



August 2025

Hyndburn 2040: Local Plan Written Statement to Inspector's Matters, Issues and Questions on behalf of Amy Slinger



Response to Hyndburn 2040: Local Plan – August 2025

Job No: 25/L/093

Version: 1

Prepared by: Stuart Booth MRTPI

Written Statement to MIQs

1.1. The comments below are made on behalf of our client, Mrs Amy Slinger, who has land interest in Accrington, part of which forms a draft allocation for housing in the Local Plan under Examination. The comments are provided in direct response to the Inspector’s Matters, Issues and Questions and follow on from written representations made to the Local Plan by our client at relevant periods during preparation of the Plan.

1.2. Written representations to the following matters below are made, which are set out in separate sections of the Statement:

Matter 2 – The Spatial Development Strategy

Matter 5 – Housing Requirement & Policies

Matter 8 – Housing Allocations

Matter 10 – Housing Land Supply

Matter 2 The Vision and Spatial Development Strategy

Issue 2.1: Is the Plan's overall vision and strategy positively prepared, justified, effective and consistent with national policy in enabling the delivery of sustainable development.

Question 8.

Are the settlement boundaries illustrated on the Policies Map justified?

Response

- 1.3. Our client fully supports that the Settlement boundaries have been drawn around existing settlements and also around those site allocations proposed in the Plan (including H7) on the edges of the boundary. This means that upon completion of development the new developed areas will already be located within the settlement.

- 1.4. Our clients previous submissions to the Local Plan have advocated for the allocation to include additional land to the east of the site, providing a more defined urban boundary upon completion of development, and making good use of land. The boundary chosen by the Council as the new urban edge, with the allocation of land to the west, is a somewhat arbitrary line drawn on a top down 2 dimensional map, rather than a reflection of the merits of the site as a potential urban extension. Allowing for allocation of the wider area of our client's landownership would provide more options for a potential future settlement boundary to address the requirements in the allocation, whilst providing a suitable number of homes to meet need and be a viable development.

Matter 5 Housing Requirement and Housing Policies SP10, SP11 and SP12

Issue 5.1: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in meeting the housing needs of all groups in Hyndburn over the plan period?

Question 1.

The housing requirement set out in the Plan is an average of 194 dwellings per annum, much higher than the figure calculated using the standard method. Is this positively prepared, justified by proportionate up to date evidence and consistent with national planning policy?

Response

- 1.5. Our client supports the Council's approach to housing, which provides a very robust housing requirement to support future development growth. The housing requirement is higher than that calculated by the standard method, and whilst the Council will set out their own justifications for this during the Examination, our client notes that the standard method for calculating housing has changed drastically during preparation of the Plan, brought about by changes in approach of the national government. The iteration of methodology used for this Examination is a figure significantly reduced from the level of housing previously developed in the area. Our client supports the Council's balanced approach in not using that reduced figure, which would have significantly reduced housebuilding and impacted on the spatial development and longer term vision of the borough.

Matter 8 Housing Allocations

Issue 8.1 Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its housing allocations for Hyndburn?

Policy HP3 Land N of Sandy Lane (H9)

Question 11.

Are the development requirements set out in the policy justified and effectively worded?

Response

- 1.6. The development requirements set out in Policy HP3: Land N of Sandy Lane (H7) are quite precise, however our client would take issue with the wording of the Policy if the intention is that proposals that do not match the requirements exactly will be refused. There is a risk that allocations with too many defined 'requirements' may limit the development to such a degree that it reduces the likelihood of the development happening or reduces the number of potential developers willing to develop the site. An allocation that does not result in development is not effectively worded.
- 1.7. Our client would suggest that a clearer statement is made in the policy wording that the bullet points are considerations subject to planning, rather than strict policy requirements that may result in refusal of an application if not met. Further to this, our client has suggested increasing the size of this allocation. Doing so would allow for more certainty that development requirements can be met, as more land is available for design elements to be factored in and provide a well-defined boundary to the settlement.

Question 12.

Is the site allocation soundly based; and is there evidence that the development is viable, deliverable/developable and that there is a realistic prospect that it will come forward in the timescales indicated in the Council's trajectory (H016).

Response

- 1.8. Our client owns the site and has consistently presented it to the Local Plan as it emerged. They have undertaken pre-application discussions with the Highways Authority to demonstrate an achievably designed access and pre-application discussions with the Council were considered previously, with recommendations that an application would be refused until such time that the site was allocated for development through the Local Plan.
- 1.9. The land is currently farmed, but there are no restrictions on the lease of the land that would prevent its development upon allocation.
- 1.10. The site has been a family owned site actively promoted by our client as a potential allocation throughout the emergence of the plan and they continue to do so, seeking allocation of more of the site than set out in Policy HP3. They have received keen developer interest and been actively engaging with potential developers, and intend to submit an application upon allocation of the site in the adopted plan. Access and development rights exist for the land and potential constraints can be mitigated through design of a scheme.
- 1.11. Our client presents the site as viable, deliverable and developable.

Question 13.

Is Sandy Lane an appropriate access for a residential development? What impact will the necessary highway improvement works have on the character and heritage value of this ancient lane?

Response

- 1.12. Our client undertook pre-applications discussions with the County on Highway matters previously using the attached Plan (Appendix A) which showed a potential access into the site from Sandy Lane, with sufficient width to serve a larger development than that proposed in the Local Plan, and which the County agreed was acceptable in design terms.
- 1.13. The site lies adjacent to the existing urban area and would be accessed from the roundabout on Sandy Lane. Sandy lane runs through the urban area from Adelaide Street to the west, adjacent Manchester Road (A680), and directly serves as the access road to Accrington and Rossendale College, St Annes and St Joseph's Primary School and housing areas in this part of Accrington.
- 1.14. The proposed access would provide improvements to the existing road from the Sandy Lane roundabout that currently serves the Primary School rear staff car park, with a two-way road including a footpath adjacent the roadway along Sandy Lane until it enters the site. This part of Sandy Lane is currently a right of way that provides existing vehicular access to a number of existing residential properties along Sandy Lane, and includes farms and an equestrian centre along its length, which actually extends to the A56 to the west.
- 1.15. The indicative highway design shows a new main access into the proposed site directly from Sandy Lane, with this new access serving the site being approximately 8 metres back from the existing rear fence boundary of the existing properties on Austwick Way. There is sufficient width for an improved roadway to be provided to this new access point, shown as being between the existing boundary lines of the properties on Austwick Way to the north and land

to the south. This is considered an acceptable upgrade to the road to provide for a 5.5 width road along the existing route of Sandy Lane, extending just 8 metres beyond the existing settlement boundary of properties on Austwick Way.

- 1.16. To provide context to the access proposals on the lane, the plans at Appendix B (from Mario Maps) shows the distance the new access is from the existing urban boundary (the short red line), to the rear of Austwick Way. On the larger map this also shows this in the context of the length of Sandy Lane up to the A56. Bearing in mind that much of Sandy Lane is already within the urban area, this additional length is insignificant. The character of the lane will not change beyond that needed to access the site, and in the context of the length of the lane this change will be very minimal.

Question 14.

In part ii) the policy suggests that an alternative access to Sandy Lane should be investigated. Is access from Austwick Way achievable?

Response

- 1.17. This has been considered by our client, but it is considered that the existing width of Austwick Way, which has no pedestrian footpaths, could provide limited options for future development access to suitable standards. An option for the route as an alternative emergency access could be considered if necessary.

Question 15.

What is the justification for the proposed modification to remove part iii) of the policy relating to archaeology?

Response

- 1.18. Our client considers that these matters would be dealt with via the planning application in any event and therefore do not need to form part of the policy.

Question 15.

How have the landscape and visual amenity implications of development on this site been considered? What is the justification for the restriction of development above the 200m contour line in part vii) of the Policy?

Response

- 1.19. As set out in our client's comments previously, we do not consider there to be a need to specify this limitation, and indeed our client seeks additional land for allocation in the Local Plan. Removal of this part of the policy and extension of the allocation will allow any subsequent planning application to be considered based on the merits of the application and a direct review of the visual and landscape impacts from the specific development proposed at that time. Limiting the size of the allocation to that currently proposed, and further limiting this through policy on development above a certain contour line risks the allocation become undeliverable during the plan period due to excessive restrictions that could be suitably dealt with via a planning application.

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.

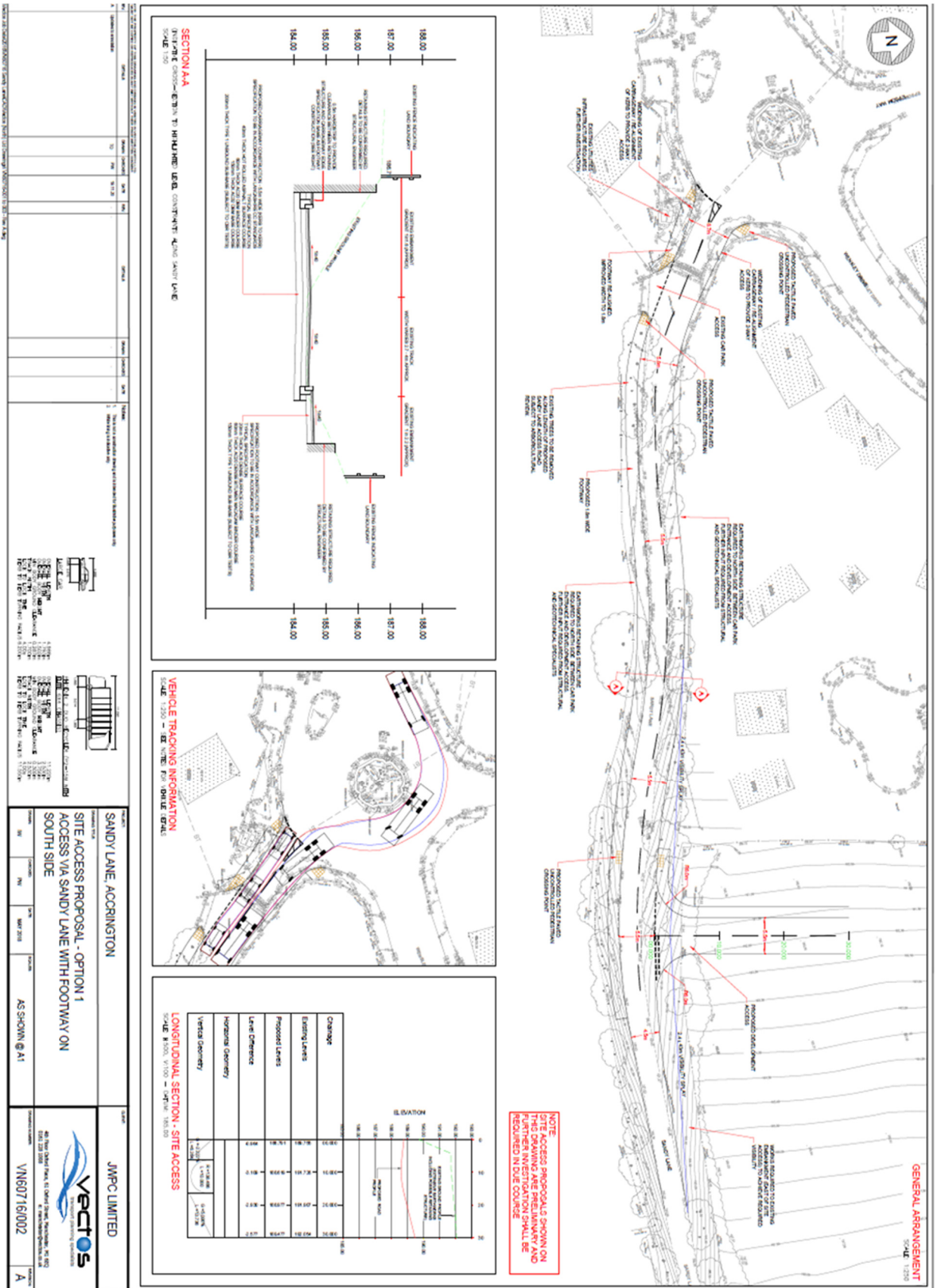
Question 3

Policy SP10 recognises the important contribution of Huncoat Garden Village to housing supply. It contributes around 1500 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?

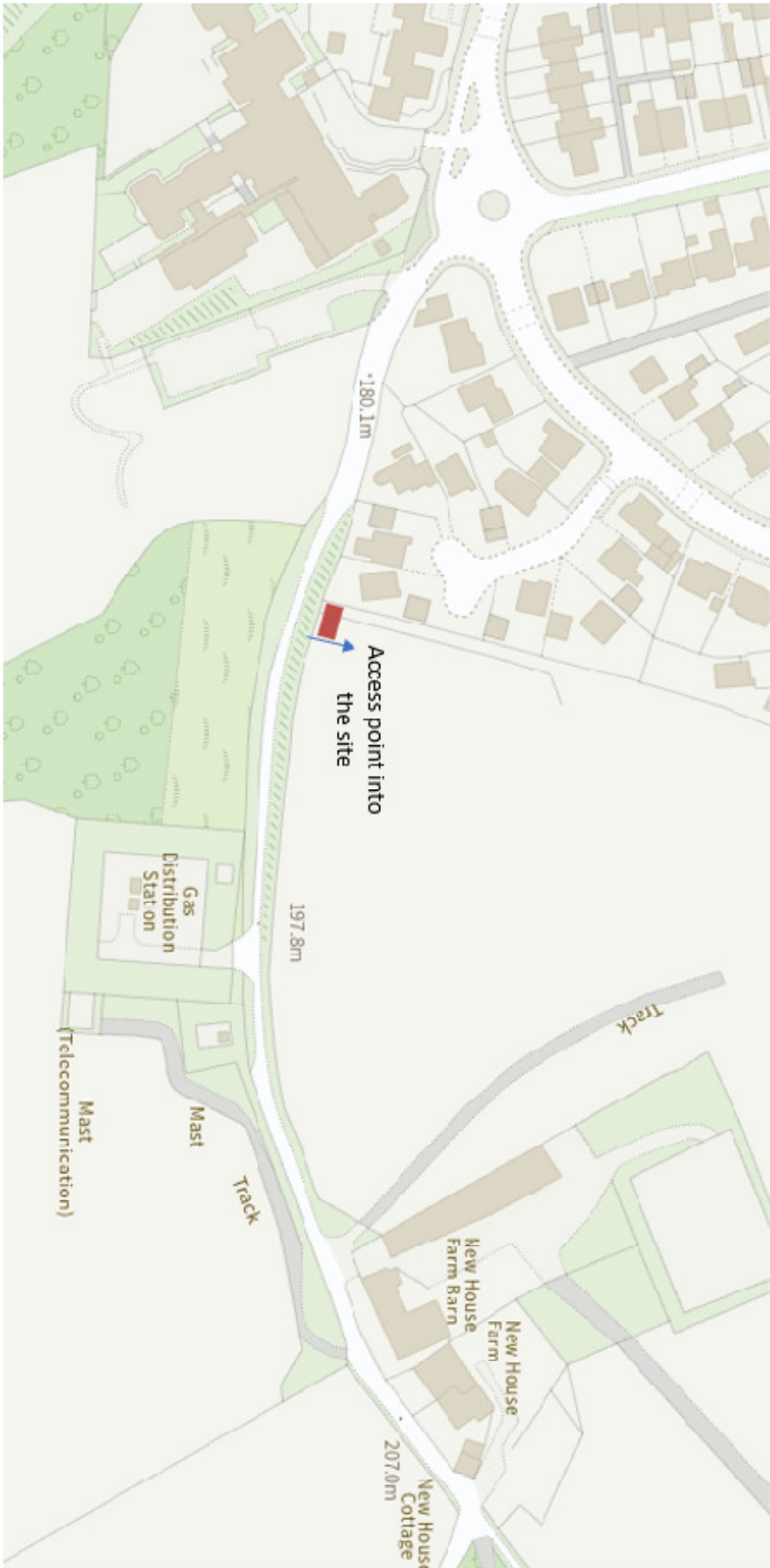
Response

- 1.20. Our client has submitted previously that their land can allow for a larger site allocation at the location of H7. Should Huncoat Garden Village be delayed, or not deliver housing at the proposed rate, the National Planning Policy Framework has contingencies within it to address issues with local housing delivery, with paragraph 11 requiring sustainable development to be approved when a plan becomes out date. If there is an overreliance on the delivery timeline for the Huncoat allocation, then due to its size it may lead to the plan becoming out date. Allocating additional land at existing allocation could provide contingency within the Local Plan to help avoid this situation.

Appendix A – Indicative Access Plan



Appendix B - Maps Showing Position of Access into the site from Sandy Lane







JWPC Ltd

1B Waterview, White Cross
Lancaster, Lancashire, LA1 4XS

Tel: 01524 599980

enquiries@jwpc.co.uk www.jwpc.co.uk

