

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 6 – Housing Land Supply

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 6 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 3 – The Housing Requirement
 - Matter 5 – Housing Allocations
- 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

Q6.1: 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?

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

2.1 The Housing Trajectory Assumptions Document sets out the assumptions imposed with respect to lead-in times. Bloor welcomes the use of Start to Finish (3rd edition) ('STF3') to inform lead-in times for sites of over 50 units, as the exemplar industry standard. Bloor welcomes the recognition that where delivery timescales are provided by the site promoter, they should be compared to STF3 to ensure that they are realistic. The Housing Trajectory Assumptions Document sets out that where a site does not have planning permission, and no information on delivery timescales has been provided by the site promoter, assumptions should be made on when a planning application is likely to be submitted. This would represent a Category B Site, and in the absence of clear evidence, no units should be included from these sites within the five-year supply. Furthermore, where no information is made available by the landowner or the developer, the Council must provide sufficient information to demonstrate that the site is truly deliverable including demonstrating that the site is available, suitable and achievable within a reasonable timeframe (i.e. within 5 years).

2.2 Sites under 50 units fall outside of the remit of STF3. Lead in times and build out rates for these sites should be based on evidence from the landowner/development involved and past experience from local sites of that size. It is well established that greenfield sites and brownfield sites, and indeed set out in STF3, that greenfield sites typically deliver more quickly than brownfield sites, as a result of site constraints and preparatory works. It is therefore not appropriate for the same lead in times to be imposed for greenfield and brownfield sites.

Q6.2: 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?

2.3 No. Appendix 3 of the CLLP sets out that 6,499 units will be delivered on non-allocated existing commitments. It appears that the Councils have not applied an overall lapse rate to these commitments, to account for the probability that not all sites with planning permission will come forward.

2.4 Examination Document HO18.f (Overall Housing Land Supply South Ribble), acknowledges that "*historical data analysis of planning applications shows that approximately 10% of small sites have seen their permission lapse within three years of their decision date.*" Accordingly, a 10% lapse rate has been applied to all minor sites where work is not yet believed to have commenced. In reality, there may be instances where works are commenced to secure permissions prior to them lapsing, but no dwellings are delivered on site.

- 2.5 Chorley's Housing Land Supply Statement (2025) applies a 40% reduction to windfall sites of less than 10 dwellings, to account for permissions not implemented. This is based on past trends. Clearly, Chorley and South Ribble Councils acknowledge that lapse rates are appropriate.
- 2.6 Although Chorley is applying a lapse rate to sites with capacity of less than 10 units, it is not proposing any similar rate for larger sites. Bloor considers that it would be appropriate for a 10% lapse rate to be applied to all existing commitments with an extant permission, to ensure that sufficient land is allocated to meet housing needs and reflects the likelihood that not all commitments will be delivered. Without applying an appropriate lapse rate, the CLLP will be reliant on all units benefiting from planning permission coming forward within the Plan period, or additional windfall sites beyond those already accounted for, to meet housing need.
- 2.7 The Councils should provide effective and robust evidence to demonstrate that all committed sites will come forward over the plan period. This is particularly pertinent in the context of the Local Plan Main Viability Report, which demonstrates that the plan area is constrained by viability, indicating that some units with permission will not come forward.
- 2.8 *Q6.3: 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?*
- 2.9 No. As set out in greater detail in Bloor's Regulation 19 Representations and Matter 5 Paper, there are concerns with the developability of at least six allocations in Chorley. With these six allocations removed, the claimed supply from allocations in Chorley falls by 668 units, to 2,775 units over the Plan period. Our analysis has not considered sites with a capacity under 40 units in Chorley, or sites in South Ribble and Preston but a similar analysis would likely result in sites needing to be removed from their supply too.
- 2.10 The CLLP must be underpinned by evidence that proves the land it allocates for residential development is developable. Bloor's site at Springfield Road, Coppull is developable and available. It should be allocated for residential development to ensure that housing need is met across the Plan period.
- Q6.4: 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?*
- 2.11 No. The windfall allowance accounts for 13.3% of the total housing requirement set out in the CLLP. This is a significant proportion of the housing supply and does not represent a positive approach to Plan making. Almost half of the claimed windfall supply is from Chorley. This includes 1,489 claimed windfall units — representing 24.8% of Chorley's overall requirement — and 1,650 units in South Ribble, which equates to 19.9% of that borough's target. Notably, no windfall allowance has been included for Preston.
- 2.12 Bloor is concerned about the reliability of windfall sites as a source of housing supply in Chorley over the plan period. There is a lack of compelling evidence to support their continued contribution as is required by the provisions of the NPPF. Additionally, Bloor is

concerned about the inconsistent approach taken across the three districts in accounting for windfall allowances.

- 2.13 The Central Lancashire Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 outlines the methodology used to calculate windfall allowances for each district. For Chorley, the SHELAA provides a breakdown of windfall completions between 2010 and 2024, distinguishing between small sites (1–9 units) and large sites (10+ units). Over this period, Chorley saw an average of 140 dwellings per annum (dpa) delivered through windfall development. There was an average of 77 dpa on large windfall sites and 63 dpa on small windfall sites. Looking back over past completions from windfalls is only one part of the equation and to justify such a high windfall allowance, the Council must also demonstrate that there is a likely sufficient supply of land available within the authority area. Chorley has not adequately demonstrated that past trends are likely to continue in a consistent manner over the next plan period.
- 2.14 Over the past 14 years, housing completions on large windfall sites in Chorley have fluctuated considerably. For example, between April 2012 and March 2017, net completions on large windfall sites notably declined, averaging just 13.3 dwellings per annum. This downturn coincided with the adoption of the Central Lancashire Core Strategy in July 2012, suggesting that the introduction of the new local plan may have contributed to the reduced delivery. This inconsistency highlights that such sites have not served as a reliable source of housing supply during this period.
- 2.15 Outside of this timeframe, however, completions on large windfall sites rose sharply. This increase is likely attributable to a surge in speculative applications on non-allocated land, driven by the Core Strategy’s housing policies becoming outdated and the Council not being able to demonstrate a 5-year supply (and being susceptible to speculative applications). As a result, windfall delivery during these later years was artificially elevated.
- 2.16 Given these trends, using the average delivery from 2010 to 2024 as a basis for future projections is fundamentally flawed. The data over this period has been significantly influenced by policy changes and speculative development patterns, undermining its reliability as a benchmark.
- 2.17 An out-of-date local plan has contributed to an artificially high level of windfall completions in recent monitoring years. Following the adoption of the CLLP, it is anticipated that windfall delivery will decline. Historically, windfalls have not delivered housing at a consistent rate in Chorley, and the available evidence does not support the assumption that past delivery levels will continue. Consequently, the elevated delivery from windfall sites in previous years should not be considered a reliable indicator of future supply.
- 2.18 In addition to this, the SHELAA anticipates that completions resulting from changes of use and building conversions will continue to contribute to windfall development and remain a reliable source of supply. This expectation is partly based on the expansion of permitted development rights—first introduced under the Coalition Government and further extended by the Conservative Government in 2021—which made it easier to convert existing buildings into residential units.

2.19 However, most suitable, sustainable, and deliverable buildings are likely to have already been converted. With the most appropriate sites having come forward, it is reasonable to expect a decline in the number of future conversions and change-of-use applications. Therefore, the Council's continued reliance on these types of developments as a consistent source of windfall supply throughout the plan period is questionable and potentially flawed.

2.20 Finally, the CLLP includes a windfall allowance for small sites starting from year two of the plan period (2027/2028). However, windfall sites are, by definition, unplanned and typically do not have planning permission in place. Given the lead-in times associated with securing planning approval and the time required for land to become available for development, it is widely accepted that windfall allowances should not be factored in until year three of the plan period (i.e., 2028/2029). Including windfall allowances earlier risks overestimating short-term housing supply or double counting.

2.21 In conclusion, Bloor does not consider there to be compelling evidence that windfalls in Chorley will provide a reliable source of supply at the level proposed over the plan period.

Q6.5: Has appropriate consideration been given to non-implementation lapse rates?

2.22 No. As set out above in the response to Q6.2, there has not been appropriate consideration to non-implementation lapse rates. Bloor considers that a 10% lapse rate should be applied to the supply from extant permissions to account for non-implementation. Additional land should be allocated for residential development to ensure that housing need is met.

Q6.6: 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?

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

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?

2.23 No, the CLLP requirement will not be met. As set out in detail above, and in Bloor's Matters 2 and 5 Papers and Regulation 19 representations, there are concerns in relation to commitments, allocations and windfalls. Taken together, this amounts to considerable concern that housing requirement across Central Lancashire between 2023 and 2041 will not be met. Accordingly:

- A 10% lapse rate should be applied to all existing commitments with extant permissions to account for permissions not delivered;
- The windfall allowance should be reduced as they have not historically provided a reliable source of housing supply (as required by paragraph 72 of the 2023 NPPF) and there is no evidence to demonstrate that they will be a reliable source in the future; and,

- Several allocations should be removed from the claimed supply (as set out in Bloor's Matter 5 Paper).

- 2.24 Once these adjustments have been made, **a five-year housing land supply will not exist upon adoption for Chorley**. This is even when taking into account Chorley's reduced housing requirement (334 dpa, when not stepped) as a result of the redistribution of housing requirement across the plan area.
- 2.25 The Overall Housing Land Supply Chorley Document (ref. HO18d) sets out a claimed supply of 2,245 units in Chorley from the five-year period to 2029/30. This includes several 'Category B' sites. Bloor considers that the Council has failed to provide evidence to demonstrate that these sites are deliverable, or that it is appropriate for the trajectories provided to depart from those provided in Start to Finish 3. These sites are detailed below.

Charter Lane, Charnock Richard (HS2.8)

- 2.26 A full planning application for 57 dwellings on the site is pending determination (ref. 25/00457/FULMAJ). The application was submitted in May 2025. STF3 sets out that the average timeframe from validation of the first application to completion of the first dwelling is 3.8 years, meaning that first delivery would not occur until the 2029/30 monitoring year. Applying STF3 average build out rates for a site of this size (20dpa), **37 units should be pushed back beyond the first five-years**.

Little Knowley Farm (HS2.10)

- 2.27 A full planning permission for 146 dwellings was submitted in July 2025 and is pending determination (ref. 25/00634/FULMAJ). As set out in Bloor's Matter 5 Paper, this site is not considered to meet the definition of developable, and the Council has not provided sufficient evidence to demonstrate that known site specific constraints can be addressed. Accordingly, **all 110 units are removed from the five-year supply**.

Eaves Green (HS2.13)

- 2.28 There is no live application for planning permission. The information provided by the Council with respect to the site does not represent clear evidence required to justify the site's inclusion in the five-year supply. **All 29 units are accordingly removed**.

Land at Bagganley Lane (EC5.3)

- 2.29 A full application for 174 dwellings was submitted in October 2025 and is pending determination (ref. 25/00907/FULMAJ). Assuming determination of the application in April, first delivery on the site would be in the 2029/30 monitoring year. Accordingly, only 49 units would be delivered on the site within the five-year period, and **98 units should be removed from the first five years**.

West of M61 – Town Lane (HS2.35)

- 2.30 An application for the erection of 280 dwellings was submitted in November 2023 and is pending determination. It is unclear why this application has not progressed. Should the

application be determined early 2026 (as a best-case scenario), first delivery would not occur until the 2029/30 monitoring year (average planning to delivery period of 3.2 years as set out in STF3). Accordingly, only 49 units would be delivered on the site within the five-year period, and **98 units should be removed**.

- 2.31 Applying the above reductions (totalling **372 units**) and removing the 126-unit windfall allowance (as historic delivery from windfall sites has not represented a reliable source of supply as required by the NPPF) the supply falls to **1,747 units**.

Table 1 5YHLS Calculation – with Stepped Requirement

A	Annual Housing Requirement	280 (2025/26), 345 (2026/27 – 2029/30)
B	Five Year Requirement (A*5)	1,660
C	Five Year Requirement with 20% Buffer (B + 20%)	1,992
D	Five Year Supply	1,747
E	5YHLS Position ((D/C)*5)	4.39 years

Source: Lichfields Analysis

Table 2 5YHLS Calculation – without Stepped Requirement

A	Annual Housing Requirement	334
B	Five Year Requirement (A*5)	1,670
C	Five Year Requirement with 20% Buffer (B + 20%)	2,004
D	Five Year Supply	1,747
E	5YHLS Position ((D/C)*5)	4.36 years

Source: Lichfields Analysis

- 2.32 The above calculations do not net off previous oversupply. It is however acknowledged that this amounts to a total of 27 units and would not result in Chorley being able to demonstrate a five-year supply of deliverable housing land.
- 2.33 A 20% buffer is applied as the Plan will not represent 80% of the LHN figure on adoption, in accordance with the transitional arrangements.
- 2.34 Bloor firmly oppose the introduction of a stepped requirement, particularly given that Chorley is already offloading a significant proportion of its requirement to South Ribble and Preston. This is not in keeping with the spirit of the Government’s objective of significantly boosting the supply of housing (2023 NPPF paragraph 60). This approach does not facilitate growth and only pushes housing requirement into the later years of the Plan period.
- 2.35 Of particular concern, the Chorley Overall Housing Supply suggests that housing delivery in the last five years of the plan will comprise two small sites of eight and ten dwellings respectively, delivery from HS2.11, (which Bloor consider should be removed from the

supply all together as it is not developable) and an increased windfall allowance. The SHLAA indicates that this increased windfall allowance is the result of additional sites becoming available during the Plan period. In reality, the most appropriate and available sites are likely to come forward in the early stages of the Plan. As a result, there is likely to not be a supply of deliverable housing land in Chorley in the later stages of the Plan.