

# SUPPLEMENTAL STATEMENT OF EVIDENCE

## HOUSING LAND SUPPLY

APPEAL A - APP/D2320/W/21/3284692  
LAND AT CARRINGTON ROAD, ADLINGTON

APPEAL B - APP/D2320/W/21/3284702  
LAND SOUTH OF PARR LANE, ECCLESTON

This Supplemental Statement has been prepared on behalf of the Appellants in response to the Inspector's questions raised in email (dated 21<sup>st</sup> December 2021) following the Case Management Conference. Further information from the Council was required to respond to the Inspector's questions and this was received on 13<sup>th</sup> January 2022.

### 1) The base date from which the calculation of the housing requirement commenced

The base date of the housing requirement is 1st April 2010 as stipulated under Policy 4 of the Central Lancashire Core Strategy which sets out a minimum, annual housing requirement for the Borough over the period 2010 – 2026. Policy 4 sets out a *minimum per annum* requirement of 417 dpa.

### 2) Details of the annual delivery of housing units since the base date compared to the development plan housing trajectory i.e. when did the oversupply take place and details of the trajectory going forward to the end of the plan period

These details are already presented in Table 6 (Summary of Net Housing Completions in Chorley against the Trajectory) of my Proof of Evidence on Housing Land Supply along with my analysis (Paras. 4.12 – 4.14). I have repeated in this Supplemental Statement in order to consolidate this evidence for the Inspector's reference.

Year	Net Housing Completions	Appellant's Forecast Completions	Projected Completions in CLP Trajectory	Difference (+/-)	Cumulative Difference
2010/11	527	527	527	0	0
2011/12	552	552	552	0	0
2012/13	638	638	513	125	125
2013/14	582	582	579	3	128
2014/15	723	723	758	-35	93
2015/16	597	597	779	-182	-89
2016/17	517	517	617	-100	-189
2017/18	661	661	463	198	9
2018/19	573	573	469	104	113
2019/20	640	640	445	195	308
2020/21	306	306	334	-28	280
2021/22	401*	433**	279	122	402
2022/23	380	337	259	121	523
2023/24	330	329	259	71	594
2024/25	191	153	223	-32	562
2025/26	202	136	132	70	632
<b>Total</b>	<b>7,820</b>	<b>7,704</b>	<b>7,188</b>	<b>632</b>	<b>632</b>

\*Forecasted completions from 2021-26 based on Council's updated Five Year Supply and delivery in CD6.15

\*\* Forecasted completions from 2021-26 based on Appellant's Five Year Supply position and delivery in CD6.15

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Table 6 shows that housing delivery has broadly stayed on track with the trajectory with year on year fluctuations; there have been years where delivery was below the trajectory, and years where it exceeded the trajectory. If the Inspector was to accept the Council's evidence in full then the deliverable supply is projected to be an exceedance of 632 dwellings by the end of the plan period.

When set against the annual requirement to deliver a minimum of 417dpa over a 15 year plan period, this 632 dwellings equates to an exceedance of just 9%<sup>1</sup> against the Trajectory.

In the context of quantitative delivery, the Council have been delivering total housing as required, yet as their projected completions suggest (from 2021/22 onwards) this will fail to deliver anywhere near the level previously achieved in the plan period and well below the annual, minimum housing requirement set under CS Policy 4. This is particularly significant as it risks undermining early delivery of the emerging Local Plan (a point I consider further in Paras. 4.58 – 4.62 of my proof) as well as delaying homes that the latest evidence makes clear are needed now. As the words of Inspector Young on the appeal at Oxford Brookes University<sup>2</sup> stated *"It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses..."*.

### **3) What does the oversupply comprise? Were the housing units provided over the annualised housing requirement since the base date the result of (a) development plan allocations being brought forward quicker than the trajectory anticipated, (b) development plan allocations producing more housing units than the allocation anticipated and or (c) were they the result of unexpected windfall developments?**

This evidence has already been set out in the form of a detailed spreadsheet in Appendix 3 of my Proof of Evidence which I would draw the Inspector's attention to alongside this analysis.

Noting the base date of the Core Strategy (adopted July 2012) housing requirement is 2010, completions between 2010 – 2012 prior to the Chorley Local Plan were rightly taken into account. The Chorley Local Plan was subsequently adopted in 2015 and therefore in order to understand the reasons for an 'oversupply' and its composition, this analysis looks at the performance of the Local Plan between the 2012 – 2021.

The key observations are as follows:

- In addition to the Buckshaw Village Strategic Site, the following sites were consented prior to 2012 and the adoption of the Chorley Local Plan but subsequently rolled forward as committed site allocations in order to support early housing delivery in the plan period to meet needs.
  - HS1.1 Eaves Green, off Lower Burgh Lane
  - HS1.2 Carr Lane (Vertex Site)
  - HS1.3 Former Lex Auto Logistics Site Pilling Lane
  - HS1.6 Crosse Hall Mill Farm

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<sup>1</sup> 632/ 6834 (CS Policy 4 requirement 2010-26 + prior under provision) x 100 = 9.2%

<sup>2</sup> CD8.27, para 13.101

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- HS1.10 Gillibrand
  - HS1.12 Park Mills, Deighton Road
  - HS1.23 Grove Farm, Railway Road
  - HS1.28 Radburn Works, Sandy Lane
  - HS1.41 37-41 Wigan Road
  - HS1.45 202 Chorley Old Road
  - HS1.47 Land Adjacent 32 Moor Road, Croston
  - HS1.51 Sagar House, Langton Brow, Ecclestone
- This approach will also be required beyond the current plan period (2026) and to support the emerging Central Lancashire Local Plan, a role which the appeal sites could help deliver on.
  - Housing allocations delivered a **shortfall of 212 dwellings** between the period of 2012 – 2021 than anticipated in the Trajectory.
  - While the Trajectory anticipates greater housing delivery in the plan period, **housing allocations have failed to deliver as planned resulting in a total of 441 fewer dwellings being built between 2012-21**. A total of 250 less dwellings were built between 2012 – 2016 and 191 fewer dwellings between 2016-21.
  - **A total of 703 dwellings from housing allocations still remain undelivered** over the plan period from the following sites – a significant 12.5% slippage on the delivery of all allocations<sup>3</sup>:

### Allocated sites with permission

- HS1.7 – Talbot Mill, Froom Street (149 dwellings)
  - HS1.8 – Botany Bay/Great Knowley, Blackburn Road (288 dwellings)
  - HS1.43A – Land adjacent to Lady Cross Drive (12 dwellings)
  - HS1.53 – JF Electrical, Little Quarry, Hill Top Lane (85 dwellings)
- Total = 534 dwellings

### Allocated sites without permission

- HS1.26 - Fairport, Market Place (31 dwellings)
  - HS1.17 – Cabbage Hall Fields (11 dwellings)
  - HS1.19 – Land adjacent to Northgate (21 dwellings)
  - HS1.29 – Westwood Road (23 dwellings)
  - HS1.34 – Regent Street (22 dwellings)
  - HS1.38 – Mountain Road (22 dwellings)
  - HS1.46 – Land at Drinkwater Farm, Windsor Drive (10 dwellings)
  - HS1.62 – Pole Green Nurseries (29 dwellings)
- Total = 169 dwellings

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<sup>3</sup> 703 / 5,607 (taken from Policy HS1 Table) x 100 = 12.5%

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- As noted the overall delivery of housing allocations has fallen short against the Trajectory, this is despite a net increase in development yields/ densities achieved on some sites – most notably driven by a further 202 dwellings at Buckshaw Village.
- Windfall development makes up the majority proportion of the total ‘oversupply’. The number of dwellings arising from windfall development are as follows:
  - 800 homes between 2010 – 2021 (51% of total ‘oversupply’<sup>4</sup>)
  - 550 homes between 2012 – 2021 (37% of ‘oversupply’ between this period<sup>5</sup>)
- This represents a key factor in explaining why the Council have consistently failed to deliver against their affordable housing requirements for the Borough over the plan period. The threshold for requiring affordable housing is above 15 dwellings in urban areas and above 5 dwellings in rural areas. Analysis of the latest Housing Land Monitor<sup>6</sup> shows that of the 306 dwellings completed in 2020/21, 301 of these (98%) were sites of less than 15 dwellings (i.e. below the threshold to deliver affordable). This is not a sustainable position for the Council to maintain in the context of a worsening affordable delivery track record and the development plan imperative to “significantly” increase affordable delivery.
- Looking ahead to the next five year period, and based on the Council’s own deliverable supply evidence, this reliance on windfall will continue to exacerbate to as high as 60% - 68% as illustrated below<sup>7</sup>:

Deliverable Supply	2021/22	2022/23	2023/24	2024/25	2025/26	Total
Allocations	252	144	106	69	88	659
Windfall	181	249	223	104	88	845
<b>Total Completions</b>	433	393	329	173	176	<b>1504</b>
<b>% Windfall</b>	42%	63%	68%	60%	50%	<b>56%</b>

The analysis confirms that over the plan period of the Chorley Local Plan, housing allocations have delivered a shortfall in dwelling numbers and at a slower rate than anticipated in the Trajectory. The ‘oversupply’ being argued by the Council comprises a significant quantum of windfall development and allocations delivering at greater development yields, most notably at Buckshaw Village.

This analysis shows that this exceedance has arisen more through coincidence of unexpected windfall than the performance of the Local Plan itself through its housing allocations. The evidence before this inquiry shows that the Local Plan has failed to deliver the affordable homes needed and this is likely to continue to worsen.

<sup>4</sup> 800 / 1,567 x 100 = 51%

<sup>5</sup> 550 / 1,484 x 100 = 37%

<sup>6</sup> CD6.23

<sup>7</sup> Figures taken from CD6.15 – Five Year Housing Land Supply Statement 2021

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### **4) An assessment of the general picture regarding housing land supply**

My Proof of Evidence addresses this matter in full, starting with a detailed chronology in national planning performs which have resulted in a significant change in circumstances to justify a departure from the Policy 4 housing requirement to the use of Standard Method. In this context, the RSS-based housing requirement underpinning Policy 4 (which adopts 2003-household projections) is plainly out of date.

The implications for allowing an 'oversupply' to suppress a forward looking housing requirement Chorley are also significant and wide-ranging to the Borough, particularly in terms of neglecting affordable housing needs and failing to meet up-to-date identified needs by use of the Standard Method and affordable needs identified in the ICENI report. These are housing needs that show a marked change from the Policy 4 requirement and could be met now. Further delay from the Council to bring forward an up-to-date plan will only delay those real people in need now.

The composition of this 'oversupply' has been interrogated further and shows that a number of housing allocations have failed to deliver as planned under the Chorley Local Plan (between 2012-21). While the Trajectory anticipated housing completions would be greater in the early parts of the plan period (i.e. 2012-21), allocations have failed to deliver in this period. There has subsequently been a significant reliance placed on increased delivery at Buckshaw Village and windfall development. We submit that the qualitative supply from windfall development, most of which is under the threshold for affordable, will fail to meet the objectives of the Local Plan.

This conclusion is reinforced under Paras. 4.41 – 4.47 of my Proof which sets out a brief qualitative assessment on the Council's deliverable supply. Most pertinent is the Council's sole focus on the delivery of market housing which intentionally relegates the importance of addressing affordable housing needs. The Council have consistently failed to meet such needs over the plan period, most likely due to a reliance on windfall sites that are unable to secure the type of benefits, such as affordable housing, arising from strategic residential development as is proposed under the appeal sites.

Taking all of the above factors into account, Section 6 of my Proof concludes that the housing land supply position in Chorley is **2.5 years**.