B. ACCRINGTON AREA ACTION PLAN

1. LEGAL & PROCEDURAL MATTERS

Key issues:

1.1 Has the Accrington AAP been prepared in accordance with the current Local Development Scheme (LDS), including its timetable, content and timescale, and in compliance with the adopted Statement of Community Involvement (SCI)?

Yes the Accrington AAP has been prepared in accordance with the current Local Development Scheme. The current LDS (April 2011) states a date for Submission as April / May 2011; the actual submission date was 19th May 2011.

The preparation of the Accrington AAP has followed the timetable set out at para 4.1 of the LDS. Its content and timescale are also well aligned with the LDS.

Following the abolition of the Government Office North West, the current LDS was referred to the Local Planning Branch at Department for Communities and Local Government. A response was received from them on the 14th April 2011 confirming that they had no comments to make and would not be issuing any direction.

1.2 Has the Accrington AAP been subject to Sustainability Appraisal, including a final report on the published plan; and is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures? Has Appropriate Assessment under the Habitats Directive been carried out to the satisfaction of Natural England?

Yes, the Accrington AAP has been subject to Sustainability Appraisal throughout its preparation. SA reports have been prepared and consulted on at all stages. The final report is included with the submission documents (see AAAP_Sub1.3 and Appendices in AAAP_Sub1.3a - g).

The formal SA processes and reporting requirements have been carried out by an external independent consultant. And this SA work has been advised by workshop discussions with a Sustainability Appraisal Panel including representation from various disciplines within HBC together with statutory agencies, voluntary and community representatives.

Commentary on how the SA influenced the development of the AAP is included in the SA report (AAAP_Sub1.3), in addition:

\[ Most \ of \ these \ issues \ should \ be \ covered \ in \ the \ Council's \ Legal \ Compliance \ Self-Assessment [AAAP_Sub1.5] \]
o Section 2.2, Table 2.1, page 8 - summarises the stages in development of the Accrington AAP and the SA processes

o Section 6 page 26 (together with Appendix D), covers the SA of four alternative options for the AAP, concluding that none of the alternative options in isolation would provide for sustainable development within the town centre. It was therefore considered that a hybrid approach would be required to ensure a balance between economic growth and social and environmental regeneration. This is the approach that was taken forward through the further development of the AAP.

Recommendations and Mitigation measures are documented throughout the SA report. These will also be considered during the preparation of more detailed development briefs.

Yes, Appropriate Assessment has been carried out to the satisfaction of Natural England. A Screening Report was prepared for the Accrington AAP in conjunction with the Core Strategy.

The Appropriate Assessment Screening Report concluded that "the Accrington Area Action Plan (and the Core Strategy) would not have any significant effects, either alone or in combination, on the function or viability of any Natura 2000 sites or prevent any of the Natura 2000 sites from maintaining their species or habitats in favourable condition."

At Publication stage Natural England commented, saying "Natural England commented upon the draft appropriate Assessment Screening Report in our letter of 22 January 2010. Our advice appears to be reflected in the revised document, and we have no additional comments to make at this time."

1.3 Does the Accrington AAP have regard to national planning policy, and is there sufficient local justification for any policies that add nothing to, or are not consistent with, national planning policy?

Yes the Accrington AAP has had regard to national planning policy. It has also had regard to new and updated national planning policy that has emerged during the preparatory stages of this Strategy. The Self Assessment of Soundness (Post_2.9), page 12-13 and sections 2.3-2.6 of the AAP itself confirm this position.

1.4 Does the Accrington AAP conform generally to the Regional Spatial Strategy, is it consistent with the Hyndburn Core Strategy, and does it reflect the various Pennine Lancashire MAA/strategies and other relevant programmes, strategies and initiatives?

Yes, the Accrington AAP is considered to be in general conformity with the approved North-West Regional Spatial Strategy. Following the abolition of
4NW (the Regional Planning Body), no response was received in relation to Publication consultation stage.

The Accrington AAP is wholly consistent with the Core Strategy and builds upon the overarching policies which are set out in the latter by providing a more detailed framework for the spatial development of the town centre. Section 2 of the document sets out the policy influences and amongst these are those plans and strategies at the Pennine Lancashire level. Section 2.22-2.27 shows how the AAP is a key tool in delivering the objectives of the Pennine Lancashire MAA (CS_Supp2.1).

1.5 Does the Accrington AAP have regard to the Hyndburn Sustainable Community Strategy?

The Accrington AAP has strong links with the Sustainable Community Strategy (SCS) and the relationship is set out at page 19 and figure 3 of the submitted document. The over-riding principles and outcomes of the SCS are reflected in the structure of the AAP. The relevant objectives of the SCS are also set out in the policy context table of chapters 5-10 of the submitted document.

2. **VISION AND OBJECTIVES**

Key issues:

2.1 Does the Vision:

a. clearly set out the vision for the future strategy and spatial pattern of development in Accrington over the plan period?

The Vision

Yes, Part A of the AAP provides an introduction and background (A1), the strategic and local policy context (A2), the characteristics and key issues (A3) and in section A4 the vision, objectives and proposals are established.

The vision for Accrington is that it "will become a vibrant floral market town with an excellent quality of place at the heart of Pennine Lancashire."

A series of aims and objectives are then presented, each of which would contribute towards achieving the vision:

- strengthening the retail provision in the town centre
  - To provide additional comparison retail in the town centre in larger units
  - To provide additional convenience retail in the town centre
  - To enhance the retail quality of the current offer
  - To support the improvement and refurbishment of the Market Hall and Pavillions
  - To support existing and future independent retailers
To create clearer pedestrian retail circuits

**becoming a visitor destination**
- To provide better connections to other Borough attractions such as Oswaldtwistle Mills and Haworth Art Gallery
- To create more diverse uses in the town centre
- To make better use of the Town Hall as a visitor destination
- To promote the heritage interest and value of the town

**enhancing the quality of the environment**
- To restore interesting and characterful buildings for active uses and enhance their settings
- To link the town centre to its surrounding parks and green spaces
- To enhance and create a network of civic and green spaces within the town centre linking quarters to the high street
- To introduce landscape buffering to sites and properties that create visual blight
- To maximise the contribution that habitats and greenspace can make to the control of run off and flood alleviation

**improving access, movement and transport**
- To restore the role of Blackburn Road as the town’s High Street
- To create a route and parking strategy based on strengthening the high street
- To identify a new site for a bus station that supports the wider regeneration of the town
- To rationalise surface car parking to free up strategic sites and improve the quality of the environment
- To create quality gateways at key arrival points to the town centre and provide clear direction

**promoting investment and business development**
- To create new modern office workspace and assemble high quality employment sites
- To consolidate existing industrial uses through relocation and release sites for new modern employment and housing development
- To develop local enterprise, start up businesses and skills
- To encourage new residential living in the town centre
- To promote areas of the town for new mixed use development

**improving education and training opportunities**
- To provide A Level provision in the Borough offering children the opportunity for further education without leaving the Borough
- To improve vocational training and qualifications through the further investment and development of Accrington and Rossendale College.
To enhance educational facilities in the Borough through the Building Schools for the Future Programme.

To improve access to jobs for local people

The policies presented within the AAP set out in more detail how the aims and objectives will be implemented through the planning process.

Spatial Pattern of Development

When considering the spatial pattern of development in Accrington town centre it is important to recognise that the process does not start with a blank canvas. The existing context of the town centre is presented in the AAP and there are many plans and diagrams that help develop an understanding of how the existing town centre functions with a view to identifying the measures needed to improve it. Directing development towards particular sites or locations is only part of the AAP, much of which is also concerned with improving the environment of the town centre and making it more attractive for businesses and visitors through a variety of regeneration initiatives.

The aims and objectives (set out above), complemented by the plans and policies within the document, clearly set out the proposed spatial pattern of development. These, combined with some of the softer regeneration measures proposed (such as signage, pedestrian routing, environmental improvements etc), should help ensure that the vision for Accrington town centre is realised.

b. contain sufficient local and spatial distinctiveness, reflecting key elements and local issues relevant to Accrington, including the vision, priorities and policies of the Core Strategy?

The Accrington Area Action Plan is about Accrington and this is evident throughout the document. It includes sufficient local distinctiveness as evidenced by the large number of accompanying maps, diagrams and photographs throughout the text that are all concerned with aspects of Accrington. From the outset, the masterplan was a document for the town and this has been followed through into the Area Action Plan.

Part A2 of the Area Action Plan sets the Strategic and Local Policy context and within that section there is reference to the Core Strategy. The AAP and Core Strategy have been prepared concurrently and the AAP is consistent with the vision, aims and objectives of the Core Strategy.

2.2 Objectives:

a. Does the Accrington AAP contain clear, specific and locally distinctive objectives, which reflect the full range of key issues and objectives relevant to the implementation of the plan?
Yes, the objectives are clearly set out within AAP and these are specific and locally distinctive. The objectives were arrived at through extensive consultation with the local community and stakeholders with an interest in the town centre. Importantly, they also reflect the objectives that underpin the Sustainable Community Strategy for Hyndburn.

b. Should the plan give more emphasis to promoting sustainable forms of transport, including stronger pedestrian routes and cycling?

No, one of the aims of the AAP is to “Improve Access, Movement and Transport” in the town centre and it includes a number of objectives that could help achieve this. Chapter 8 of the AAP concerns Transport and Access and this establishes how improvements in access, movement and transport will be achieved.

One of the specific objectives of the AAP (listed above) includes the creation of a route and parking strategy based on strengthening the high street. The supporting text (para 4.45) stresses that this concerns all modes of transport including cycling and walking. In addition, there is a section on pedestrian circuits (para 5.19 to 5.26) and a plan (Figure 30) that illustrates proposed town centre retail circuits. This is further mentioned at para 6.10 within the section on the town centre streets network and in para 6.39 which concerns ease of movement within the town centre. The need to develop high quality pedestrian and cycle links is also emphasized by para 8.8 which concludes the section on transport.

Policy ATC10 makes specific reference for the need to improve opportunities for walking and cycling between the town centre, bus station and railway station, residential areas and workplaces and green spaces and corridors.

Chapter 8 is on Transport and Access and Policy ATC 15 recognises that greater priority should be given to pedestrians, cyclists, public transport users and people with disabilities when opportunities arise and also stresses the need for a well-connected, pedestrian friendly environment in which vehicle and cyclist access is balanced and to implement pedestrian and cycle priority schemes to improve the environmental quality of the streets. The policy also indicates that the Council will work in partnership with other organisations including Lancashire County Council (the Highway Authority).

The Council has already worked with Lancashire County Council and Tesco on the funding and development of a new “eco-station” (Accrington Railway Station) which has been designed to a high standard and planning permission has also been granted for a new bus station on the Crawshaw Street site. Policy ATC 17, Public Transport, supports the development of a new bus station on this site and also encourages the development of links with the
recently completed railway station. This is explained in the supporting text (para 8.18 – 8.40) which also includes an illustration of the railway station.

Policy ATC 18 is specifically concerned with the Pedestrian Environment and outlines ways in which the walking environment will be improved. This is explained in the supporting text (para 8.41 to 8.48).

The Council believe that the AAP sufficiently promotes the need for sustainable forms of transport, including walking and cycling.

3. POLICIES

Key issues:

3.1 Policy ATC1 - Is the range of uses within the town centre appropriate, soundly based, justified with evidence, and consistent with the Core Strategy and national policy guidance (including PPS4)?

Policy ATC1 seeks to strengthen and enhance the retail offer within the town centre. It seeks specifically to provide for additional comparison goods retailing within the Primary Shopping Area and the provision of additional convenience retailing within the wider town centre. This is achieved through the identification of additional development sites (specific policies for these sites appear in part C of the submitted document). Other aspects of the policy relate to other measures to support and enhance the retail offer.

The evidence from the Retail Study (CS_Supp3.11) and the baseline report AAAP_Supp1.6) and as summarised in 5.2-5.7 of the submitted AAP show that the retail position of the town centre is weak; there was considerable leakage of expenditure to neighbouring centres; that there was capacity for additional convenience and comparison goods retailing and that there was a convenience retailing was under-represented; and there was a lack of suitable premises to meet retailer requirements.

The submitted Core Strategy, based on evidence, identifies Accrington as the Principal town centre in the Borough which will provide for the Borough’s key services and comparison and food retailing needs (policy A2 of CS_Sub1.1). The Council consider that policy ATC1 is entirely consistent with the Core Strategy.

The Council consider that policy ATC1 is entirely consistent with part EC4.1b of PPS4.

Policy ATC1 relates to enhanced shopping facilities. It does not preclude other uses in the town centre. The Council recognise that a range of uses contributes to vital and viable town centres. Other uses are covered by subsequent policies (office/employment uses at ATC4, public administration/courts at ATC5, arts, leisure and culture at ATC6 and housing
at ATC7) including the policies for the spatial quarters in part C of the AAAP which identify sites for a range of uses including: retail (convenience and comparison); offices; cafes, restaurants, new bus station; leisure uses etc. These policies and uses are all entirely consistent with guidance in PPS 4. Whilst PPS4 does not offer guidance in relation to housing (see point 5 of the introduction), it does state that residential development can be encouraged above ground floor retail, leisure or other facilities within centres (PPS4 para. EC3.1f).

PPS3 also states that options for accommodating housing growth may include providing housing as part of mixed use town centre development (para 38). The Council consider that the development of some housing in the town centre will add to town centre vitality and viability; it will assist in the regeneration of the town centre; and will contribute to the restructuring of the housing market (see policy ATC7 of the submitted AAAP). Sites within the town centre where residential uses are permitted are located outside the Primary retail area e.g. site 16 (Victorian Arcade) where restoration should involve residential uses at upper floors and site 7 (former Baptist Church on Cannon Street and site 8 (La De Das) which are suitable for conversion to residential use (note that the conversion of La De Das to residential use is completed). Site 2a has already been developed as apartments. Further sites for residential use lie within the Grange Quarter and the Eastgate Quarter. These are within the Action Area Plan boundary but outside the town centre boundary.

3.2 Policy ATC2 - Is the policy to limit non-retail uses within the Primary frontages and restriction of Class A5 uses appropriate, soundly based, justified with evidence and consistent with the Core Strategy and national policy in PPS4?

The Council consider that Policy ATC2 which seeks to control the amount of non retail uses to varying degrees in different types of frontages is appropriate. It is a tool in support of one of the key objectives of the AAP, “Strengthening the retail provision in the town centre” (sections 4.10 to 4.28 of the submitted AAP). This is based on evidence from the Hyndburn retail study and the baseline report which shoed the need to strengthen retail provision in the town centre.

The submitted AAP identifies primary and secondary retail areas on the submitted proposals map. Appendix 2 adds further detail to policy ATC2 by identifying primary and secondary frontages to which the policy refers. The identification of these areas is in compliance with part EC3.1c of PPS4. The Primary Retail Area comprises the area around the Arndale Centre, Broadway and Union Street and is the area where retail uses are most concentrated, in line with the definition of Primary Shopping Areas in Annex B of PPS4. The primary retail frontages are located in this area. The Secondary
The retail area is also shown on the Proposals Map and contains the identified secondary frontages. The town centre land use plan at Figure 8 on page 30 of the submitted AAP shows that the Primary retail area is indeed the area where retail development is concentrated. It also shows that the secondary frontages have lower concentrations of retail uses. This is consistent with the definition of the types of frontages in Annex B of PPS4.

The requirement that non A1 uses should not exceed 20% of the length of the primary frontage within any one of the defined sections in the policy for primary retail frontages is both a reflection of the situation in some current frontages and aspirational in respect of others. For example the primary frontage along the north side of Broadway has A1 uses for more than 80% of its length, whilst along Union Street, none A1 uses are in the region of 40% of the length. The policy therefore seeks to both strengthen and protect A1 uses in the primary retail area. This approach is considered appropriate in terms of strengthening the retail offer in the town centre.

In terms of hot food take-aways, the previous policies of the Hyndburn Local Plan permitted in principle such uses in the primary shopping zone and the town centre shopping areas under policies R1 and R2. Specific criteria for hot food takeaways were set out in policy R6. As a result the town centre has witnessed an increase in the number hot food takeaways particularly in the Church Street and Blackburn Road areas. Due to the number, nature and time of operation these can adversely impact upon the vitality and viability of the town centre in terms of opening hours, “dead frontage” during daytime and associated signage issues. The Council therefore wished to strengthen its approach through the policies of the AAP.

Nonetheless the Council consider upon reflection that the policy as drafted does not provide the level of clarity that it should in relation to which non A1 uses are and are not permissible in the secondary frontages and will endeavour to provide clarification.

3.3 Should Policy ATC2 confirm that new comparison and convenience retailing will be focused in the Primary Retail Area of the town centre?

Policy ATC2 seeks to guide development in the primary, secondary and other retail frontages. Policy ATC1 guides additional comparison retail floorspace to sites in the Primary Retail Area (sites 4, 23, 30 and 33 although it should be noted that site 30 is within the secondary retail area). Additional convenience retail development is directed to three sites in the town centre. Site 1a is within the town centre but outside the primary and secondary retail areas but in any event is now developed as a TESCO store. Site 4 is the Arndale within the Primary retail area which is also identified for additional
comparison retail floorspace. Site 30 is on Whalley Road which is in the secondary retail area and is also identified for comparison goods retailing. Hence this approach identifies that there is scope for additional new comparison and convenience retailing in both the primary and secondary retail areas of the town centre rather than focussing solely on the Primary retail area.

The Council would not wish to see the secondary retail area developed at the expense of the Primary retail area. To this end the last paragraph of policy ATC1 effectively provides a sequential test in relation to the considering proposals for retail and other uses outside the Primary Retail Area.

3.4 **Is the strategy for the redevelopment and growth of the Arndale Centre soundly based, and should the Primary Retail Area be extended around the Arndale Shopping Centre (Whalley Road/Eastgate) to enable this strategy to be implemented?**

The Council believe that the approach taken with respect to the Arndale is soundly based but do not believe that the primary retail area should be extended to Eastgate at present.

The importance of the Arndale centre is recognised by the AAP and representatives of the owners of the Arndale (Protego Real Estate Investors) were involved throughout the preparation of the masterplan and AAP.

Although the Arndale was only developed in the 1980's, a concern has existed for many years that the format of many of the units within the Arndale was not the size sought by many high street retailers. Although there are opportunities to partially remedy this by extending into the western service area, something that is recognised by the AAP, the proposals have never crystallised into a planning application. Policy AQ2 of the AAP would support proposals of this type.

More recently the owners of the Arndale have discussed development proposals with the Council that have involved the development of major new supermarkets on the site as well as the development of several medium sized units on land in and around the service area and up to Eastgate and Broadway. Although these proposals have not developed into a planning application Policy AQ2 of the AAP would provide some support for a development of this type.

The extent of the primary retail area as drawn in the Local Plan and Accrington AAP is a reflection of what is on the ground at the moment. The Arndale forms a key part of the primary retail area and town centre policy should not be so restrictive to prevent an appropriately sized extension to the Arndale. The centre is in a sequentially preferable and accessible location
where retail development (of an appropriate scale) would normally be supported.

Extending the extent of the primary retail area to include Eastgate in advance of any development proposals being submitted or agreed may have an adverse impact on existing commercial uses along Eastgate, the policy framework for the primary retail area being more restrictive than that for the secondary retail area. Should planning permission be granted for an extension and for this to be developed, there would be merit in extending the boundary of the primary retail area to include the area covered by the extension. A planning application would need to be accompanied by the information required by PPS 4.

The Council understand that the Arndale is currently for sale.

3.5 **Should Policy ATC7 indicate the scale of housing development proposed in Accrington town centre, including affordable housing?**

The Council do not consider that ATC7 should indicate the scale of housing development in the town centre, including affordable housing. The Core Strategy sets out the overarching framework for spatial development in the borough and at policies A1, GH1, and R1 seeks to apportion the overall housing provision to the spatial components of the Borough. New residential development in the town centre would make a contribution to the overall provision for the Accrington apportionment of 75% of the overall housing figure (as set out at policy A1). It would not be appropriate at this stage to disaggregate the housing figures to lower level spatial areas.

Several development sites in the town centre are considered suitable for housing development, particularly in the Grange quarter and at Eastgate and Water St where sites would be suitable for a mix of range of housing which would contribute to the restructuring of the housing market. While in principle these sites are suitable for a mix of housing, development briefs need to be prepared (as set out at 11.96ff of the AAP) to set out a greater level of detail, including guidelines about the number and types of dwellings, taking into account constraints such as flood risk where appropriate and the need for high quality design on certain sites (e.g. site 19). In the town centre there is scope for higher density developments. While it is possible to gain an estimate of the yield of sites in the town centre, the sites have a significant role to play in the regeneration of the town centre and the identification of the scale of housing at this stage in advance of detailed briefs may prove unduly prescriptive. Annual monitoring of overall housing delivery against Core Strategy requirements is the appropriate mechanism and scale will assess how much new housing is delivered.
In relation to affordable housing this will be guided by the overarching policies in the Core Strategy. There is no evidence to suggest the affordable housing requirements should be different in relation to the AAP area.

3.6 **Policies ATC19-ATC20: Has the Accrington AAP assessed the impact of development proposals on cycle and car parking in and around the town centre?**

Yes, Policies ATC 19 and ATC 20 are concerned with cycling/cycle parking and town centre parking respectively. The aim of these policies is to ensure that opportunities for cycling and cycle parking are maximised and that car parking capacity is made better use of. A key element of the car parking policy is to develop a route and parking strategy.

The accompanying text and following pages explain how these policies will work and there is also text at page 123 of the AAP (see AAAP_Sub3.5) that includes commentary on the cycle and parking provisions.

The Lancashire County Council Highways consultation comment October 2010 indicates the following:-

“Lancashire County Council support the idea and principles behind the Area Action Plan”. (The consultation response sets out further requirements for consultation and agreement in relation to the detailing of all highways matters)

And a more specific comment in relation to car parking:-

“Any new development related car parking to be provided off street, must not undermine the sustainability of the development by overprovision.”

Para 8.58, page 123 of the AAP also includes commentary on proposals for 2 new car parks to replace any loss of parking to development proposals. At the time of writing one of these was described as the ‘Skills Centre area’. This has now been provided through the Tesco development where a large amount of public parking is now available, on a site which was previously limited to private uses. A total of 497 spaces are available for combined trips to the town centre together with the Tesco store, for up to 3 hours.

The policies and proposals of the AAP overall seek to give greater priority to pedestrians and cyclists. For example, in addition to Policy ATC19 on cycling and cycle parking, this is complemented by Policy ATC10 on green infrastructure, also seeking improved opportunities for walking and cycling. The principle of improving crossings and routes is consistent with guidance for enhancing urban cycling, from sources such as Cycling England and Sustrans.
The transport and access policies were assessed through the Sustainability Appraisal processes. Section 7.7.4, page 40 of the SA report (AAP_sub1.3) includes the results of this assessment, concluding that “The policies in this section aim to support all modes of transport, however, the emphasis is very much on improving the quality of the environment and experience for cyclists, pedestrians and those using public transport”. And in relation to car parking, the SA report comments that “Policy ATC20 proposes a rationalisation in car parking spaces, providing some discouragement for travel by car. However, it also seeks to improve access to car parks and associates car parking with the (economic) strength of the town centre.” And included in the mitigation measures:- “It should be ensured that the Council’s policies for car park planning and pricing help to support town centre businesses, as access by car will continue to be important, at least in the short-medium term.

Para 8.61, page 124 of the AAP, recommends the preparation of detailed parking strategy. Discussions between LCC Highways and the Town Centre Management Board are ongoing, seeking to look holistically at the parking requirements for the whole of the town centre, including improvements to the functioning of existing car park provision together with on-street parking and time limits.

Development briefs for the spatial quarters (in particular the Grange Quarter) will consider the implications in detail. Illustrative layouts shown in the AAP document can be further developed to show land use proposals that balance all practical requirements for implementation, including car parking, flood risk, cycling, walking and green space provision. These will be developed in consultation/partnership with the Highway Authority (Lancashire County Council).

3.7 **Is the approach to assessing the transport impact of new developments, including transport assessments and travel plans, appropriate and soundly based, and is there sufficient evidence that adequate transport analysis has been undertaken to assess the traffic/transport impact of proposed developments?**

When considering transportation issues it is important to remember that Government Policy see town centres as locations for business and commerce and as locations that should be at the heart of the regeneration of areas. The very nature of centres, and Accrington is now different in this respect, is that they form a focal point and for this reason benefit from the presence of bus or rail terminals from which people can enter and leave the town centre to and from a variety of locations. The AAP proposes improvements in public transport that should be able to cater for the level of growth proposed and assist in modal shift.
Lancashire County Council were involved throughout the development of the Masterplan and consulted throughout the development of the Accrington Area Action Plan. The Accrington AAP makes provision for the development of new transport infrastructure, mainly associated with the development of a new Railway Station (which has now been completed) and a new bus station (which has been granted planning permission and which forms part of Pennine Reach). The AAP acknowledges that it is outside the scope of the document to undertake a full impact of traffic.

The AAP includes a chapter on Transport and Access (Chapter 8). The AAP has not sought to undertake a detailed assessment of the transport impacts of all the allocations / proposals within the AAP and it is not considered that this is necessary for the following reasons:

- Accrington Town Centre is the commercial and administrative centre of Hyndburn and should be a focus for growth.
- Accrington Town Centre is already densely developed and many of the proposals within the AAP are for re-development or the change of use of existing sites. These sites will benefit from some form of existing use rights that would have generated a particular level of traffic;
- The majority of the proposals within the AAP are modest in scale. The AAP does not propose a level of growth within the town centre that is not consistent with its existing role and function.
- Lancashire County Council has been involved in the preparation of the masterplan and consulted throughout the preparation of the AAP. No concerns have been raised about the capacity of the existing highway network as a consequence of the development proposed in the AAP either individually or cumulatively.
- Although in allocating sites within the AAP would give rise to a presumption in favour of development, that does not mean to say that the transport impacts associated with development proposals will not be assessed in more detail when planning applications are submitted. For the larger schemes, it would of course be necessary for developers to engage with the planning authority and the highway authority at an early stage to resolve highways issues.
- The AAP includes a sufficient and proportionate evidence base on Transport and Access

The approach taken to travel planning at para 8.62 appears to be consistent with national policy.

The Council will work with the Highways Agency in the development of the Site Allocations DPD’s / Neighbourhood Plans.

3.8 How will Policies ATC22/ATC24 ensure that the necessary infrastructure and additional requirements for facilities (eg.
education, community, health care and waste management) is provided to enable the strategy to be delivered?

Work undertaken in relation to the Hyndburn Core Strategy has not identified an infrastructure deficit in relation to community facilities such as education, community, health care or waste management. However, the Accrington AAP recognises that it would be prudent to keep infrastructure capacity under review.

Policy ATC 23 recognises that where new development places a burden on infrastructure, or requires improvements to be made, contributions will be sought from the developers to fund the improvements needed to accommodate the development. This is consistent with national policy.

3.9 Is the approach to flood risk management and drainage soundly based and consistent with national policy guidance (including PPS25), and are there any issues outstanding from the Environment Agency?

The Council has been working with the Environment Agency to address the issues raised by the EA and to ensure that the AAP is consistent with national policy guidance.

The Council believes that it is working towards resolution of this matter, however, this would not have been possible without the help and cooperation of the Environment Agency.

3.10 Does the plan make sufficient reference to coal mining legacy issues, including ground instability?

No, although the Council initially suggested that the AAP should be read in conjunction with the Core Strategy and that there was not a need to duplicate the text of the Core Strategy, on reflection the Council believe that given the extent of coal mining across the Borough the AAP would benefit from incorporating the text suggested by the Coal Authority in relation to the legacy of coal mining in the area (including the town centre). It is suggested that the following text be included after the section on flooding under the heading “Former Mine Workings”:

“The Hyndburn area has previously experienced mining activities which have left an environmental legacy. This legacy has the potential to lead to public safety hazards unless there is awareness and any risks have been fully considered and appropriate treatment/mitigation measures have been incorporated into new developments. The area covered by the Accrington AAP may be affected by former coal mine workings at a shallow depth and there are recorded mine entries close to the plan boundary. New development proposals should take account of any risks associated with
former coal mining activities within the area and, where necessary, incorporate suitable mitigation measures to address them."

In terms of the policy framework needed to address this matter, the Council agree that development proposals should “address and mitigate any ground stability issues, including those arising from mining legacy”, however, the Council do not agree that text should be included that suggests that development may be unacceptable on the grounds that it would sterilise existing mineral resources. The extraction of coal from sites within Accrington Town Centre would not be supported by the AAP.

In policy terms the text proposed by the Coal Authority does not sit particularly well with Policy ATC 11, however, since the majority of the sites likely to be affected by former workings are in the Grange Quarter, it may be appropriate to insert some suitable wording into Policy AQ4. The following additional text is recommended at the end of the existing policy:

“Areas of the Grange Quarter has previously experienced mining activities which have left an environmental legacy. Development proposals within this area should address and mitigate any ground stability issues including those arising from mining legacy.”

4. SPATIAL QUARTERS
Key issues:
4.1 Do the policies and proposals for the Spatial Quarters clearly identify the distribution of land-uses and their inter-relationships, including specific site allocations, and set out the timetable for the implementation of the proposals?

Yes, the proposals for the spatial quarters complement the overall strategy, its aims and objectives. The AAP includes plans that illustrate the distribution of land uses across the town centre and for each quarter. Site allocations are clearly illustrated in the AAP although the Council accept that the plans would benefit from having the boundaries of each site clearly annotated.

The plans illustrating the proposals for each quarter are extracts from the main proposals map. However, these extracts would benefit from having a scale, the sites annotated and road names inserted to help the reader understand what is proposed. Whilst the Council therefore believe that the distribution of land uses and their inter-relationships is illustrated, there is scope for improvements that would help users of the document.

Part D of the AAP is concerned with implementation and at page 177 presents a table titled Phase 1 projects. Since the masterplan and draft AAP were prepared the context for implementation has changed and the Council recognise that there is a need to update this table. The NWDA no longer
exists and although good progress has been achieved on some of the proposals listed, a greater degree of uncertainty exists in relation to others due to cuts in Government funding, for example Pennine Reach which is now being assessed against a pool of other schemes that would be funded through a significantly reduced budget.

On a positive note, the Council is seeking to invest the s.106 funding associated with the Tesco development in line with the recommendations of the AAP and this work is underway. The Council will prepare a revised timetable for the implementation of the proposals and will submit this as a proposed change.

4.2 Is the approach to proposing development in flood zone areas and over culverts appropriate, soundly based, justified with evidence and consistent with national policy in PPS25, and are there any issues outstanding from the Environment Agency?

The Council has been working with the Environment Agency to address the issues raised by the EA and to ensure that the AAP is consistent with national policy guidance and the approach taken by the EA to culverted watercourses.

The Council believes that it is working towards resolution of this matter, however, this would not have been possible without the help and cooperation of the Environment Agency.

4.3 Are the specific proposals deliverable, in view of flood risk, drainage, land contamination, economic and other constraints and issues?

Yes, the majority of the specific proposals are deliverable and no issues have been raised in relation to the presence of contamination or economic constraints that would affect the principle of the proposals. However, as part of the work undertaken in relation to 4.2 above, the Council are reviewing the site allocations in the AAP having regard to the exceptions and sequential test. At the present time, this is raising a question mark about the deliverability of Site 32 (Cross Street). This site (a small site in the Grange Quarter identified as a site for housing development) would be removed from the AAP. The Council do not believe that the removal of this site from the AAP would affect the overall strategy and that this change could be accommodated through relatively minor changes to the text of the document. These would be set out in the proposed changes that are currently being prepared.

5. OTHER MATTERS

5.1 Monitoring and implementation
a. Are the arrangements for monitoring the policies and proposals of the Accrington AAP adequate, effective and soundly based, including the indicators, baseline information and targets/milestones used?

Yes, the Council considers that the arrangements for monitoring implementation of the AAP are adequate, effective and soundly based. However, it is also important to recognise that a number of changes have taken place since the masterplan and draft AAP were prepared that may have an impact on implementation, particularly in respect of public sector funding sources.

Part D of the AAP includes a section on monitoring and a table is presented that represents a “town centre health check”. As part of this work it would be necessary to establish a baseline position and to monitor changes against that position. Some comparison with other similar towns would also be beneficial.

b. Are the delivery mechanisms and timescales for the implementation of the policies clearly identified, including details of who will implement each proposal?

Section 12 of the AAP sets out clearly the mechanisms for implementation to deliver the proposed AAP and its subsequent development briefs. It identifies the key groups which are already involved in delivering the regeneration of the town centre and the need for a new Town Centre Working Group which will have a key role in managing the implementation of the AAP overseeing its delivery. It is worth pointing out that existing groups are already well established and have a track record of delivering projects in the town centre e.g. refurbishment of the Market Hall, working with the public and private sector to deliver new development at Scaitcliffe Lodge and the New Health Centre, the new TESCO store etc.

The 59 projects of the AAP are grouped into 4 headings and the early actions which are associated with individual projects are identified as phase 1 projects on page 177 of the submitted AAP. Whilst some of the projects will be complete in the early phase of the plan, some will require further action and some projects altogether will commence in the later phases of the plan period.

The AAP identifies that the public and private sector have a role to play in delivering the proposals. Potential organisations are identified in term so funding. At this stage it is not possible to identify partners or specific developers for delivery of some of the longer term projects.
c. Does the Accrington AAP provide sufficient flexibility to implement the proposed strategy if the policies are not being successfully implemented?

The AAP sets an ambitious strategy for the regeneration of the town centre. Monitoring is a key tool in assessing whether the AAP is being successfully implemented and the Council's approach is set in section 12 of the submitted AAP. Sections 12.28 identifies that there are significant challenges for future delivery. The table at 12.32 of the submitted document identify potential risks to the plan and measures to mitigate these risks.

The AAP policies set out ranges of uses that would be appropriate in the town centre, not only to reflect the guidance in PPS4 but to ensure a degree of flexibility.

Whilst the AAP sets out an ambitious strategy for change in the town centre, the Council considers that the AAP is sufficiently flexible to deal with possible changes in the plan period.

5.2 Proposals Map
a. Does the Proposals Map accurately illustrate the key proposals of the Accrington AAP?

Yes, the Proposals Map clearly illustrates the key proposals of the Accrington AAP, however, the Council recognise that there would be benefit in clearly annotating the boundary of each site.

b. What is the status of The Masterplan [AAAP_Sub1.2]?

The Masterplan was adopted by the Council by resolution of its Cabinet in July 2008. At the same meeting it was resolved that an AAP should be prepared as a means of giving the policy document “development plan” weight in the decision making process.

The Masterplan was subject to public consultation prior to being adopted by the Council. The Masterplan would therefore be a material consideration in the determination of planning applications.

5.3 Other matters
a. Other matters not yet specified. (None identified to date)