

**Stantec on behalf of Story Homes, Persimmon, Taylor Wimpey, Northern Trust, and  
Wain Homes (the 'Consortium')**

**Examination into the Central Lancashire Local Plan**

**Matter 6: Housing Land Supply**

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

***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?***

1. The housing trajectory for the three Central Lancashire authorities is set out at Appendix 3 of Central Lancashire Local Plan 2023-2041 (core document CD01). The three authorities have then provided an updated trajectory (HO17) alongside the submission of the Plan which shows the capacity of the four main components of its housing supply<sup>1</sup> remaining precisely the same as that set out in the publication version of the Local Plan (which was consulted on between February and April 2025). However, further to the submission, updated housing supply evidence has then been presented at core documents H18a-f submitted to the examination in August / September 2025 which adjusts the capacity of the housing supply but does not include an updated trajectory.
2. Notwithstanding our objections to the Council's housing supply evidence, by the Authorities' own evidence the housing trajectory should obviously be revisited to reflect the updated (and significantly weakened) housing supply position.
3. Further to the information available at the publication version of the Local Plan consultation, the Central Lancashire authorities have now provided additional information on Housing Trajectory Assumptions (core document MO08). Whilst this additional information is helpful in understanding how the Central Lancashire authorities have gone about their work, it does not provide reassurance that housing trajectory assumptions are soundly based.

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<sup>1</sup> Housing supply components being: actual completions, projected completions on allocated sites, and projected completions on non-allocated existing commitments at 1<sup>st</sup> April 2024, and windfall allowance.

4. The authors of the Housing Supply Trajectory document state that they have used the Lichfields' research paper '*Start to Finish - How quickly do large-scale housing sites deliver?*' (Third Edition) to inform assumed timeframes for completions to begin. However, Lichfields are clear that pre-submission work is difficult to estimate and have therefore not included it in their analysis. Based upon experience, the members of the Consortium strongly agree and note that the time it can take to prepare planning application submission (including, going from technical due diligence, pre-application enquiry, public consultation, and scheme fix to submission) is uncertain and subject to many variables. We therefore conclude that it is not helpful to assume pre-application timescales (where an application hasn't been submitted) but rather to follow the guidance of the NPPF and assume that delivery on sites without planning permission (or a permission) should not be considered within the 5 year housing supply (2026/27 - 2030/31); i.e. will not begin to deliver before 2031/32 absent very clear evidence to the contrary. We therefore strongly disagree with the timescales in Document MO08 that sites of between 50-99 units can be assumed to start delivery within 3.8 years where no planning application has yet been submitted.
5. In critiquing when sites in the Central Lancashire housing supply may come forward, as part of the Housing Supply Assessment submitted to the Regulation 19 consultation, we have removed sites where no planning application has been made from the 5 year supply unless we have very clear evidence to the contrary. There appear to be a number of instances where the Central Lancashire authorities, continue to include sites within its 5 year supply where it does not have evidence to support doing so. This is relevant to such sites as housing allocation EC5.3 (Land at Bagganley Lane, Chorley) where no application has been submitted, but the site has been included with the 5 year housing supply. In our housing supply critique, we have retained this site in the developable supply, but without clear evidence to suggest an application submission is imminent, it should not be included within the 5 year housing land supply.
6. Where planning permission has been applied for, the assumptions provided by Lichfields' September 2024 report appear reasonable. However, each of the Councils will record its own performance on time taken to determine planning applications and it is not clear why that information is not being used rather than the Lichfields report.
7. With respect to build-out rates, if no information has been provided by the site promoter, the Central Lancashire authorities have again used Lichfields' '*Start to Finish - How quickly do large-scale housing sites deliver?*' (Third Edition), applying a mean average based on the capacity of the site. We object to that approach; the Councils' own evidence (based on developer expectations) has shown that build-out rates (and market conditions) across the Central Lancashire region vary considerably and, for larger sites, are typically below the rate envisaged by the Lichfields report. It is unclear why the Council haven't then sought to apply its own evidence-base to sites where developers haven't expressed a view. Moreover, it is a concern that sites have been included in the

Central Lancashire housing supply where there is no evident developer interest. Local evidence, where available should be used in preference to national average evidence, especially where there is a considerable variance between the two.

***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?***

8. No. As the Inspector will see from our Regulation 19 Representations, we have not sought to remove any specific sites from the Councils' supply. However, as addressed in relation to Q6.5 below, the Local Plan should not assume a 100% delivery of all of its permitted supply and must account for some slippage. This is conventionally done in plan making and it remains unclear why the Councils' have not sought to do so in this case.

***Q6.3 Is there a reasonable prospect that a total of 13,440 new dwellings to be delivered through local plan allocations will be provided by 31/03/41?***

9. No. Having undertaken a detailed analysis of Central Lancashire's draft Strategic Sites and all proposed allocations, it is concluded that the Central Lancashire claimed housing land supply in the Plan is patently exaggerated and overestimates the quantum of development that it can accommodate over the plan period.
10. Stantec have reviewed the updated housing evidence published by the three authorities in September and conclude that the number of homes which could be realistically delivered at proposed allocations is 2,024 fewer than stated. Our updated assessment spreadsheets (appended to this Hearing Statement) sets out that the Central Lancashire authorities continue to identify insufficient sites to meet the region's housing requirement as outlined in the Local Plan submitted for examination. No evidence has been presented by the Central Lancashire authorities that warrants a change in our position with respect to Preston City Centre sites.

***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?***

11. As set out in the Housing Supply Assessment submitted to the publication version of the Local Plan consultation in April 2025, we have substantial concerns over the assumptions for large windfall sites. No further evidence has been presented by the Central Lancashire authorities that warrants a change in our position.
12. The Central Lancashire authorities fail to consider the impact that an up-to-date Local Plan will

have on windfall delivery. When housing policies of a development plan are out-of-date or historic, it is reasonable to expect a higher delivery of windfall than there would be ordinarily. The current Core Strategy is 13 years old based upon housing need assessments of even greater vintage. With an up-to-date plan in place, one should expect fewer houses delivered by windfall development, particularly on large windfall sites for large sites suitable for housing which should have been allocated for housing. That is not to say that no windfall sites will deliver, but rather that windfalls will obviously come forward at a lower rate following adoption of an up to date plan. This obvious point hasn't been factored in by the Councils.

13. In addition, the Central Lancashire Local Plan is required to be reviewed at least 5 years after its adoption and its housing policies updated accordingly to ensure they reflect changes affecting the area and any updated policy (NPPF paragraph 33). The requirement to review housing policies every five years will inevitably put downward pressure on large scale windfall development as such suitable sites should be incorporated into the Council's housing supply as allocations.
14. Accordingly, the Consortium remains of the view that the windfall allowance for Chorley and South Ribble should be reduced by 607 and 488 dwellings respectively.

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

15. No evidence has been provided by the Central Lancashire authorities to suggest that they have properly considered the non-implementation or lapsing of planning permission and how this may affect its housing trajectory.
16. The Central Lancashire Local Plan as drafted fails to make adequate allowance for the likelihood that not all planning permissions will be implemented. Inherent within the housing land supply is a degree of risk and uncertainty: permissions lapse – often for unforeseeable reasons, schemes stall for viability or ownership reasons, and allocated sites can experience unexpected constraints or delays. Without an appropriate allowance for non-implementation, the Local Plan risks overstating the deliverable and developable supply and therefore underestimating the level of provision required to meet identified housing needs in full.
17. It is good practice, consistent with approaches adopted elsewhere (for example Wirral Local Plan – see Inspectors report paragraph 399), to apply a non-implementation or lapse allowance to the housing supply as a whole, including all categories of permission and allowance. This ensures that the Plan makes sufficient provision to deliver its housing requirement in reality.
18. Accordingly, the Plan should incorporate a clear and consistent 10% non-implementation allowance

across all components of the supply. Without such an allowance, there is a considerable risk that the Plan cannot be considered sound for it fails to demonstrate that it is positively prepared or effective in meeting the area’s identified housing need over the plan period.

**Q6.6 Overall, is there convincing evidence that:**

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

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

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

19. No. Stantec undertook a comprehensive review of the Central Lancashire Housing Supply as part of the Regulation 19 consultation in April 2025. This Assessment concluded that the Central Lancashire authorities would not have a 5 year housing land supply at the point of the Local Plan’s adoption, and that overall the Central Lancashire authorities have identified insufficient sites to meet the region’s housing requirement as outline in the Local Plan.
20. Subsequently, the Central Lancashire authorities published updated housing supply evidence in September 2025 (core documents HO18a-f); Stantec has reviewed this evidence and have prepared updated assessment spreadsheets (appended) to set out what has changed since the Regulation 19 consultation. The Updated Spreadsheets have been prepared in the context of the same methodology as set out in the April 2025 Assessment and appended to this Statement for reference.
21. In summary, the updated spreadsheets provide an analysis of proposed allocations and existing commitments over 50 units. A summary of how the Central Lancashire supply has changed been April and September 2025 is set out below in turn.

Table 1: Chorley housing supply position April-September 2025

<b>First 5 years of the plan</b>		
Stated position April 2025	Stantec Position April 2025	Difference
2,084	1109	-975
Stated position Sep 2025	Stantec Position Sep 2025	Difference
1,829	1053	-776
<b>Overall position</b>		
Stated position April 2025	Stantec Position April 2025	Difference
4088	3477	-611
Stated position Sep 2025	Stantec Position Sep 2025	Difference
3,718	3229	-489

Table 2: Preston housing supply position April-September 2025

<b>First 5 years of the plan</b>		
Stated position April 2025	Stantec Position April 2025	Difference
833	665	-168
Stated position Sep 2025	Stantec Position Sep 2025	Difference
1,975	1778	-197
<b>Overall position</b>		
Stated position April 2025	Stantec Position April 2025	Difference
6,364	3165	-3199
Stated position Sep 2025	Stantec Position Sep 2025	Difference
5,577	3986	-1,591

22. This reduction in the Preston housing land supply is in large part due to a reduction in the number of dwellings set to come forward at Strategic Site SS3 from 2,767 units to 1,827 units. Otherwise, the main changes to Preston’s housing supply that have taken place since April 2025 are as follows:

- At Strategic Site SS5 (Preston West), Hybrid application (06/2022/1101) for 161 units was approved in July. Accordingly, 161 units have been brought into Preston’s 5 year housing land supply. The remaining units to come forward within the plan period continue to be anticipated to come forward at 65 units per year from year 6 of the plan.
- The Council have provided new evidence to suggest that 711 units at Strategic Site SS3 (North West Preston / Bartle) will come forward within the first 5 years of the plan. We only include 200 units in our 5 year housing land supply critique, as there is only detailed permission for 229 units (06/225/0636). We have included 200 units rather than 229, as we anticipate build out rates of 40 dwellings per year for a parcel of this size. The Hearing Session on this allocation and discussions on its deliverability will be key.
- Preston have reduced the number dwellings anticipated to come forward at Strategic Site SS3 by 940 dwellings. This Strategic Site was originally earmarked for 2,767 dwellings. Again, the Hearing Session on this allocation and discussions on its deliverability will be key.
- Preston have included allocation HS4.24 (The Sumners, 195 Watling Street Road) for 77 units within its 5 year housing land supply. Whilst Reserved Matters has been secured (06/2023/0531), there is no recent correspondence with the site’s agent or delivery partner and therefore its delivery is unclear, and therefore we continue to retain the site in Preston’s housing supply but remove it from the 5 year period.
- Barratt Homes have provided a planned timetable for its interest at allocation HS4.1 (Former Whittingham Hospital) which has allowed 161 dwellings to be brought into Preston’s 5 year

housing land supply.

Table 3: South Ribble housing supply position April-September 2025

<b>First 5 years of the plan</b>		
Stated position April 2025	Stantec Position April 2025	Difference
2,875	1554	-1,321
Stated position Sep 2025	Stantec Position Sep 2025	Difference
2,338	1426	-912
<b>Overall position</b>		
Stated position April 2025	Stantec Position April 2025	Difference
5,474	5315	-159
Stated position Sep 2025	Stantec Position Sep 2025	Difference
5,237	5147	-90

23. Of note, South Ribble has:

- Reduced the capacity of Strategic Site SS6 A (Pickering’s Farm) by 250 units;
- Removed 200 units at allocation HS3.5 (Church Lane, Farrington) from its 5 year housing land supply;
- Removed 500 units at allocation HS3.1 (Land off Emnie Lane) from its 5 year housing land supply

24. A such, having reviewed the evidence underpinning the emerging Local Plan, the Consortium is of the view that the Councils continue to overstate its housing land supply. Table 4 below provides a summary of the critical analysis undertaken of the different components of Central Lancashire’s September 2025 housing land supply by local authority and across Central Lancashire generally. It sets out that the housing supply in Central Lancashire is 2,170 fewer than what the three authorities have identified.

Table 4: Housing Land Supply Update Summary

	<b>Stated supply (proposed allocation and existing commitments over 50 units)</b>	<b>Stantec analysis</b>	<b>Difference</b>
Central Lancashire	14,532	12,362	-2,170

25. The Plan’s trajectory significantly exaggerates the level of development that can realistically be delivered over the plan period. While the Consortium supports the timely adoption of a new development plan, this can only occur where the Plan is demonstrably sound. The Consortium has significant reservations about the methodology used to assess housing supply. As currently drafted,

the Local Plan contains fundamental flaws which, if not addressed, should lead to a finding that it is unsound at examination. The majority of identified sites appear to derive from existing commitments, previous allocations, or safeguarded land, with comparatively few genuinely new allocations. Accordingly, the adoption of the Plan in its current form may offer limited additional certainty or housing delivery benefit, while embedding policies or allocations that have not been adequately tested. It would be patently unsound to allow the Central Lancashire authorities to wait until a review of the Local Plan to address fundamental flaws which are already apparent.

**Total Word Count (Excluding Questions): 2,568**

## **Appendix 1 – Updated housing supply spreadsheets**

**(following updated housing supply evidence published September 2025)**

















