



**Matter 3 Principle of
Green Belt Release**

Representations on behalf of
Richborough (ID 1609_2)

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

Hearing Statement

Matter 3 – Principle of Green Belt Release

Submission on behalf of Richborough

Representor ID 1609_2



CONNOLLYS

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1. INTRODUCTION

- 1.1 This Hearing Statement is submitted on behalf of Richborough in response to Matter 3 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 3 – PRINCIPLE OF GREEN BELT RELEASE**

ISSUE 3 - 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 GREEN BELT?

PRINCIPLE OF GREEN BELT RELEASE

VISION AND STRATEGIC OBJECTIVES

1. DO THE EXCEPTIONAL CIRCUMSTANCES, AS REQUIRED BY PARAGRAPHS 140 – 143 OF THE FRAMEWORK, EXIST TO JUSTIFY THE PROPOSED REVISIONS TO THE GREEN BELT BOUNDARY FOR ADDITIONAL LAND FOR HOUSING AND EMPLOYMENT?

- 2.1 Exceptional circumstances exist in Hyndburn to justify Green Belt review and release. The Borough's Green Belt boundaries were established many years ago, is tightly drawn, a significant proportion of the Borough lies within it. In addition, there is insufficient non-Green Belt land to meet identified needs and deliver the Plan's objectives. Our representations consistently justify and support Green Belt release in principle to facilitate sustainable growth, market rebalance and regeneration. This is consistent with NPPF (para.140–143).

2. HAS THE COUNCIL EXAMINED FULLY ALL REASONABLE OPTIONS FOR MEETING ITS IDENTIFIED NEEDS IN LINE WITH PARAGRAPH 141 OF THE FRAMEWORK?

- 2.2 In our view, reasonable options have not been fully examined. The Plan continues to rely heavily on inner-urban and brownfield sites that the Council's own evidence recognises are frequently challenging to deliver and often contingent on public funding. By contrast, the Bell Lane site at Clayton-le-Moors was discounted notwithstanding the Council's 2019 Green Belt Assessment (Arup) which categorises the relevant parcel (Parcel 70) as making only a weak contribution to Green Belt purposes. Our evidence shows the land is largely unconstrained, forms a logical rounding-off, and can accommodate around 150 dwellings. A proportionate examination of options should therefore include releasing weak-performing Green Belt at the Principal Town to diversify the portfolio and improve deliverability.

3. DO THE PROPOSED GREEN BELT REVISIONS ALIGN WITH THE SPATIAL STRATEGY AND PROMOTE SUSTAINABLE PATTERNS OF DEVELOPMENT (NPPF PARAGRAPH 142)?

- 2.3 Not adequately. The submitted distribution concentrates a very high proportion of housing growth at Huncoat Garden Village, creating a single-point delivery risk. Our representations identify that five Huncoat-related allocations account for around 60–62.5% of the Borough’s allocations, with approximately 1,500 dwellings expected within the Plan Period. To promote a sustainable pattern as envisaged by NPPF (para.142), the Plan should rebalance provision by allocating weak-performing Green Belt land in the Principal Town, such as our client’s site at Bell Lane, to secure early, market-attractive delivery close to services and public transport.

4. IS THE 2019 GREEN BELT ASSESSMENT METHODOLOGICALLY ROBUST AND DOES IT ADEQUATELY CONSIDER THE GREEN BELT PURPOSES?

- 2.4 At a high-level, parcel level the methodology is broadly robust. However, it is unrefined, particularly when considering the settlement edges and misses contained rounding-off opportunities. For our client’s site at Bell Lane, the Council’s assessment is that the site sits within a weakly performing larger parcel, whilst our site-specific assessment concludes that the land performs weakly against the Green Belt purposes, and has limited, contained effects on openness owing to strong perimeter features.
- 2.5 On that basis, releasing Bell Lane would be consistent with the evidence while securing a clear and defensible boundary.

5. ARE THE REVISED GREEN BELT BOUNDARIES CAPABLE OF ENDURING BEYOND THE PLAN PERIOD (NPPF PARAGRAPH 143)?

- 2.6 Only where they follow durable physical features. At Bell Lane the mature woodland belt to the north, together with Bell Lane/Burnley Road, define a clear, long-term boundary. Development here would represent logical rounding-off with no material harm to the wider openness of the Green Belt.

6. DO THE PROPOSED NEW AREAS OF GREEN BELT (10.5HA) MEET THE REQUIREMENTS OF NPPF PARAGRAPH 139, AND HAVE EXCEPTIONAL CIRCUMSTANCES BEEN DEMONSTRATED?

- 2.7 We make no site-specific objection to the principle, but any new Green Belt designation should be supported by clear evidence that it is strictly necessary, that boundaries will be capable of enduring, and that designation is the most appropriate mechanism when considered against reasonable alternatives, in accordance with NPPF (para. 139).

8. WHAT IS THE JUSTIFICATION FOR SAFEGUARDING LAND AT HUNCOAT (BEYOND THE PLAN PERIOD) FOR RESIDENTIAL DEVELOPMENT AND A RAIL FREIGHT INTERCHANGE?

- 2.8 Further safeguarding at Huncoat risks entrenching over-concentration at a complex strategic location with known infrastructure and viability dependencies. Our representations highlight historic slippage and show that a relatively modest delay of three to five years could reduce the in-period trajectory by around 150–300 dwellings. A more robust and balanced approach would phase Huncoat realistically and identify additional complimentary non-Huncoat allocations now, such as Bell Lane, to maintain a resilient five-year supply. The Local Plan is already over-reliant on Huncoat to deliver the majority of its new homes and to safeguard yet more land there adds further risk to the Plan being sound.

9. DOES THE PLAN SET OUT COMPENSATORY IMPROVEMENTS FOR GREEN BELT LOSS, AS REQUIRED BY NPPF PARAGRAPH 142?

- 2.9 The Plan should go further in specifying and securing compensatory improvements for land removed from the Green Belt. For Bell Lane, our landscape strategy proposes a linear park along the Green Belt interface, strengthened boundary planting, retention and enhancement of public rights of way with new permissive links to the canal, and a SuDS network designed for biodiversity net gain, together with improvements to canal-edge access. These measures would enhance the environmental quality and accessibility of the remaining Green Belt, in accordance with NPPF para. 142.

3. MATTER 3 - CONCLUSIONS

- 2.10 Exceptional circumstances for Green Belt release exist. However, the package of revisions is not fully justified or effective because it overlooks weak-performing Green Belt adjacent to the Principal Town and concentrates growth at Huncoat.
- 2.11 In order to be found sound the plan should:
- (i) allocate weak performing Green Belt sites, such our client's at Bell Lane, Clayton-le-Moors (weak Green Belt function; strong and enduring boundary),
 - (ii) rebalance the spatial distribution to reduce reliance on Huncoat and promote a sustainable pattern of development (NPPF para. 142), and
 - (iii) secure specific compensatory improvements to the remaining Green Belt (NPPF para.142).