



Central Lancashire Local Plan Examination

Matter 3 Hearing Statement

November 2025



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MATTER 3 – THE HOUSING REQUIREMENT

Issue3 – Is the identified housing requirement justified and consistent with national policy?

3.1 - 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?*

1.1.1 Further to our representations to the Regulation 19 consultation, Gladman maintain that the housing requirement included at policy HS1 is not justified by the Council's evidence and is therefore not soundly based.

1.1.2 The Central Lancashire Local Plan (CLLP) is proposed to fall under the transitional arrangements at paragraph 234(a) of the NPPF24. The CLLP will therefore be examined under the December 2023 version of the NPPF (NPPF23). Paragraph 61 of the NPPF23 Framework states:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to

the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”

- 1.1.3 An updated assessment of local housing need was published in December in 2024, titled: ‘The Central Lancashire Housing Study Update’ (HO09). Paragraph 5.27 of the Housing Study Update confirms that reliance on the December 2024 Standard Method has the potential to make travel patterns less sustainable by increasing inter-district commuting. In any event, as shown in Table 1 below, a housing requirement based on the December 2023 Standard Method would equate to only 58% of the December 2024 Standard Method, which has since increased owing to the new dwelling stock data (released March 2025) and the new affordability data (released May 2025).

	Chorley		Preston		South Ribble		Central Lancashire	
	Dpa	Total	Dpa	Total	Dpa	Total	Dpa	Total
Standard Method (NPPF 2023)	506	9,108	269	4,842	169	3,042	944	16,992
Standard Method (December 2024)	564	10,152	590	10,620	489	8,802	1,643	29,574
Standard Method (May 2025)	557	10,026	632	11,376	498	8,964	1,687	30,366

Table 1: Comparison of Standard Method figures

- 1.1.4 Table 3 of the Housing Study Update provides individual and aggregate dwelling completion rates since 2013. It demonstrates that aggregate delivery exceeded the proposed 1,314 dpa housing requirement in nine out of eleven of the past monitoring years. Table 4 of the Study Update demonstrates an average 10-year housing delivery of 1,650, and an average 5-year housing delivery of 1,920 across the plan area; both figures exceed the December 2024 Standard Method figure. The Housing Study

Update goes on to consider a range of demographic scenarios to determine an alternative approach to assessing housing need. Paragraph 4.15 of the CLLP concludes:

*The CLLP housing requirement is based on an employment-led scenario (Commuting Ratio 1 to-1). This uses the most recent Cambridge Econometrics employment level forecasts for Central Lancashire and applies Economic Activity Rates based on the 2021 Census. This scenario 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 workers resident in each authority area. The resultant need from this employment led scenario (**1,237 per annum**) is higher than the Local Housing Need (LHN) figure (calculated using the previous standard method formula) which provides a minimum starting point. 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.*

1.1.5 The chosen employment-led scenario uplift to the December 2023 Standard Method baseline scenario of 944 is also less than the 80% threshold required to accord with paragraph 234(a) of NPPF24 (76%). Accordingly, paragraph 4.19 of the CLLP states:

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

- 1.1.6 Gladman's representations to the Regulation 19 consultation highlighted the absence of any evidence to justify this uplift other than to meet the requirements of NPPF24 paragraph 234(a). No further evidence to justify this approach has since been published to address this oversight.
- 1.1.7 Gladman do not consider that the transitional arrangements for plan making in NPPF24 were included to envisage that an authority would deliberately change the requirement to be exactly at 80% of the December Standard Method figure (1,643). Accordingly, Gladman contend that the chosen approach is based primarily on the avoidance of having to deliver the December 2024 Standard Method figure as a minimum, and to plan for a quantum of homes that is significantly below recent delivery rates for the plan area. The evidence base does not support the chosen approach and therefore, Gladman consider that the transitional arrangements have not been met nor that the proposed housing requirement is justified by the Council's evidence.
- 1.1.8 Furthermore, as mentioned above, with the context of the transitional arrangements, footnote 83 of the NPPF states that housing requirement should be calculated using the standard method in PPG, published on 12 December 2024. The PPG requires the LHN requirement is updated using regular evidence. The current LHN for Central Lancashire defined by the Standard Method has increased since the publication of the December 2024 figure. Against the current Standard Method figure released in May 2025, the housing requirement included at policy HS1 represents only 77.8% of the current combined Standard Method figure (1.687). On this basis, the CLLP would be subject to the provisions of paragraph 78(c) of NPPF24. This requires all constituent authorities to apply a buffer of 20% to their housing requirement from July 2026 for housing land supply purposes. This further highlights the plan's short-sighted approach to delivering LHN in an attempt to progress under the provisions of NPPF24 paragraph 234(a), rather than delivering a robust plan which delivers up to date and meaningful housing needs.
- 1.1.9 With regards to the proposed housing requirement's alignment to jobs and growth, and the assumptions arising from planned economic growth, the December 2024

Government publication, titled: 'Plan for Change, Milestones for Mission-Led Government', confirms the key role of planning reform in unlocking investment and achieving their number one mission of economic growth. The Government emphasise the need for strategically joined up decisions on housing, business growth and infrastructure at both a national and local level accordingly.

- 1.1.10 Regionally, The Lancashire Combined County Authority (CCA) published the Lancashire Growth Plan (2025-2035) (LGP) in September 2025; post-submission of the CLLP. The LGP stresses the importance of aligning housing delivery with the region's industrial and economic strategies to attract investment and talent and to support a skilled workforce. It also includes a pipeline of major investment projects including the Samlesbury Enterprise Zone and Innovation Hubs, which will form the National Cyber Force headquarters. This significant investment project supports the Government's 'Invest 2035' strategy regarding the prioritisation of growth sectors including defence, and digital technologies, and is expected to create over 3,000 additional jobs in the area.
- 1.1.11 The LGP also focuses on enhancing economic connectivity through main economic corridors including the M55–M65 growth corridor encompassing major existing and planned employment zones and innovation assets between Blackpool and Burnley, as well as and North-South Cyber Corridor, which links Lancaster, the Samlesbury Enterprise Zone, and Manchester.
- 1.1.12 The settlements within Central Lancashire area are strategically well-placed to benefit from and contribute towards these transformational growth projects, with Preston particularly well-placed to compliment the Samlesbury Enterprise Zone through Preston station Quarter Strategic Regeneration Area.
- 1.1.13 The success of the region's industrial and economic strategy is therefore reliant on the CLLP planning for a housing requirement that provides enough homes for the supporting workforce generated by these strategic investment projects. The proposed housing requirement currently fails to provide clear evidence that it supports the region's economic ambitions and Gladman suggest that a further

housing study update is prepared to account for the planned growth outlined in the recently published LGP.

- 1.1.14 In summary, whilst the housing requirement included at policy HS1 exceeds the December 2023 Standard Method figure, its evidence base is flawed and it does not meet the NPPF23 requirement for plans to be prepared positively in a way that is aspirational in respect of assisting in delivering wider economic growth aspirations, nor does it meet the objective of significantly boosting the supply of housing.

3.2 - 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?

- 1.1.15 Table 2 below provides a comparative breakdown of the spatial distribution of the housing requirement based on the figure included at policy HS1, the Central Lancashire Housing Study, and the December 2024 and May 2025 Standard Method figures. It shows that the housing requirement figure for each of the three authorities are below the December 2024 and May 2025 Standard Method figures.

	Chorley	Preston	South Ribble
HS1 Requirement	334	520	450
Central Lancashire Housing Study	410	441	386
Standard Method (December 2024)	564	590	489
Standard Method (May 2025)	557	632	498

Table 2: Comparison of HS1 and baseline housing requirement figure with Standard Method.

- 1.1.16 Table 4 in the Housing Topic Paper (TP02), as extracted below, demonstrates how the the Central Lancashire Authorities seek to apply the uplift of 77 dpa to the 1,237 dpa requirement identified within the Housing Study Update to ensure the emerging CLLP meets 80 per cent of the December 2024 standard method LHN requirement (of 1,643

dwellings). Confusingly, the second column states that the redistribution of housing is based on the Central Lancashire Housing Study, whereas the explanation for the re-distribution of housing need is set out in the Housing Topic Paper.

Table 4: Redistribution of need to meet the Transitional Arrangements

	Proposed redistributed housing need based on Central Lancashire Housing Study requirement	Increase applied to meet transitional arrangements following introduction of new Standard method	New Proposed redistributed housing need	New Standard Method standalone requirement
South Ribble	450	10	460	489
Preston	500	20	520	590
Chorley	287	47	334	564
Total	1,237	77	1,314	1,643

Source: TP01 Housing Topic paper – Approach to housing need and redistribution.

- 1.1.17 The Housing Topic paper provides no evidence to justify the re-distribution of need other than to meet the minimum requirements of the provisions included at paragraph 234(a) of NPPF24. As mentioned in relation to question 3.1, this approach is contrived to benefit from a transitional arrangement and is not evidence based or justified in a plan making sense.

3.3 - 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?

- 1.1.18 No comment at this time other than to reiterate the point made that the CLLP should plan to deliver the current Standard Method figure and that the newly arising need of this figure over the plan period should be included within the gross affordable need across the plan area.

3.4 - 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?

- 1.1.19 Please see our response to Question 3.1 above.

3.5 - Does the figure take adequate account of the needs of elderly residents and specialist housing?

1.1.20 No comment at this time.

3.6 - Should there be a housing requirement for designated neighbourhood areas identified within the Plan (paragraph 66 in the NPPF Dec 2023)? If so, what should this be?

1.1.21 No comment at this time.