



**Matter 10 Housing Land
Supply**

Representations on behalf of
Richborough (ID 1609_2)

**Examination of The
Hyndburn 2040: Local
Plan (Strategic Policies)**

Hearing Statement

Matter 10 – Housing Land Supply

Submission on behalf of Richborough

Representor ID 1609_2



CONNOLLYS

August 2025

Report Drafted By	Report Checked By	Report Approved By
LG	DC	DC
22.08.2025	22.08.2025	26.08.2025

This document has been prepared by Connollys Planning & Development Limited trading as Connollys.

No part of this document may be reproduced without the prior written approval of Connollys.

Connollys
Kingfisher Business Centre
Burnley Road
Rossendale
Lancashire
BB4 8EQ

T: 01760 508010

CONTENTS

1.	INTRODUCTION	1
2.	MATTER 10 – HOUSING LAND SUPPLY	2
3.	MATTER 10 - CONCLUSIONS	7

1. INTRODUCTION

- 1.1 This Hearing Statement is submitted on behalf of Richborough in response to Matter 10 and supplements our previous submissions made at the Regulation 18 and 19 stages on behalf of Miller Homes.
- 1.2 Richborough now hold the controlling interest in the Land at Bell Lane Clayton-le-Moors, which we have consistently promoted for inclusion in the Local Plan as a housing allocation.

2. **MATTER 10 – HOUSING LAND SUPPLY**

ISSUE 10 : HAS THE PLAN BEEN POSITIVELY PREPARED AND IS IT JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY IN RESPECT OF ITS POLICIES AND PROPOSALS FOR THE DELIVERY OF HOUSING.

HOUSING LAND SUPPLY – DELIVERY

- 2.1 With reference to our Matter 8 Statement, our client asserts that the housing trajectory and supply components are fundamentally flawed, placing undue reliance on a single, complex strategic location at Huncoat Garden Village (HGV) and on a portfolio of sites with unresolved viability and infrastructure risks, many of which have been allocated for residential development for approaching 30 years without coming forward.
- 2.2 Consequently, the Plan does not provide sufficient early and middle-period capacity, particularly in the Principal Town, to sustain delivery or to protect the five-year housing land supply. It therefore fails to ‘significantly boost the supply of homes’ (NPPF para. 60). The remedy lies in diversifying supply across the Borough, including additional allocations in the Principal Town.

1. WHAT EVIDENCE IS THERE THAT THE MINIMUM HOUSING REQUIREMENT OF 194 DWELLINGS PER ANNUM WILL BE ACHIEVED BEARING IN MIND PAST DELIVERY RATES?

- 2.3 The Plan does not demonstrate, on the evidence, that 194 dwellings per annum (dpa) will be achieved. Past under-performance reflects site mix and infrastructure constraints rather than demand: our Reps. show that new-build homes in Hyndburn’s market areas absorb well when deliverable, serviceable sites are brought forward. The trajectory remains over-dependent on HGV and on brownfield sites with significant remediation and servicing issues. To be positively prepared, the Plan should rebalance towards early-delivery sites around the Principal Town, supported by realistic assumptions on lead-in, build-out and sales outlets. Our client’s site at Bell Lane is eminently capable of assisting in this regard.

2. THE HOUSING SUPPLY 2021–2040 IS MADE UP OF A NUMBER OF COMPONENTS AS SET OUT IN TABLE 7 OF HBC8.001.

A) IS THERE COMPELLING EVIDENCE THAT SMALL SITES (WINDFALLS) WILL BE A RELIABLE SOURCE OF SUPPLY AMOUNTING TO 280 DWELLINGS?

B) WHAT EVIDENCE IS THERE TO SUPPORT THE FIGURE OF 170 NEW DWELLINGS (10 DWELLINGS PER ANNUM) FROM HOUSING IN TOWN CENTRES/PERMITTED DEVELOPMENT ALLOWANCE?

C) IS IT APPROPRIATE FOR A LAPSE RATE/NON-IMPLEMENTATION RATE TO BE APPLIED TO SITES WITH PLANNING PERMISSION WHICH ARE EXPECTED TO BE DELIVERED DURING THE PLAN PERIOD?

D) SHOULD AN ALLOWANCE BE MADE TO INCREASE THE HOUSING REQUIREMENT TO PROVIDE A BUFFER?

2.4 a) Windfalls: A windfall allowance should be justified by a long-running trend of net small-site completions that excludes double-counting with allocations and extant permissions. If such evidence is not compelling, a reduced or no allowance should be adopted to avoid optimism bias.

2.5 b) Town centre/permitted development: The 170-dwelling allowance should be underpinned by a schedule of prior approvals and recent completions, with realistic conversion and implementation rates. Without this, the allowance risks overstating delivery.

2.6 c) Lapse/non-implementation: A lapse factor should be applied, reflecting local experience of permissions that do not commence, that deliver fewer units than consented or sites that are allocated for almost 30 years without being delivered. This is consistent with plan-wide realism and the need to protect the five-year supply.

2.7 d) Buffer: Our client supports an increased housing requirement for reasons consistently set out elsewhere. Rather than seeing it as a buffer, a more effective approach would be to simply increase the requirement and allocate additional sites providing certainty and reducing the Plan's reliance on single-site or infrastructure risk.

3. POLICY SP10 RECOGNISES THE IMPORTANT CONTRIBUTION OF HUNCOAT GARDEN VILLAGE TO HOUSING SUPPLY. IT CONTRIBUTES AROUND 1,500 HOMES OUT OF A PLAN REQUIREMENT OF 3,686 DWELLINGS. IS THERE OVER-RELIANCE ON THE DELIVERY OF THIS SITE? IF THE DEVELOPMENT OF THE SITE IS DELAYED AND IT CANNOT PROVIDE THE ANTICIPATED NUMBER OF DWELLINGS IN THE PLAN PERIOD, ARE CONTINGENCY MEASURES REQUIRED IN THE PLAN?

- 2.8 Yes. The Plan over-relies on HGV. Our Reps demonstrate that a only 3–5 year slippage in strategic infrastructure or land assembly would significantly depress in-period completions and threaten the five-year supply.
- 2.9 Huncoat Power Station was decommissioned and closed in 1984, with the cooling towers demolished in October 1988 and the remaining structures demolished in September 1990. Parts of the site now forming part of sites H12 and H13 were allocated for employment development in the 1996 Local Plan. No such development has come forward in almost 30 years. The Council’s solution is to now displace that failed employment allocation with housing allocations that face significant (and mainly unquantified) viability and delivery challenges.
- 2.10 The evidence suggests inevitable delay without contingency.
- 2.11 The Council’s response to the Inspector’s initial questions is illogical. The solution to parts of HGV failing to deliver is not found within HGV itself – a site that is failing to deliver due to challenging circumstances cannot address that problem by looking to other parts of the same site with the same challenging circumstances.
- 2.12 In view of the above, contingency is essential including:
- (i) re-profile HGV so that a realistic proportion is identified post-2040; and
 - (ii) allocating additional deliverable sites to provide early and mid-period resilience.

4. WHAT ASSUMPTIONS HAVE BEEN MADE TO INFORM THE TRAJECTORY FOR THE DELIVERY OF HOUSING SITES, IN TERMS OF LEAD-IN TIMES FOR GRANT OF FULL PLANNING PERMISSION, OUTLINE AND RESERVED MATTERS, AND CONDITIONS DISCHARGE; SITE OPENING UP AND PREPARATION; DWELLING BUILD-OUT RATES; PHASING; AND NUMBER OF SALES OUTLETS?

- 2.13 The trajectory should adopt evidence-based parameters: outline to first completion typically 18–24 months (scheme complexity dependent); reserved matters/conditions to first completion typically 6–12 months; initial build-out around 30–40 dpa per outlet increasing where market absorption allows; and multi-outlet phasing for larger phases. Abnormal costs, remediation and strategic utilities should extend assumptions accordingly. Our Reps recommend distinguishing single-outlet small sites from strategic phases and calibrating outlets/phasing to absorption and infrastructure.
- 2.14 In relation to the overall housing supply, trajectory and HGV, the assumptions are wildly optimistic. Many of the proposed allocations have been allocated for development for approaching 30years, without success, whilst national evidence suggest that such large sites such as HGV take 8 years from the grant of outline permission to deliver the first homes. HGV isn't even allocated, yet!

5. FOR CLARITY FOR DECISION-MAKERS, DEVELOPERS AND LOCAL COMMUNITIES SHOULD THE NEED FOR AFFORDABLE HOUSING OVER THE PLAN PERIOD BE CLEARLY SET OUT IN THE PLAN?

- 2.15 Yes. The quantified affordable housing need should be set out and cross-referenced to the latest evidence, with clarity on how it will be met across site types and value areas. Flexibility must be retained to reflect updates to the evidence base and to avoid prejudicing deliverability (NPPF para. 62).

12. IS THE COUNCIL ABLE TO DEMONSTRATE A FIVE-YEAR SUPPLY OF DELIVERABLE HOUSING SITES ON ADOPTION OF THE PLAN AND A ROLLING FIVE-YEAR SUPPLY THROUGHOUT THE PLAN PERIOD?

- 2.16 On current evidence the five-year supply is vulnerable to slippage at HGV and delays on, and the removal of, constrained sites from the supply. To demonstrate a robust five-year supply on adoption and on a rolling basis (NPPF para. 74), the Plan should (i) diversify with additional deliverable Principal

Town allocations; (ii) moderate HGV's Plan-period contribution to reflect programme risk; and (iii) adopt realistic lead-in and build-out assumptions.

3. MATTER 10 - CONCLUSIONS

- 3.1 The housing land supply position is such that the Plan is not positively prepared, justified or fully consistent with national policy. It over-relies on a single strategic location and on constrained sites, some of which have been allocated for housing development without success for several decades. The supply lacks sufficient early and middle-period capacity and applies policy burdens that conflict with the Plan's own viability evidence. The Plan will not, on the evidence, significantly boost the supply of homes (NPPF para. 60).
- 3.2 Our client therefore seeks the following modifications in order for the plan to be found "sound":
- (i) diversify supply by allocating additional deliverable small and medium sites, particularly in the Principal Town, to support early and mid-period delivery;
 - (ii) re-profile HGV to identify a realistic in-period quantum with the balance post-2040, supported by contingencies; and
 - (iii) adopt realistic trajectory parameters on lead-in, build-out and outlets.