

# Central Lancashire Local Plan Examination

## Matters, Issues and Questions

### Matter 6 - Housing Land Supply

(Policy HS1 and Appendix 3 - Housing Trajectories)

**Issue 6 - Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and align with national policy?**

**Note: This Matter focusses on the overall supply of land for housing. The merits of individual site allocations are considered under Matters 4 and 5, although our consideration of this issue will also be informed by detailed discussion of the deliverability of the specific site allocations in Matters 4 and 5.**

**In the light of Matter 3, we will reach a conclusion on whether or not the objectively assessed need for housing of 23,652 dwellings for the 2023-2041 period is justified. However, without prejudice to that, these questions work on the assumption that 23,652 dwellings is a soundly based housing requirement figure.**

**6.1 Are the assumptions that have been made to inform the trajectory justified in relation to the delivery of housing sites, in particular in relation to:**

**a) lead in times for grant of full permissions, outline and reserved matters and conditions discharge?**

See response to question 2b) below, which provides an answer to both questions 2a) and 2b).

**b) site opening up and preparation, and dwelling build out rates?**

The CLAs provided a response to the Inspectors' Initial Questions dated 18/09/25 ([CLA03](#)) regarding delivery assumptions (question 4). The CLAs confirmed that for the majority of sites, information on lead in times and build out rates was obtained from the site promoter. Prior to the Regulation 19 consultation, a site promoter survey was carried out in August 2024 to seek information from site promoters regarding timescales for development, expected build out rates and if a planning application had

not yet been submitted, what site assessment works had been undertaken. This information was used to inform the trajectories in the Regulation 19 CLLP.

Since submission of the CLLP, each CLA has undertaken housing land monitoring for the 2024/25 period, as well as five-year housing land supply assessments covering the period 1<sup>st</sup> April 2025 to 31<sup>st</sup> March 2030. Given more up to date data is available and the housing completions for 2024/25 are now known, each CLA has prepared an updated housing trajectory with a base date of 1<sup>st</sup> April 2025. These are set out at the end of this document. These updated trajectories informed the land supply data requested by the Inspectors (HO18a-HO18f). They supersede the trajectories included in the submission CLLP, which had a base date of 1<sup>st</sup> April 2024. As part of the housing land monitoring and five-year supply work, applicants were contacted regarding timescales for bringing their sites forward and expected build out rates.

In addition, all site promoters for housing and mixed-use allocations that do not yet have planning permission were contacted to seek updated information on delivery timescales and build out rates. This information was used in the update to the housing trajectories.

As set out in the CLAs response to the Inspectors Initial Questions dated 18/09/25 ([CLA03](#)), where no information was received from site promoters regarding development timescales and build out rates, the data in the Housing Trajectory Assumptions paper ([MO08](#)) was used as a starting point to determine appropriate assumptions. Site specific considerations were also taken into account when determining the assumptions to be applied to each site, for example whether there are any constraints that may result in longer development timescales or lower build out rates. Recent completions rates on nearby sites or on other sites being developed by the same developer were also considered.

The delivery assumptions for large sites (50+ dwellings) in the paper are based on information contained in the 'Start to Finish' report updated and re-published by Lichfields in September 2024. This document is considered to provide robust information on average development lead in times and build out rates for large sites as it is based on detailed analysis of a large number of housing developments across the country. It is widely used by Councils to inform housing trajectories. The findings broadly align with lead in times and build out rates on recent developments in Central Lancashire but are based on an assessment of a much larger number of sites, therefore they are considered more robust and comprehensive.

The delivery assumptions for sites of less than 50 dwellings in the trajectory are based on recent development timescales and build out rates in Central Lancashire as the Lichfields paper does not include an assessment of developments of less than 50 dwellings.

**6.2 Is there a reasonable prospect that a total of 6,499 new dwellings will be provided by 31/03/41 on sites that had planning permission at 01/04/24?**

The CLAs have prepared updated housing trajectories with a base date of 1<sup>st</sup> April 2025. The updated Central Lancashire housing trajectory identifies that a total of 7,288 dwellings on sites that had planning permission on 31<sup>st</sup> March 2025 will be provided between 1<sup>st</sup> April 2025 and 31<sup>st</sup> March 2041 across Central Lancashire.

The CLAs consider there is a reasonable prospect that all of these dwellings will be developed within the plan period.

The deliverability and developability of each site with planning permission has been assessed to determine whether there is a reasonable prospect that the site will be developed in the plan period. Part of this assessment included engagement with applicants and developers regarding the projected completions and delivery timescales of these sites both as part of the CLLP process and through five-year housing land supply work.

**6.3 Is there a reasonable prospect that the total of 13,440 new dwellings to be delivered through local plan allocations will be provided by 31/03/41?**

The updated Central Lancashire housing trajectory identifies that a total of 12,213 dwellings will be provided on CLLP allocations between 1<sup>st</sup> April 2025 and 31<sup>st</sup> March 2041 across Central Lancashire.

The CLAs consider there is a reasonable prospect that all the sites proposed for allocation will be delivered in line with the trajectories. The majority of allocations will be fully completed within the plan period, however a small number of the allocations are expected not to be fully built out by 31<sup>st</sup> March 2041. Only the dwellings expected to be completed in the plan period on these sites are included in the trajectory.

Each of these sites has been assessed in detail through the SHELAA process and they are all considered to be suitable, available, and achievable. The development timescales and build out rates applied to the allocations are based upon information provided by site promoters for most sites. For other sites assumptions have been

applied as set out in the response to matter 6.1. All sites are considered to be deliverable.

**6.4 Is there compelling evidence to justify a windfall allowance of 3,139 new dwellings over the plan period and to demonstrate that they will provide a reliable source of supply?**

Chapter 4 of the SHELAA ([HO14a](#)) sets out the evidence to justify the inclusion of the windfall allowance over the plan period. The windfall allowance for both Chorley and South Ribble is based on historic windfall delivery rates and expected future trends, as required by paragraph 72 of the NPPF (2023).

The historic windfall delivery rates identified are over a 14-year period, and the data shows that they made a steady and important contribution to housing supply in the boroughs during that period. This data is therefore considered to provide a robust basis for estimating future windfall developments.

The total windfall allowance included in the updated Central Lancashire housing trajectory is 2,874 dwellings. The reasons for the windfall allowance changing from that included in the housing trajectory in the Submission CLLP are set out below.

Chorley's Windfall Allowance

In the updated housing trajectory for Chorley, the windfall allowance is based on the one identified in the SHELAA, which was used to inform the trajectory in the submission CLLP. The only difference is that the introduction of both the small and large windfall allowance has been moved on a year as the base date of the trajectory is now 1<sup>st</sup> April 2025 rather than 1<sup>st</sup> April 2024.

The small windfall allowance is included in the trajectory from the year 2028/29 rather than the year 2027/28. This is three years from the base date of the latest housing supply calculation (1<sup>st</sup> April 2025), as prior to this date many of the likely completions on small windfall sites are already known through existing planning permissions that have not yet been built.

The large windfall allowance is included from year 2030/31 rather than 2029/30. This is 5 years from the base date of the latest housing supply calculation (1<sup>st</sup> April 2025). This is because, prior to this date, many of the likely completions on large windfall sites will already be known through existing planning permissions that have not yet been built. These are already included in the overall Local Plan supply calculations. Large windfall

sites take longer to come forward than small windfall sites as they may involve outline planning permissions and subsequent reserved matters approvals, and because they comprise of a greater number of dwellings.

For years 5 to 10 of the plan period from anticipated adoption, the large windfall allowance has been discounted by 50% to reflect the fact that the Council will have considered and identified many opportunities for development of large sites during this time through the four call for sites exercises undertaken and the identification of other potential sites through the plan making process.

For the last five years of the plan period the full large windfall allowance has been applied as there is a reasonable prospect that new large windfall sites will continue to come forward.

The total windfall allowance included for Chorley is 1,390 dwellings.

This approach is consistent with the approach taken by other local authorities that were found sound at examination, including Maidstone Borough Council.

#### South Ribble's Windfall Allowance

The housing trajectory in the submission version CLLP sets out a stepped windfall supply, with 83 completions forecast for 2027/28 and 2028/29, 112 completions from 2029/30 to 2035/36, and 140 completions from 2036/37 to 2040/41. This gave a total figure for the plan period of 1,650 units.

These figures derive from the figures published in the SHELAA ([HO14a](#)). This drew from historic analysis of windfall delivery on small and large sites to give a total annual forecast figure and was proposed through the SHELAA consistent with the methodology for Chorley.

However, in the South Ribble Housing Land Position Statement (HLPS) 2025 ([MO05](#)) the windfall figures have been revised to set out a stepped windfall supply of 60 completions in 2027/28, 80 completions in 2028/29, and 112 completions from 2029/30 onwards. This gives a total figure for the plan period of 1,484 units.

The differences are explained by the following:

- Analysis of the total number of windfall completions over a five-year period provides a 5-year average of 132 dwellings per annum (dpa) (compared to the 140 median dpa calculated over the 14-year Core Strategy period). The same 5-

year trend analysis shows the lowest number of completions in any one year to be 114 units, and the highest number to be 150 units (compared to 52 and 233, respectively, over the 14-year Core Strategy period). Whilst a longer historic period can even out anomalies in data (e.g. strong and weak performance), it may also mask more recent hidden trends, for example, any recent market issues.

- Thus, the 140 dpa reported in the latter years of the plan period, has been revised down to 112. The mid-period figure of 112 units in the SHELAA has effectively been extended through the plan period to take a more cautious approach to supply.
- A stepped allowance for windfall completions has been included in the trajectory. In the submission CLLP housing trajectory, this takes zero units for the first three years of the supply period following adoption, on the basis that it would be expected that windfalls in those first three years would be picked up as extant units with planning permission.
- However, in the HLPS housing trajectory, the stepped approach takes zero units for the first 2 years of the supply period, and then steps the forecasts from year 3 on the basis that some completions would be expected from windfalls in those years i.e. whilst some windfalls will be identified through currently extant permissions, it would be expected that additional units will be permitted through years 1-3 to result in some completions in Year 3, rather than zero completions.
- Forecasts for year 3 have therefore been revised to approximately half of the 112 dpa figure, and forecasts for year 4 are approximately two-thirds of the 112 dpa figure, to reflect the stepped forecasts.

For the reasons set out through the above bullet points, the Council consider their windfall predictions to be robust.

### **6.5 Has appropriate consideration been given to non-implementation lapse rates?**

In Chorley and Preston lapse rates have been applied to the small windfall sites with planning permission not proposed for allocation (sites of less than 10 dwellings) included in the 'non allocated existing commitments' supply. This takes account of historic trends of the implementation of permissions on small windfall sites. Chorley apply a 23% lapse rate as past trends over a 14-year period identify that 23% of permissions on small windfall sites do not come forward. Preston applies a 10% lapse

rate based on historic trends. In South Ribble, a 10% lapse rate is applied to the small windfall sites with planning permission included in the supply, that have not commenced, based on historic trends.

For large windfall sites with planning permission in the ‘non allocated existing commitments’ supply and for all allocated sites, lapse rates have not been applied. Instead, each site has been individually assessed to determine whether it is deliverable or developable, based on information provided by site promoters and developers.

## **6.6 Overall, is there convincing evidence that:**

### **a) Having regard to assumptions about commitments, allocations and windfalls the housing requirement across Central Lancashire between 2023 and 2041 is likely to be met?**

The updated housing trajectories show that each CLA can meet its housing requirement over the plan period. Each CLA has identified a surplus against its requirement. Cumulatively, 26,406 dwellings are projected to be completed in Central Lancashire over the plan period. This is a surplus of 2,751 dwellings (12%) against the total housing requirement of 23,655 dwellings.

### **b) A 5-year supply of deliverable housing land will exist on adoption?**

A five-year supply of deliverable housing will exist for each CLA on adoption of the CLLP.

The calculation is based on the assumption that the CLLP will be adopted after 1<sup>st</sup> April 2026 and uses the projected completions in each Council’s trajectory for the years 2026/27 to 2030/31. It includes a 5% buffer as required by paragraph 78 of NPPF (2024). Whilst the CLLP has been prepared under the NPPF (2023), upon adoption the buffer requirements in the NPPF (2024) will apply for five-year supply calculations. A 20% buffer is not required for any of the CLAs for plan making as it is anticipated that each CLA will achieve more than 85% in the latest HDT at the point of adoption, recalculated using the housing requirement in the adopted CLLP.

Each CLA will have the following housing land supply upon adoption:

Chorley = 7 years

Preston = 7 years

South Ribble = 6.2 years

The Inspectors previously requested five year supply information from the CLAs covering the period 1<sup>st</sup> April 2025 to 31<sup>st</sup> March 2030. This is set out in documents HO18a to HO18g. Whilst adoption is anticipated after 1<sup>st</sup> April 2026 when the five year supply calculation will be updated, a calculation is also provided using this five year period, in line with the information requested by the Inspectors. Based on the supply identified for each CLA in this five year period, and applying a 5% buffer, each CLA would have the following supply using the housing requirement in the CLLP:

Chorley = 6.4 years

Preston = 7.3 years

South Ribble = 5.9 years

**c) The Plan provides specific, developable sites so that a supply of deliverable or developable housing land is likely to exist throughout the plan period?**

The Central Lancashire housing trajectory shows a supply in excess of the requirement over the plan period as a whole. However, the majority of development is expected to come forward in the earlier years of the plan. The Central Lancashire trajectory shows that supply will exceed the requirement every year until 2033/34 which is year 8 of the plan period following adoption. The CLLP will have been reviewed by this point as the NPPF requires local plans to be reviewed at least every five years.

## Updated Chorley Housing Trajectory

	Pre-adoption			Years 1-5					Years 6-10					Years 11-15					TOTAL
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	
Actual completions	291	383																	674
Projected completions on allocated sites			234	225	377	350	199	460	518	407	231	167	78	60	58	0	0	0	3,364
Projected completions on non-allocated existing commitments at 1st April 2025			214	178	179	77	86	161	48	30	30	18	0	0	0	0	0	0	1,021
Windfall allowance			0	0	0	63	63	99	99	99	99	99	99	134	134	134	134	134	1,390
<b>TOTAL PROJECTED COMPLETIONS</b>	<b>291</b>	<b>383</b>	<b>448</b>	<b>403</b>	<b>556</b>	<b>490</b>	<b>348</b>	<b>720</b>	<b>665</b>	<b>536</b>	<b>360</b>	<b>284</b>	<b>177</b>	<b>194</b>	<b>192</b>	<b>134</b>	<b>134</b>	<b>134</b>	<b>6,449</b>
Annual Requirement	280	280	280	345	345	345	345	345	345	345	345	345	345	345	345	345	345	345	6,015
Difference	11	103	168	58	211	145	3	375	320	191	15	-61	-168	-151	-153	-211	-211	-211	434

## Updated Preston Housing Trajectory

	Pre-adoption			Years 1-5					Years 6-10					Years 11-15					TOTAL
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	
Actual completions	1,630	660																	2,290
Projected completions on allocated sites			153	333	380	414	321	331	469	325	262	322	421	468	393	432	397	88	5,509
Projected completions on non-allocated existing commitments at 1st April 2025			451	600	594	398	351	84	155	158	65	180	70	40	40	40	40	39	3,305
Windfall allowance			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>TOTAL PROJECTED COMPLETIONS</b>	<b>1,630</b>	<b>660</b>	<b>604</b>	<b>933</b>	<b>974</b>	<b>812</b>	<b>672</b>	<b>415</b>	<b>624</b>	<b>483</b>	<b>327</b>	<b>502</b>	<b>491</b>	<b>508</b>	<b>433</b>	<b>472</b>	<b>437</b>	<b>127</b>	<b>11,104</b>
Annual Requirement	520	520	520	520	520	520	520	520	520	520	520	520	520	520	520	520	520	520	9,360
Difference	1,110	140	84	413	454	292	152	-105	104	-37	-193	-18	-29	-12	-87	-48	-83	-393	1,744

## Updated South Ribble Housing Trajectory

	Pre-adoption			Years 1-5					Years 6-10					Years 11-15					TOTAL
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	
Actual completions	579	488																	1,067
Projected completions on allocated sites			0	35	156	321	315	345	320	376	381	356	294	144	87	70	70	70	3,340
Projected completions on non-allocated existing commitments at 1st April 2025			503	447	328	304	194	168	158	132	132	120	96	96	96	96	92	0	2,962
Windfall allowance			0	0	60	80	112	112	112	112	112	112	112	112	112	112	112	112	1,484
<b>TOTAL PROJECTED COMPLETIONS</b>	<b>579</b>	<b>488</b>	<b>503</b>	<b>482</b>	<b>544</b>	<b>705</b>	<b>621</b>	<b>625</b>	<b>590</b>	<b>620</b>	<b>625</b>	<b>588</b>	<b>502</b>	<b>352</b>	<b>295</b>	<b>278</b>	<b>274</b>	<b>182</b>	<b>8,853</b>
Annual Requirement	460	460	460	460	460	460	460	460	460	460	460	460	460	460	460	460	460	460	8,280
Difference	119	28	43	22	84	245	161	165	130	160	165	128	42	-108	-165	-182	-186	-278	573

## Updated Central Lancashire Housing Trajectory

	Pre-adoption			Years 1-5					Years 6-10					Years 11-15					TOTAL
	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	
Actual completions	2,500	1,531																	4,031
Projected completions on allocated sites			387	593	913	1,085	835	1,136	1,307	1,108	874	845	793	672	538	502	467	158	12,213
Projected completions on non-allocated existing commitments at 1st April 2025			1,168	1,225	1,101	779	631	413	361	320	227	318	166	136	136	136	132	39	7,288
Windfall allowance			0	0	60	143	175	211	211	211	211	211	211	246	246	246	246	246	2,874
<b>TOTAL PROJECTED COMPLETIONS</b>	<b>2,500</b>	<b>1,531</b>	<b>1,555</b>	<b>1,818</b>	<b>2,074</b>	<b>2,007</b>	<b>1,641</b>	<b>1,760</b>	<b>1,879</b>	<b>1,639</b>	<b>1,312</b>	<b>1,374</b>	<b>1,170</b>	<b>1,054</b>	<b>920</b>	<b>884</b>	<b>845</b>	<b>443</b>	<b>26,406</b>
Annual Requirement	1,260	1,260	1,260	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	1,325	23,655
Difference	1,240	271	295	493	749	682	316	435	554	314	-13	49	-155	-271	-405	-441	-480	-882	2,751