

Matter 3 The Housing Requirement

For ID: Persimmon Homes A17 and Wain Homes A68 | 23-106

In relation to:- Central Lancashire Local Plan Examination



Project: 23-106
Hearing: Central Lancashire Local Plan
Client: ID: Persimmon Homes A17 and Wain Homes A68
Date: November 2025
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1. Matter 3 – The Housing Requirement

1.1 This Hearing Statement sets out the response of Persimmon Homes and Charles Church Lancashire and Wain Homes North West to Matter 3 - The Housing Requirement. We still rely on our submissions as well as those by Stantec on behalf of the Consortium, which our clients are part of. We set out our response to our overarching concern on soundness in answer to Q3.1 below.

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?

1.2 The Standard Method sets out a need for 1,643 dwellings per annum. The Plan has been submitted on the basis of meeting 80% of the standard method which is 1,314 dwellings.

1.3 The Central Lancashire Housing Study Update (HO9) is dated December 2024 and recommended an employment-led requirement of 1,237 dwellings. However, due to the exclusion of the press and public it is not known what the Joint Committee considered. However, public reports were taken to the Full Councils of the three authorities in late January 2025. These had the uplift of 77 dwellings in Policy HS1.

1.4 It is therefore not on the public record of when it was agreed that the additional 77 homes would be applied but we consider it was after the publication of the Framework when the transitional arrangements were set out. This reinforces our concerns that the requirement in HS1 is arbitrary to avoid addressing paragraph 237.

1.5 The implications of the transitional arrangements are a fundamental part of the reason why the Plan is unsound as it is failing to plan for the remaining 20% of the standard method that the authorities should have looked to meet by going back to Regulation 18 as set out in paragraph 237. That 20% equates to



some 5,000 homes over the plan period. The implication is that there are 5,000 households in housing need that the plan making system is failing to meet and is not boosting supply in Central Lancashire.

- 1.6 Therefore, our answer to Q3.1 is no, the housing requirement is not soundly based and fails to meet criteria (a) to (d) of paragraph 36 of the Framework. Indeed Q3.1 demonstrates why it is not soundly based as an arbitrary increase to meet the transitional arrangements is not one of the criteria listed. These criteria are taken from paragraph 2a-010 of the PPG which do not list such a circumstance. In short, the increase is not evidence based and is simply a mathematical calculation to meet the transitional arrangements and does not fall within the scope of the circumstances set out in the PPG. For that reason the plan is not sound and therefore cannot be considered under the 2023 Framework.



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