Central Lancashire Local Plan Examination Matters, Issues and Questions

Matter 3 – The Housing Requirement
(Policy HS1)

Issue 3 - 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:

The proposed housing requirement is justified by evidence from the Housing Study (HO09). Answers to 3.1 a) - d) relate exclusively to HO09.

The second question of 3.1, regarding the assumptions within Housing Demand and Need Assessments (HO10, HO11 and HO12) is answered within Question 3.3.

Housing Study (HO09)

a) Identifying a baseline figure;

Yes. The baseline figure for calculating need is the total sum of the Local Housing Need (LHN) for each of the CLAs using the standard method formula in use at the time the plan was being prepared. This is considered an appropriate basis on which to establish the baseline housing need for the CLLP and is in line with NPPF (2023) para 61.

Paragraph 61 of the NPPF (2023) states that *"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…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"*.

Planning Practice Guidance (PPG Paragraph: 010 Reference ID: 2a-010-20201216) also states that "*The standard method for assessing local housing need provides a **minimum starting point** in determining the number of homes needed in an area*". PPG goes onto state that in the case of joint strategic policy making, "*the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area. It will be for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area*" (NPPG ID: 2a-013-20201216).

Therefore, the Standard Method local housing need (LHN) figures for the three individual authorities combined, sets the baseline requirement for the plan area. At the time the evidence presented in the Central Lancashire Housing Study Update (DLP Planning & Edge Analytics, December 2024) (HO09) was prepared, the combined Standard Method figure was 944 dwellings per annum. This is the **baseline requirement** for the CLLP.

b) Forecasts for economic growth;

The proposed housing requirement exceeds LHN and accounts for economic growth.

PPG identifies circumstances in which it may be appropriate to consider whether actual housing need is higher than the Standard Method indicates, stating:

"*[The Standard Method] does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic

Housing Market Assessment) are significantly greater than the outcome from the Standard Method. Authorities are encouraged to make as much use as possible of previously developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests." (NPPG Paragraph: 010 Reference ID: 2a-010-20201216)

The PPG specifies that these factors need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).

In accordance with the NPPF (2023) and relevant planning practice guidance, the Housing Study Update (HO09) tests a number of alternative scenarios to the Standard Method to determine whether there are exceptional circumstances in Central Lancashire to justify an alternative approach in the context of observed market signals and demographic trends.

To understand if housing need might be higher than that suggested by the Standard Method, in accordance with PPG, the Housing Study Update (HO09) therefore considered the following key demographic and market signal statistics for the three Central Lancashire authorities, including:

- Housing completion trends (net additional dwellings)
- Economic growth forecasts and the balance between labour demand and supply (including commuting flows)
- Total population change
- Population age profile change
- Components of population change since 2001, including:
- Natural change (births / deaths)
- Net internal migration (between Central Lancashire and elsewhere in the UK, and between the Central Lancashire authorities)
- Net international migration (migration to/from overseas)

The LHN figures were then considered within this wider demographic and economic context, using the latest population and employment growth statistics to establish whether the LHN represents an appropriate housing need figure for Central Lancashire or whether there was justification for a housing requirement which exceeds that set by the Standard Method.

A population and household forecasting tool called POPGROUP was used to develop a range of demographic scenarios for each of the Central Lancashire authorities. The reasonable alternative housing need scenarios that were tested, including those derived using the POPGROUP model, are summarised below (see also HO09, Appendix 1, Table 1).

These scenarios were run to 2041 and used the 2014-based household formation rates in line with the PPG (ID: 2a-005-20190220) which underpinned the NPPF (2023).

- **Standard Method (LHN) Baseline** – This scenario is Local Housing Need as calculated using the Standard Method for each authority.
- **SNPP Projections** – These scenarios replicate the government's 2014-based and 2018-based subnational population projections (SNPPs) using historical population evidence up to the base year and replicating the official projection thereafter.
- **POPGROUP Demographic Projections –** These demographic-led scenarios ('PG' scenarios) were based on a continuation of short-term (5-year), medium-term (10 years) and long-term (21-year) migration histories. The final PG-5yr-10yr scenario was based on a continuation of a 5-year internal migration trend combined with a 10-year international migration trend.
- **Employment-led Projection (Commuting Ratios held constant)** – This scenario uses employment forecasts (from Cambridge Econometrics) and assumes that existing estimated commuting ratios remain constant over the 2023 to 2041 projection period.
- **Employment-led Projection (1:1 commuting for new jobs)** – This scenario uses employment forecasts (from Cambridge Econometrics) and an assumed commuting ratio of 1:1 linked to net additional jobs growth. This assumes that for every new job created in a district, there is a resident worker available to fill it and no absolute change in levels of in-commuting or out-commuting.

The differences in outputs between the scenarios reflect the projected demographic change and consequences for household formation and equivalent dwelling numbers under the different assumptions employed.

For Central Lancashire as a whole, household growth outcomes were generally highest under the employment-led scenarios, which is a reflection of the higher levels of employment growth driving higher levels of net migration and changes to the population age structure than observed solely within demographic trend-based projections. Both employment-led scenarios resulted in dwelling growth outcomes that were higher than

LHN and the scenarios based on the official projections series (SNPP-2014 and SNPP-2018) (HO09, Table 15).

One of the inputs to the employment led scenarios is the Cambridge Econometrics employment forecast provided by the Local Enterprise Partnership. This forecast, together with economic activity rates based on the 2021 Census, is used to model the future labour force, population, and household growth profile as part of an employment-led housing growth scenario. The forecast reflects a positive economic outlook relative to past trends and is therefore considered to be a justified reflection of market signals and appropriate alternative to the Standard Method.

The employment forecasts used in the Housing Study Update (HO09) are the same forecasts as applied to the labour demand scenarios in the Central Lancashire Employment Land Study – Land Supply and OAN Update 2024 (BE Group, June 2024 (ER06)) so there is consistency across the evidence base.

As set out in HO09 (section 5(iv)), the extent to which the employment-led scenario would be responsive to future changes, any additional population growth and/or increases in actual labour demand, is impossible to measure precisely. However, a substantial degree of flexibility and robustness has been established by utilising the more recent lower Economic Activity Rates from the Census 2021. The assumptions for the 1:1 commuting ratio, also mean that while the outcomes of forecast growth may differ, the starting point for dwellings equivalent figures establishes more sustainable patterns of development, in terms of the relationship between jobs and homes.

As economic activity rates are forecast to increase, in principle, the dwelling-equivalent figures for the employment-led scenarios could support higher jobs growth. This is an important source of potential flexibility, particularly in respect of the ability to accommodate other known employment-generating developments, which it has not been possible to directly input into the modelling.

The main employment-led scenario has a dwelling growth output of 1,275 dpa and the employment-led (CR 1-to-1) scenario which incorporates the 1:1 commuting ratio sensitivity adjustment has a slightly lower output of 1,237 dpa (HO09, Table 15).

At a total of 1,237 dpa, the housing need presented in this scenario is higher than the LHN of 944 dpa but is better aligned with past levels of total housing delivery and forecast levels of employment growth, and as such accords with appropriate circumstances set out in PPG for justifying an alternative assessment of housing need that exceeds the result of the Standard Method. The housing requirement of 1,237 dpa

is therefore soundly justified by the evidence set out in the Housing Study Update (HO09).

Policy HS1 sets out that the housing requirement for Central Lancashire is 23,652 homes to be delivered over the period 2023 to 2041, which is an average of 1,314 homes per year. This figure is slightly higher than the requirement identified in the Housing Study Update (HO09) as it has been increased from 1,237 dpa in order to achieve 80% of the LHN using the new Standard Method formula (currently 1,687 dpa), in accordance with the transitional arrangements. The additional 77 dwellings per annum have been distributed between the three authorities.

c) Alignment of jobs and workers;

NPPG states that an affordability adjustment is applied when calculating housing need using the Standard Method because *"people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford"* (ID: Paragraph: 006 Reference ID: 2a-006-20190220). National policy and the Standard Method calculation therefore support the alignment of jobs and workers.

In developing the employment-led scenario, a commuting ratio sensitivity has also been applied. This sensitivity applies an adjustment to the Census-based commuting ratio in each year of the forecast so that future jobs growth is provided under a 1:1 commuting ratio. This assumed that for every new 'job' created in the relevant area, there is a resident worker available to fill it i.e., each Central Lancashire authority provides 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 1:1 scenario assumes that additional homes will be needed in the districts where additional jobs are created. In other words, the scenario assumes that all future employees will either need housing in the district where they work or already live there (i.e. there will be a sufficient resident workforce to support the jobs growth forecast by Cambridge Econometrics (CE)) (HO09, paragraph 5.26).

In practice, this assumes that each Central Lancashire authority provides sufficient growth in the resident labour force (adjusted for unemployment rates) so an increase in the number of jobs is matched on a 1:1 basis by the increase in resident workers in each constituent area. This scenario therefore assumes no change in absolute levels of in-commuting or out-commuting alongside meeting the forecast additional jobs growth

(which otherwise occurs when commuting ratios are held constant). This is further explained in paragraphs 5.30 and 5.31 of HO09.

The 1:1 employment-led scenario principally affects the location of homes relative to jobs in Central Lancashire by seeking to provide homes closer to workplace locations in accordance with the principles of the Standard Method.

d) Assumptions of housing requirements arising from economic growth?

The NPPF (2023) states that plans should *"provide a positive vision for the future of each area"* (paragraph 15) and should *"be prepared positively, in a way that is aspirational but deliverable"* (paragraph 16) and should make sufficient provision for both housing (including affordable housing) and employment (paragraph 20(a)).

At a total of 1,237 dpa, the housing need presented in the chosen employment-led 1-to-1 scenario responds effectively to forecast levels of economic growth and provides an important source of flexibility, particularly if economic activity rates were to increase in the future.

The identified level of housing need is therefore higher than the baseline LHN scenario of 944 dpa but is better aligned with past levels of total housing delivery and forecast levels of employment growth, and as such accords with appropriate circumstances set out in NPPG for justifying an alternative assessment of housing need that exceeds the result of the Standard Method.

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?

The 'Approach to housing need and redistribution' Topic Paper (TP01) sets out how the requirements of each authority were arrived at. Broadly, this details how the CLAs used the employment-led (CR-1-to-1) scenario, recommended within the Housing Study Update (HO09) as a basis ('policy off'). Numerous factors including the Spatial Strategy, environmental designations and housing supply were then considered to inform the distribution of the requirement identified within HO09 ('policy on'). Options were tested within the Integrated Appraisal (CD05), summarised within paras 6.40-6.53. As detailed in 3.1b), a small uplift was the applied to the overall housing requirement. This small uplift was distributed between the authorities in a similar ('policy on') way. This

included incorporating a stepped requirement in Chorley, recognising that some sites within Chorley will deliver later in the plan period. Taken in the round, the proposed requirements will meet the needs of each authority.

As each Council has a separate housing requirement, each Council will continue to monitor their five-year housing land supply separately. Consequently, even if a failure to supply housing in one authority is assumed, it will not impact on the five-year housing land supply in the other two Council areas.

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?

In relation to Affordable Housing Needs, is the identified need for 438 dpa based on robust, up-to-date information?

The Housing Demand and Need Assessments 2024 (HO10, HO11 and HO12) (HDNAs) set out a robust assessment of affordable housing need based on up to date information for each authority. The HDNAs set out a transparent and robust methodology using a range of up-to-date sources of information to identify a figure for affordable housing need. The methodology is set out (Step A, B and C) within the HDNAs and indicate the concluding figures in tables (Tables C7 and C9 in each HDNA). The data used to inform each study's assumptions varies depending upon type of housing explored, delivery and approach to addressing the backlog. Where the use of particular data is prescribed by PPG (Housing and Economic Needs Assessment – Affordable Housing), this has been used to inform each HDNA.

The aim of the analysis in the HDNAs, was to secure a reasonable assessment of affordable need based on available data. As the range of data sources varied across the authorities, care was taken to ensure that the assessment was proportionate and took into account available evidence on the overall scale of need, supply, and a reasonable timescale for clearing the backlog of need.

The needs evidence for Chorley Council and Preston Council, included a household survey (a household survey was not carried out for South Ribble Council). The results were used alongside other data including the housing register data. A proportionate and pragmatic approach was taken, the household surveys and the housing register data formed part of the wider calculation resulting in robust figure.

It should be noted that the housing register data used within the HDNAs included Band D. While Band D indicated some sort of housing need it incorporated categories that did not meet the statutory guidelines for an identified housing need. If Band D (applicants which do not meet the statutory guidelines) were to be removed from the housing register data, this would have an impact on the overall figure.

Disparity Between Housing Needs Identified in the Housing Register			
	Chorley	Preston	South Ribble
Housing Register August 2025 (Band A-C)	633	1,321	684
Housing Register September 2024 (Band A-D) (HDNAs)	2,100	8,932	2,209

The total affordable housing need was then considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments.

When considering the clearance of the backlog, a period of 10 years was assumed for Chorley Council and Preston Council and 5 years for South Ribble. This assumption considered the data sources used and the track record of the supply of affordable housing. Use of a 10-year clearance in South Ribble would have resulted in a very low net housing need figure. A 5-year period was therefore used to ensure that the resultant figure was robust.

Backlog Clearance for South Ribble	
5-Year Clearance Rate	146
10-Year Clearance Rate	-68

As part of the overall affordable needs modelling, pipeline newbuild is carefully considered and referenced in the HDNAs. The way pipeline supply was considered does vary by local authority. This produced a net of residual housing need figure (the need once planned delivery has been factored in, in accordance with the PPG.

The affordable housing need taking into account newbuild supply is indicated at Table C9 of each of the HDNAs as follows:

	Chorley	Preston	South Ribble	CLAs Total
Clearance of Backlog	10 years	10 years	5 years	
Annual Net Need (including New Build Supply)	53	130	146	329

The resulting net/residual affordable housing need was carefully considered, in accordance with the PPG, to determine the appropriate affordable housing need figure to be referred to in the CLLP. A cautious approach was used.

For Preston Council and South Ribble Council, new build supply was included; for Chorley Council new build delivery was excluded. The reason for this was a pragmatic one – for Preston Council and South Ribble Council the overall scale of pipeline provision relative to need was reasonable and would not impact on the scale of affordable housing required through affordable housing policies. However, across Chorley Council there is a particularly strong affordable pipeline supply in the short term. This will therefore make considerable inroads into meeting identified affordable need in the short term. As the HDNAs and CLLP consider need over the longer term. If the modelling incorporated the high level of pipeline delivery over the short-term, this would supress the level of net/residual affordable housing needed over the longer-term. The decision was therefore taken to exclude new build supply figures from the overall need figure for Chorley Council but include them for Preston Council and South Ribble Council. The resulting figures referred to within the CLLP are as follows:

	Chorley (para 4.57)	Preston (para 4.58)	South Ribble (para 4.59)	CLAs Total
Affordable Housing Need Figures within the CLLP	160	130	146	438

As can be seen from the figures in the tables above and within Table C9 of the HDNAs, the overall affordable housing need figure, as calculated in accordance with the PPG is based on a cautious and pragmatic approach that results in a robust figure.

If the Inspector considers it necessary, the CLAs are open to clarifying that the affordable housing need figures in the CLLP refer to the net/residual affordable housing need (Preston/South Ribble – including new build, Chorley – excluding new build).

How has this been considered in the overall housing requirement?

Policy HS7 - Affordable Housing, requires an appropriate level of affordable delivery on different types of housing site to significantly contribute to meeting the identified need. This is the maximum level of affordable housing found viable within the Central Lancashire Local Plan Viability Report (IT05).

It is not expected that all the identified need is met through the provision of a proportion on developer-led sites. The CLAs have actions in place to boost the delivery of affordable homes and address any residual affordable housing need. These are outlined at section 6 of the Affordable Housing Topic Paper (TP06). The CLAs have a good track record of delivering 100% affordable housing schemes without allocations. A significant number of affordable homes are expected to be delivered across the CLLP area by Registered Providers, where up to 100% of the dwellings will be affordable. No further uplift to the housing requirement is therefore necessary.

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?

The Lancashire Growth Plan (LGP) (CL04a) seeks to set out a framework for economic growth in Lancashire. The Lancashire Combined County Authority (LCCA) published a draft LGP for public consultation in March 2025 and, following consideration of comments, a final plan was published in September 2025 (note that the finalised LGP omitted Cuerdale Garden Village from its list of 'complimentary sites' (see LGP Appendix B (CLA04b)). The CLLP and evidence base was therefore completed before a draft or final version of this regional growth strategy was published.

Nonetheless, it is important to highlight that both the CLLP and LGP are informed by similar economic modelling. Page 13 of the LGP cites the Lancashire Independent Economic Review (2022) as a key source, which is also listed within the CLLP evidence base (ER04). This report is informed by economic forecasts developed by the Lancashire Local Enterprise Partnership (LEP) by Cambridge Econometrics (see ER04 p18), which also informed the Housing Study Update's (HO09) 'Employment led scenarios' and the Central Lancashire Employment Land Study - Land Supply and OAN Update 2024 (ER06a) (see answer to Question 3.1b).

Appendix A of the LGP identifies several transformational projects, including two within Central Lancashire: Samlesbury Enterprise Zone (SEZ) and Preston Station Quarter (PSQ). SEZ is already a designated employment site (in the adopted South Ribble Local

Plan (2015)), within which the planning approval process has been simplified by a Local Development Order. PSQ is a city centre regeneration project reflecting the CLLP's vision, with the plan identifying several city centre locations for housing growth to support this.

LGP Appendix A also notes that the SEZ is intended to enable transformational economic growth for the whole of Lancashire and cites the location of the National Cyber Force (NCF) at the SEZ as an opportunity to harness new corporates, SMEs, and talent. It states at page 29, that the NCF HQ will support around 2,000 personnel and generate an estimated 3,120 direct and indirect jobs. The LGP places significant focus on the NCF in supporting economic growth across Lancashire, including through the development of 'cyber corridors.' The CLAs are aware of the importance of the NCF and are supportive of the economic and skills growth it will bring to the region.

Through the Regulation 19 consultation, numerous representations have been received (A53.2, A54.2, A27, A55.3, A60.5, D03.5, A36.3, D03.6 and A36.2) arguing that the plan has failed to consider the NCF in its forecasts. The CLAs dispute this and have prepared a National Cyber Force Topic Paper, detailing how the NCF has been considered though the plan. This is provided as an Appendix to the MIQs. Ultimately, whilst supportive of the NCF and the opportunities it can deliver, the CLAs consider there is currently insufficient evidence relating to the scale, nature, or geographic distribution of NCF related growth. The CLLP proposes a range of employment sites that are suitable to sustainably accommodate cyber-related businesses, consistent with the priorities of the CLLP – including through the SEZ and PSQ.

The topic paper confirms that there is presently no evidence to infer any impact on housing need. The Central Lancashire Authorities have been in contact with personnel from National Cyber Force and they have advised as follows:

The National Cyber Force (NCF) does not provide comment on exact figures regarding staff numbers for national security reasons. We have previously provided approximations of workforce size through publicly available sources, which remain the most appropriate reference for such information.

However, our publication, Responsible Cyber Power in Practice states that once the currently planned growth is complete, we will be made up of a roughly equal share of personnel from the MOD and the intelligence agencies. The NCF is investing in both military and civilian recruitment, including our recruitment pipelines, by creating dedicated cyber career pathways to build a world class workforce to ensure the NCF can operate at scale.

The NCF anticipates that many of the future jobs, both direct and indirect, will be filled from local recruitment of people already resident in the area and that the growth in housing demand linked to the NCF will follow normal patterns of housing demand for employers of a similar scale.

Section 5 of the LGP sets out the LCCA's ambition to prepare a Spatial Development Strategy (SDS). This will be duty placed upon the LCCA once the Planning and Infrastructure Bill is enacted (as currently drafted). It is expected that SDS' will ultimately be responsible for determining and distributing housing and employment needs. Whilst the ambitions of the LGP are noted, its evidence base is much more limited than evidence that would underpin a true SDS. Consequently, it is under this forthcoming planning framework where regional growth is best explored and planned for.

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

The Housing Demand and Need Assessments (HDNA's) for each Council (HO10, HO11 and HO12) considers the needs of older people and specialist housing needs. It would be anticipated that some of the C3 dwellings delivered would be appropriate for older people and specialist housing needs. The overall 1,314dpa need takes into account the underlying demographics of Central Lancashire and therefore will take these needs into account. The HDNAs (Table 4.4 in each HDNA) identified a Central Lancashire annual need for 339 C3 older person specialist dwellings (specifically leasehold sheltered) which can be considered as part of the overall housing need plus 98 Extra Care units (which can be C2 or C3 use type) and sufficient C2 residential care units. Most of the C3 need is for leasehold properties (88%) and the remainder affordable rented (12%).

Regarding specialist housing need, the HDNA's identify a need for other forms of specialist housing in line with paragraph 63 of the NPPF (2023/2024) including for those with disabilities, looked after children and in Preston, a need is also identified for meeting the needs of ethnic communities. However, it is anticipated that most of these needs would be met through mainstream housing, with adaptation, help and support where necessary. Additionally, the CLLP does make provision for community-led development to meet specific needs (Policy HS12 Specialist Housing).

It should also be noted that the need for larger (4 or more bedroom) properties to meet the cultural needs of specific communities was highlighted in the Preston HDNA which is reflected in Policy HS6 Housing Mix and density through the requirement at criterion 1(a) to "provide a mix of dwelling types and sizes to address the needs for that location

as Identified in the Housing Need and Demand Assessments". In support of this, the HDNA for Preston (HO11) references the work undertaken by Preston City Council through engagement with the Preston Asian Housing Engagement Group and how this led to the council seeking an update to the HDNA, to recognise the specific requirements of this community. A mix of housing to meet the needs of this community arising from this work is also included within supporting text paragraph 4.97 to Policy HS12.

Additional evidence has been prepared to enable the consideration of the need for purpose-built student accommodation in Preston (HO19) and also in assessing the need for travellers (HO01, HO06 and HO13). These documents have also fed into the development of each Council's HDNA. The requirements for these specific housing types are dealt with through Policies HS13: Gypsy, Traveller and Travelling Showpersons Needs and under policy EC10: University of Lancashire for student accommodation.

Further details regarding specialist housing can be found in answer to Question 7.8.

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?

Paragraph 67 of the NPPF (2023) (paragraph 69 of the NPPF (2024)) relates to strategic policy-making authorities establishing housing requirement figures for their whole area. Within this overall requirement, the NPPF states that "strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development, and any relevant allocations." Paragraph 68 continues to say that *"where it is not possible to provide a requirement figure for a neighbourhood area, the LPA should provide an indicative figure, if requested to do so by the neighbourhood planning body…".*

The CLAs have explained through Question 3(b) of the Inspector's Initial Questions (CLA03) why the CLLP does not include a housing requirement for designated neighbourhood areas in Central Lancashire; namely because of one or more of the following reasons:

- the groups/parish council have not requested a figure,
- they have confirmed they do not intend to propose allocations in their plans,
- they have confirmed they no longer wish to progress a neighbourhood plan,

- there is no land deemed suitable and in accordance with the CLLP's spatial strategy for development in the designated area,
- strategic sites are allocated within the Neighbourhood Area and sufficient housing is allocated through the delivery of those sites,
- recent permissions in the Neighbourhood Area are considered sufficient to meet the area's need.