

This matter is being dealt with by
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19th March 2026

Dear Sir / Madam,

HYNDBURN LOCAL PLAN TO 2040 EXAMINATION – HYNDBURN BOROUGH COUNCIL
Regulation 24 Submission Version with Proposed Main Modifications
Representation on behalf of Caddick Developments

We write further to our participation in the Hyndburn Local Plan Examination on behalf of our client, Caddick Developments.

We set out below our client's response to the proposed Main Modifications, where relevant. For clarity, our client's submissions are set out in the table below, corresponding to the applicable modification number.

Ref.	Response by Caddick Developments	Suggested changes
MM06	<p>Our client notes the Inspectors concerns around the funding of road infrastructure to support the delivery of Huncoat Garden Village (HGV) as set out in paragraph 6 of INSP007.</p> <p>The Council refers to the potential of introducing a bespoke delivery mechanism specifically to support HGV.</p> <p>This modification is supported.</p>	N/A
MM12	<p>Paragraph 8e relates to Policy SP2 which entirely relates to HGV.</p> <p>Criterion 8 of SP2) refers to the provision of blue, grey and green infrastructure <i>at HGV</i>, to be underpinned by the principles of sustainable development. This is a specific to HGV and not for other allocations.</p>	<p>Amend Criterion 8e to read:</p> <p>To ensure the infrastructure needed is put in place, development proposals must should:</p> <p>8 e) Consider the opportunity for pedestrian and cycle</p>

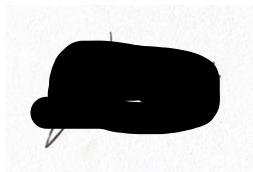
	<p>Criterion 8e references the securing a pedestrian / cycleway bridge across the railway line at Altham Lane. The Council will seek to secure this through the development of Altham Business Park and by working with other private and public sector organisations and infrastructure providers.</p> <p>We object to MM12 and the wording at SP2 8e.</p> <p>Firstly, there is no functional link between South Altham allocation or HGV in policy. Since inception, the structure of the Local Plan policies for HGV and South Altham have not been related or interdependent in any way. During the Examination, there was no discussion or evidence presented that HGV and South Altham are reliant upon each other in terms of connectivity.</p> <p>Secondly, the South Altham allocation benefits from existing public transport, and wider pedestrian and cycle connectivity. This is existing and serves the current business park. Therefore, the allocation is not dependent upon a new pedestrian / cycle bridge over the railway and there is no evidence to suggest that this is required solely due to the expansion of the business park. We will be demonstrating the suitable sustainability of the South Altham site at the time of a formal planning application in line with local and national policy.</p> <p>On the contrary, the existing railway bridge at Altham Lane is within the HGV masterplan area. While we understand that improved cycle and pedestrian linkages are a desirable ‘opportunity’ under the HGV masterplan, this is not a matter that is related to the allocation at South Altham. If a new bridge is required, this is something that entirely relates to HGV.</p> <p>Furthermore, we understand that the Council has not secured any funding or has undertaken any technical evidence to prove the delivery of a new bridge, and there is no disclosure whether discussions with network rail have been conclusive.</p> <p>Criterion 8e is therefore highly unusual and not deliverable in its current format. It risks stalling both HGV and South Altham.</p> <p>We object on this basis and suggest alternate working accordingly.</p>	<p>improvements along Altham Lane to improve connectively of Huncoat Garden Village with the Leeds Liverpool Canal and existing employment area at Altham Business Park by working with other private and public sector organisations and infrastructure providers.</p> <p>A pedestrian / cycleway bridge will be developed across the Railway at Altham Lane to improve accessibility to provide access to the Leeds and Liverpool Canal and Altham Business Park. The Council will seek to secure the delivery of this through the development of an extension to Altham Business Park and by working with other private and public sector organisations and infrastructure providers.</p>
MM21	MM21 makes a slight change to the policy which adds greater flexibility. In the continued absence of any masterplan, this change is supported .	N/A

MM22	MM22 introduces word 'approximately' for greater flexibility. This change is supported .	N/A
MM23	MM23 align with our submissions around the monitoring of jobs from the allocation being unrealistic. As such, we support this modification.	N/A
MM25	MM25 now includes a Net Development Area for the of 36.8Ha. We have checked the area and support the change.	N/A
MM81	We support the proposed modification to have regard to any adopted masterplan.	N/A
MM82	We support the reference to including an Archaeological Desk Based Assessment and results of a field evaluation at the application stage, in response to HER report.	N/A
MM83	<p>We object to MM83 as drafted.</p> <p>This modification seeks to impose the implementation of recommendations of the Heritage Impact Assessment (HBC6.005) into the application process, even though these were only prepared in support of the Local Plan strategy.</p> <p>The HIA finds that there are no heritage impacts to either the canal bridge or Shuttleworth Hall that would prevent the Site from allocation. In preparing a planning application, the design team will fully consider the impact on all heritage assets. As such, this policy wording is not needed as it predetermines the outcome of that process.</p>	<p>Amend EMP3 (part iii) to read:</p> <p>Design Considerations: iii. Preserving the character and setting of the Grade II listed Canal Bridge (Altham Bridge). Consider the impact of any development on the setting of Grade II Listed Shuttleworth Hall and Grade II Listed Canal Bridge.</p>
MM85	<p>We object to the wording at MM85.</p> <p>The word 'reduced' (and even 'restricted' as per the original wording) implies there is an established benchmark measure of acceptability of building height.</p> <p>While we recognise the Council's desire to achieve an acceptable development, the Council has repeatedly stated that it will use the master planning process to inform the scale and massing of the development, having regard to all constraints.</p> <p>This includes any analysis of building heights and until this work is completed, the Council should not be seeking to impose arbitrary measures on building heights.</p>	<p>Amend wording to part viii) as follows:</p> <p>viii. The impact of the height of all proposed buildings should be considered and the height of buildings should be restricted in the upper parts of the developable area to prevent new structures rising above the skyline and blocking views northwards.</p> <p>viii) Any design should consider the height of proposed buildings, having regard to site contours, landscape evidence and any Council masterplan.</p>
MM86	MM86 introduces new criteria for roofing colours on site. This is supported .	N/A

MM87	MM87 introduces archaeological evaluation on eastern parcel and retention of the pond. This is supported .	N/A
MM88	MM88 introduces cross reference to Policy DM17. This is <u>unnecessary</u> as DM17 would apply regardless of the cross reference.	N/A
MM89	MM89 introduces a new criterion for a buffer to the ancient woodland. This is supported , noting that the PPG sets out similar requirements.	N/A
MM90	MM90 introduces new criterion for a Transport Assessment to be submitted with applications. This criterion is <u>unnecessary</u> given that a TIA is required for any application regardless.	N/A
MM91	MM91 removes reference to cost effective transport mitigations for significant impacts. This change is supported .	N/A

We trust that the above considerations will be taken into account in the modifications to the Hyndburn Local Plan.

Yours faithfully,



an Mitchell
Partner

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