

**Central Lancashire Local Plan – Examination
Hearing Statement on behalf of Gladman
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?**

It is understood that where information from developers or site promoters has not been received, the assumptions set out in the Housing Trajectory Assumptions paper (MO08) are used and these assumptions are informed by past delivery rates and the ‘Start to Finish’ report updated and re-published by Lichfields in September 2024.

We generally endorse the findings of the ‘Start to Finish’ report as they generally reflect our experience of build out rates and latest market feedback from housebuilders operating across the country (and in Central Lancashire). In particular, we highlight that the report demonstrates how multiple outlets operating concurrently from a development site does not mean that the number of homes delivered from that site increases proportionately.

Other factors such as local market conditions, general economic trends, proximity to competing developments, housing market demand, the quality and type of units available as well as the overall scale of a development will also influence lead-in and build-out rates.

In particular, for sites with three or more outlets a maximum of 100 dwellings per annum more closely reflects a realistic build-rate from a single site, and we note submissions made by other representors responding to the Regulation 19 draft of the Plan suggested a similar figure.

By way of example, we note that the 5 Year Housing Land Supply site proformas for Preston site (HO18b) assumes that ‘Land at Bartle, Preston’ (Local Plan ref. SS3) will deliver 99 homes in 2026/27 (i.e. Year 2 of the ‘post-adoption’ 5 year period - and the next monitoring year from now) and assumes far higher build-out rates than the ‘Start to Finish’ report indicates is realistic (and the MO08 assumptions generally endorse), from Years 4 and 5 (194 in 2028/29 and 195 in 2029/30) from this proposed allocation with outline permission for 1,100 units¹.

This example highlights that responses received from developers or promoters need to be sense-checked and provides one example (albeit a key strategic development example) of inflated delivery being assumed within the Council’s identified supply.

¹ submitted 2020 and granted August 2021

This key example also demonstrates that strategic-scale housing development in Preston has longer lead-in to delivery than suggested in the MO08 assumptions, as the time taken to deliver homes from this site has already exceeded the MO08 assumption. However, the assumption that 99 homes will be delivered next monitoring year (beginning 1st April 2026) from this emerging allocation with outline planning permission (only) is in any event entirely unrealistic, showing that the lead-in assumed in MO08 should be re-considered.

By way of another example, we also note that 48 homes are assumed from 2028/29 (Year 4 post-adoption) from South Ribble site 'Pickering's Farm' (Local Plan ref. SS6); and then 96 homes in 2029/30, 136 homes in 2030/31 and 2031/32, and over 160 dwellings per annum (between 161 and 196) from 2032/33 to 2039/40 and then 70 dwellings per annum in the final year of the Plan period. These assumed rates are also substantially above the Start to Finish and MO08 rates.

We also note that the Pickering's Farm site was allocated in the 2015 South Ribble Local Plan and has outline planning permission for 1,110 units, from applications with 2021 references. This key example again indicates longer lead-in from strategic-scale development in Central Lancashire than what is otherwise being assumed in MO08.

The accuracy of lead-in and build-out rates is important as over optimistic delivery assumptions from sites, particularly key strategic sites, will result in an insufficient number of homes being delivered against identified need both in the deliverable (5 year) period and during the emerging Plan period. These two strategic-scale examples indicate that anticipated delivery assumptions are not accurate or robust.

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?

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?

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?

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

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?**
- 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?**

We note that detailed submissions have been made by various representors which had reviewed the housing land supply identified in the Regulation 19 draft of the Central Lancashire Local Plan (CLLP). With this in mind, we have not sought to undertake another detailed review of the components of the Councils' identified supplies ourselves but reiterate generally the concerns raised by others at Regulation 19 stage.

For example, we note significant reductions have been suggested to the number of homes that could realistically be delivered from (emerging) CLLP allocated sites, with some submissions suggesting that the Central Lancashire housing land supply should be reduced by over 3,000 homes from this source alone.

We also note that concerns have been raised against the inclusion of a large windfall allowance in Chorley and South Ribble, and we echo those concerns. This is because large windfall sites cannot be relied upon to deliver homes consistently across the Plan period 2023-41. There are inherent uncertainties associated with large windfall sites where there are no guarantees that market conditions, land availability or planning policy constraints will allow large windfall sites to come forward at an assumed and consistent rate.

A large windfall allowance also fails to consider the impact that an up-to-date Local Plan will have on the acceptability and deliverability of large windfall sites. For example, an up-to-date Local Plan will include updated housing policies and housing allocations which large windfall sites are likely to be at odds with and compete with.

For these reasons, we reiterate the concerns raised by others over the inclusion of and reliance on a large windfall allowance and note that representations submitted to the Regulation 19 draft indicated that removing the large windfall allowance would remove over 600 units from Chorley's housing land supply and nearly 500 units from South Ribble's supply over the Plan period. These are sizeable further deductions and further demonstrate the inability of the Plan to deliver the homes that are needed in the Central Lancashire Housing Market Area over the Plan period.

These are two key housing supply components that we share concerns over including in the housing supplies assumed by the Councils and if properly considered should result in significant deductions to the assumed supplies identified by the Councils over the emerging Plan period.

If these component sources of supply alone are reduced to the levels suggested by others in their Regulation 19 submissions, this would reduce each of the Council's indicated supply to a level **below** the planned for housing requirement - meaning the housing that has been planned for in Central Lancashire, and across each of the three authority areas, will not be delivered.

However, we also note, and share, significant concerns raised by others that the Plan's housing requirement has been artificially stifled to ensure that the emerging Plan sits within the December 2023 NPPF's transitional arrangement set out at its paragraph 234a, rather than setting out to plan for and deliver the known needs for housing within the Plan. This

means that the identified Local Housing Needs (LHN) of the three Councils are not being met by the emerging Plan in any event and any deficiency of supply against the already stifled planned housing requirement will exacerbate this known deficiency and the inability of the Plan to meet identified needs.

Turning to the ability of the Central Lancashire Local Plan to demonstrate the minimum required 5 year (or deliverable) supply at the point of the Plan's adoption, we again point to the work submitted by others that indicate sizeable deductions should be made to the Councils' identified 5 year housing land supply (at the point of adoption).

The NPPF is clear that for sites to be considered deliverable, and to be included within a 5 year housing land supply, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

The NPPF goes on to provide examples of what types of housing site should and should not be considered deliverable and gives emphasis to the need for major developments to have detailed planning permission. Major sites with outline permission or which have been allocated in a development plan (only) should **only** be considered deliverable where there is **clear** evidence that housing completions will begin on the site within five years. In other words, there is a clear assumption that these type of sites should not be considered deliverable in principle and should only be considered deliverable if clear evidence is provided to support their inclusion.

PPG² reiterates that robust, up to date evidence needs to be available and sets out the type of evidence that is needed to demonstrate deliverability for these type of sites³. Providing no or weak evidence is not enough to support a major site that is allocated (or draft allocated) and / or has outline planning permission being considered deliverable.

We note that submissions to the Regulation 19 stage of the emerging Plan demonstrate that insufficient evidence has been provided to support the deliverability of a number of draft allocation sites. We also consider that the level of evidence provided falls some way below what the PPG sets out is needed.

We also endorse submissions which demonstrate that a large windfall allowance cannot be relied upon within a deliverable (or 5 year) housing land supply. In doing so we highlight that the NPPF requires local planning authorities to identify and update annually a supply of **specific deliverable sites** sufficient to provide a minimum of five years' worth of housing⁴. Windfall sites (and a windfall allowance) are by definition relying on unknown sites which cannot be specific deliverable sites as they are not even known about yet.

We note that submissions made by others show that, just by reducing supply from major sites that do not have detailed planning permission and removing supply from large windfall sites, none of the three Central Lancashire authorities will be able to demonstrate the minimum required 5 year housing land supply at the point of the Plan's adoption as the number of

² Housing supply and delivery

³ 007 Reference ID: 68-007-20190722

⁴ Against the relevant 5 year requirement

homes that are considered to be deliverable falls short of the planned requirement for the 5 year period.

However, this deficiency is going to be emphasised when the relevant 5 year housing land supply buffer is added (as required by the latest NPPF (paragraph 78) also). For example, if the lowest 5% buffer (paragraph 78 part a) is added this will exacerbate the inability to demonstrate a deliverable housing land supply against the planned for requirement but if (as is likely) paragraph 78 part c) is triggered as a result of the Plan's requirement being 80% or less of the most up to date LHN figure (at that point in time) then a 20% buffer will apply making it even less likely that the minimum required 5 year housing land supply will be demonstrable at the point of the Plan's adoption.

Each of the above points notwithstanding, the level of supply that the Councils consider will be deliverable at the point of the Plan's adoption is not clear from the submitted documents. The Examination Library includes MO04 (Preston City Council Housing Land Position Paper, April 2025), MO05 (South Ribble Housing Land Position and Update to SHLAA 2024/25) and MO06 (Five Year Housing Land Supply Statement, Chorley 2025) which each set out the relevant Council's 5 Year Housing Land Supply position at 1st April 2025 (i.e. now) and measures their (now) identified deliverable supplies against the latest Local Housing Need (LHN) calculated using the Standard Method set out in PPG (because each of the Council's currently adopted Plan requirements are more than 5 years old).

In doing so the 5 year housing land supply calculations included in the Plan's Examination Library highlight the true LHNs for each Council, which are not being planned for in the emerging Plan. It also means that the calculations included in the Examination Library each identify a deliverable supply which has no direct relevance to the Plan's examination (both in terms of supply and requirement). We therefore consider it necessary for the Councils to issue their 5 year housing land supply calculations relevant to the Plan by demonstrating a supply that it considers to be deliverable at the point of adoption and sets out what the 5 year requirement will be at the relevant base date at the point of adoption, including the relevant buffer – for example. This will then enable a proper review of the possible deliverable supplies at the point of the Plan's adoption.

To summarise, the evidence available within the draft Plan and its supporting Examination Library indicates that the claimed housing land supply in the emerging Central Lancashire Local Plan is exaggerated and as submitted the Plan will not deliver the homes needed in the three Central Lancashire authorities over the Plan period. Additionally, the evidence available shows that the Plan will be unable to demonstrate the minimum required 5 year housing land supply at the point of its adoption meaning that its housing policies will be out of date on adoption.

The inability of the emerging Plan to deliver the homes needed across Central Lancashire is reflective of the emerging Plan being rushed to submission to meet the December 2023 NPPF's transitional arrangement rather than properly planning to meet the identified housing needs of the three Councils and further highlights that the submitted Plan is fundamentally unsound.