

This matter is being dealt with by
Dan Mitchell

Cubo Leeds, 6 Wellington Place

Leeds LS1 4AP

Tony Blackburn on behalf of Helen Hockenhill

Hyndburn Borough Council
Scaitcliffe House
Ormerod Street
Accrington

BB5 0PF

tony.blackburn@hyndburnbc.gov.uk

29th August 2025

Dear Helen Hockenhill (BA (Hons) B.PI MRTPI),

Examination of the Hyndburn 2040: Local Plan (Strategic Policies and Site Allocations)

Hearing Statements - Prepared by Caddick Land

Matter 3: Hearing statement

Introduction

Marrons is instructed by Caddick Land (“Caddick”) to prepare evidence in respect of Land South of Altham Business Park. Caddick controls part of the proposed allocation, including all the land west of Altham Lane. We respond to relevant questions below.

Matter 3

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

Question 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?

Document HBC8.004 is the Council’s background paper considering exceptional circumstances. The paper cross references the Council’s need and supply assessments for both housing and employment land as set out in documents HBC8.001, HBC8.002 and HBC8.003.

Paragraph 3.1 of HBC8.004 states that whilst the east Lancashire Green Belt was established in 1979, and the detailed boundaries were incorporated in the 1996 Hyndburn Local Plan but have never been comprehensively assessed since inception. The background paper further notes that the Green Belt around Hyndburn is tightly drawn, providing very limited opportunity for growth.

Tables 1 and 2 of HBC8.004 refer to the relatively small overall size of Hyndburn borough, but which has a comparatively high percentage of land falling within the Green Belt, at 54.8%. The map at Table 2 depicts this, with very few areas of land that could be developed as falling outside of the Green Belt.

Paragraph 3.9 states that Hyndburn has witnessed the continued development for housing and employment land within the urban area, but as a consequence, there are very few good quality housing sites remaining to be developed within the existing urban boundary and ***little to no remaining employment land.***

The evidence presented by the Council for both housing and employment needs clearly recognises that the release of Green Belt land is both justified and essential for any growth in Hyndburn. Without Green Belt releases, it is clear that the borough would struggle to deliver any meaningful growth that appropriately meets the needs of a modern economy, such is the tightly defined Green Belt boundary.

In the case of employment land, the Council also recognises in the background paper that the M65 corridor is now a main factor in economic growth (HBC8.004 para's 4.44 - 4.46 and 6.10 - 6.13). This also has implications for the spatial approach for economic development and Green Belt release, including locational preferences.

Question 2: Has the Council examined fully all reasonable options for meeting its identified needs in line with paragraph 141 of the Framework?

The Council has undertaken a robust and practical assessment of all options in meeting its needs. In reality, the lack of any comprehensive assessment of Green Belt boundaries over a period of circa 30 years means that there are no practical options other than a Green Belt review. This is clearly set out in the Council's Background Paper at paragraph 6.14, which states that without Green Belt release, the Council would be forced to consider unsustainable development patterns and the use of natural assets, resulting in a detrimental impact on green infrastructure, heritage assets and open spaces. The Council concludes that this would be more harmful than Green Belt releases.

Question 3: How do the proposed Green Belt revisions align with the spatial strategy for the Borough? How will they promote sustainable patterns of development?

As noted above, HBC8.004 sets out the significant challenges the Council faces in relation to accommodating much-needed growth. The Council has undertaken a robust assessment considering all relevant spatial options.

In respect of economic growth, the spatial strategy seeks both promote town centre regeneration for the retail and service sector and provide land for large scale employers who cannot reasonably accommodate within the town centre.

It is also an established strategy of the Lancashire Strategic Economic Plan and the Pennine Lancashire Growth and Prosperity Plan to prioritise economic growth in the M65 corridor (HBC8.004 paragraph 6.17 and 6.18). Those economic growth plans recognise that Hyndburn has the potential to accommodate growth of indigenous businesses and to attract inward investment.

Our client therefore supports the Council's conclusion at 6.18 which states that inevitably, the only way to address these recommendations and national policy requirements is to identify new employment allocations on Green Belt as the only suitable locations are within existing Green Belt.

Having regard to the established settlement pattern and a sustainable strategy from growth, the Council has rightly identified land south of the existing Altham Business Park for strategic employment growth. Green Belt release in this location is the most effective and sustainable solution compared with any other and entirely 'new' employment locations. By co-locating employment growth, this maximises the potential for economic growth and utilises existing infrastructure.

Question 4: Is the Green Belt Assessment 2019 (HBC2.001) based on a robust assessment methodology? Does it adequately consider the fundamental aim and purposes of Green Belts?

No comment.

Question 5: Are the revised boundaries capable of enduring in the long term, beyond the plan period?

No comment.

Question 6: The Local Plan proposes the addition of three new areas of Green Belt totalling 10.5 hectares. Paragraph 139 of the Framework sets out that proposals for new Green Belt should only be established in exceptional circumstances and outlines that they should be set out in strategic policies which should demonstrate five criteria are met. Where in the evidence base is an assessment of the sites against these criteria? Have exceptional circumstances been demonstrated for the establishment of these three new Green Belt sites?

No comment.

Question 7: Policy SP1 6e) refers to Green Belt boundary changes to address minor discrepancies. Where are these set out? What are the exceptional circumstances to justify these amendments?

No comment.

Question 8: What is the justification for safeguarding land for residential development and a rail freight terminal at Huncoat for their development beyond the plan period?

No comment.

Question 9: What ways does the plan set out how the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in line with paragraph 142 of the Framework?

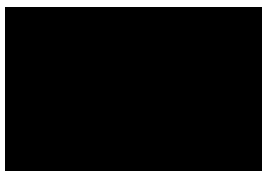
NPPF (2024) paragraph 156 requires plans to give consideration to the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The Council is proposing a range of measures to offset the loss of Green Belt land, including the provision of new Green Belt land elsewhere, as well as policies and mechanisms to improve environmental and accessibility.

In the case of the strategic employment allocation at Altham, Policy EP1 requires high quality planting and landscape buffering, SuDs and wetland provision, improved pedestrian and cycle connectivity to both existing settlements and the Leeds Liverpool Canal corridor.

These are measures supported by Caddick Land and we refer to the appendices to our client's Regulation 19 submission. A full assessment of landscape matters has been completed by Caddick (LDA and Tyler Grange reports), and a landscape strategy plan is included, illustrating the opportunity to provide wildlife improvements, enhancements to the canal towpath and a new woodland walk which opens up the site for the first time and improves connectivity.

Yours sincerely,



Dan Mitchell
Partner

Marrons



T 07484 901 340

