancashire, at this time, most notably the development of the National Cyber Security Centre at Samlesbury, there are no clear forecasts of the jobs growth resulting from these schemes which could inform a Policy On forecast. For this reason, **a Policy On Scenario, relating to any active local programme is not undertaken here.**” [ERO6a paragraph 3.8]*

Q3.5: Does the figure take adequate account of the needs of elderly residents and specialist housing?

2.35 No adjustment is made to account for meeting the needs of ether elderly residents or those requiring specialist housing. The household projections incorporated into the 1,314 dpa housing requirement explicitly excludes the population living in communal establishments (e.g. care homes and other C2 uses) from the calculation.

2.36 H10, H11 and H12 identify high levels of need for older persons accommodation (with Chorley alone needing as many as 3,405 additional units of accommodation for older people by 2041 including 2,648 C3 dwellings (sheltered/ leasehold retirement dwellings); 655 C2 Extra Care dwellings; and 103 C2 residential care bedspaces).

2.37 This is acknowledged in the CLLP which states that *“It is recognised in the HNDAs that Central Lancashire has an aging population which has resulted in an increased need for specialist housing for older people”* [paragraph 4.93].

2.38 However, no specific adjustment to the CLLP dwelling requirement has been made to address the issue. This is despite a recommendation by DLP in HO9 to consider their needs when determining the housing need for each area:

“It is recommended that an updated assessment of the size, type, and tenure of housing needed for different groups in Central Lancashire is considered as part of this process and used to inform policy-based decisions about the amount of housing to be planned for in each district.” [paragraphs 0.26 and 0.27]

2.39 No quantitative provision is made in the CLLP to meet any of the C2 needs, which would need to be in addition to the LHN.