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Hyndburn Borough Council Local Plan

Retail Thresholds Evidence Note

July 2016

(Amended August 2016)

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1. Introduction

1.1. This Retail Thresholds Evidence Note has been prepared to examine the key evidence that is available and of relevance to assessing the health of the town and district centres in Hyndburn. It is intended to support the policy approach being proposed in the emerging Development Management DPD. The context for this piece of work is the consideration of the representations submitted to the Consultation Draft Development Management DPD, and in particular:

A. whether it is appropriate to set local retail thresholds in Hyndburn; and
B. if so, what a proportionate and appropriate threshold should be for each centre

Rationale

1.2. Town centres lie at the heart of our communities and a key element of the National Planning Policy Framework (NPPF) is to ensure the future health and vitality of town centres. In order to promote competitive town centres, NPPF has introduced the sequential test (para. 24) and the impact test (para. 26).

1.3. Paragraph 26 of the NPPF specifically states that:

'*when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500sq.m). This should include assessment of:*

- *The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.'*

1.4. In Hyndburn, the nature of the town and district centres (in terms of their size and health) mean that use of the national threshold of 2,500sq.m is considered to be an unlikely appropriate trigger for assessing potential impacts from future 'edge' or 'out of centre' proposals. The Council has therefore produced this evidence note to provide the justification for implementing local retail impact thresholds in the Borough.

Method

1.5. Where local authorities are considering whether to adopt local retail impact thresholds, the National Planning Practice Guidance (NPPG) [1] states that:

'in setting a locally appropriate threshold it will be important to consider the:

- *scale of proposals relative to town centres;*
- *the existing viability and vitality of town centres;*
- *cumulative effects of recent developments;*
- *whether local town centres are vulnerable;*
- *likely effects of development on any town centre strategy; and*
- *impact on any other planned investment.*

1.6. The Council has therefore used the above considerations to provide a structured approach to this evidence note. However, before we turn to each of the specific considerations set out above (covered in Section 3 of this Note), we summarise the relevant aspects of policy and evidence base in relation to retailing matters in Hyndburn.

[1] Reference ID: 2b-016-20140306

2. Relevant retail policy and evidence base

Core Strategy Policies

2.1. The Core Strategy for Hyndburn was adopted in January 2012. Policies contained within the Core Strategy set out the strategic retail policy matters for the Borough. Specifically there are five policies within the Core Strategy directly relevant to retailing and town centres. These are discussed briefly in turn below.

Policy BD1: The Balanced Development Strategy

2.2. Policy BD1 establishes the general growth and development principles for Hyndburn. In relation to retailing and town centres it states that:

> '*Accrington Town Centre will be the principal centre and will provide for the Borough's key services, retail and town centre needs. Great Harwood will develop as a historic market town where new retail and town centre uses will be supported in the Town Centre provided it is at an appropriate scale. Rishton Town Centre will be strengthened and enhanced as a local centre to provide key services to the local community.'*

2.3. The Key Diagram linked to Policy BD1 confirms that the other district centres identified in the Borough include Oswaldtwistle and Clayton-le-Moors

Policy A2: Accrington Town Centre

2.4. Policy A2 sets the more detailed strategy for the Borough's primary centre. It states that:

> '*Accrington Town Centre will consolidate and develop as the principal centre and historic market town, providing for the Borough's key services and comparison food retailing needs. Independent retailers will provide for specialist/leisure shopping needs for the Borough.*
>
> *New comparison and convenience (including food) retailing will be focused in Accrington Town Centre. Existing and future day to day shopping needs will be met in town, township and neighbourhood centres and, at an appropriate scale, in sustainable locations where there are identified deficiencies.'*

2.5. Further policy guidance for Accrington is provided through the Accrington Area Action Plan (AAAP), see below

Policy A3: Development of Local Centres in Accrington

2.6. Policy A3 clarifies the policy objective for the smaller centres of Clayton-le-Moors and Oswaldtwistle. It states that:

> *'The centres of Clayton-le-Moors and Oswaldtwistle will be developed for a range of facilities to support their local communities.'*

Policy GH2: Great Harwood Town Centre

2.7. Policy GH2 sets the more detail strategy for the Borough's second centre. It states that:

> *'Great Harwood Town Centre will develop as a historic market town providing key local services and specialist/leisure shopping facilities for the northern part of the Borough. The historic character and identity of the Town Centre will be protected and enhanced.*
>
> *New, small scale, retailing will be permitted within the Town Centre and existing and future day to day shopping needs will be met provided it is at an appropriate scale, in sustainable locations where there are identified deficiencies.'*

Policy R2: Rishton Local Centre

2.8. Policy R2 sets the more detailed strategy for Rishton. It states that:

> *'The character and identity of Rishton will be supported by strengthening and improving the quality of the street scene in Rishton centre. The centre will be strengthened and enhanced as a local centre to provide key services to the local community.'*

Accrington Area Action Plan Policies

2.9. The Accrington Area Action Plan (AAP) was adopted at the same time as the Core Strategy in January 2012. Policies contained within the Accrington AAP set out the detailed town centre strategy for Accrington and detailed policy matters covering all aspects of town centre policy. In total there are 31 policies within the Accrington AAP which directly or indirectly relate to town centre health and its future management. Specifically in relation to retail, the key policies are ATC1, ATC2 and ATC3. These are summarised briefly below.

Policy ATC1: New and enhanced shopping facilities

2.10. Policy ATC1 provides the policy framework for which proposals for new (or regenerated retail floorspace within the town centre will be assessed. It states that:

'The Council will work with private sector land and property owners and support the following subject to assessment criteria and guidance of PPS4:

- *The provision of additional comparison retail floorspace in larger floor plates within the Primary Shopping Area of the town centre, specifically the Arndale and Broadway; (Proposal Sites 4, 23, 30 & 33)*
- *The provision of additional convenience retail in the town centre; (Proposal Sites 1a, 4 & 30)*
- *The enhancement of the retail offer/quality and improve the vitality and viability, meeting the needs of retailers and catchment area shoppers to maintain Accrington Town Centre's role and status as a key centre in Pennine Lancashire;*
- *The support for existing and future independent retailers;*
- *The retention of a mix of floor plates with the Primary Shopping Area and require a mix of floor plates within significant new retail development;*
- *The maintenance and enhancement of the character of shopping streets; and*
- *The creation of clearer pedestrian retail circuits*

Policy ATC2: Shopping frontages and the use of floors above shops

2.11. Policy ATC2 sets out the detailed criteria in relation to proposals along primary, secondary and other frontages. The policy is not replicated here due to its length and detail, however it should be read in conjunction with Appendix 3 of the Accrington AAP which sets out the location of the active shopping frontages within the town centre

Policy ATC3: Markets and street stalls

2.12. Policy ATC3 reasserts the Council's commitment to supporting and enhancing the market retail sector. The policy states that:

'The Council will:

- *Retain and enhance the Victorian Market Hall and associated Pavilions through its role in managing and licensing of the markets;*
- *Encourage the use of temporary well-designed and well sites market stalls to add diversity to the town centre.'*

Development Management DPD policies

2.13. The emerging Development Management (DM) DPD forms the next stage of the Hyndburn Local Plan to be adopted. The DM DPD sets the detailed policy framework that will be used for the determination of planning applications in Hyndburn.

2.14. The DM DPD has undergone various stages of consultation to date, the latest of which was a Consultation Draft in February/March 2016. Based on representations received during the consultation period, and the findings of the most recent evidence base documents (including the Retail Study and this note), the Council intend to produce the 'Publication' DM DPD ready for final consultation in September 2016, prior to Submission to the Secretary of State.

2.15. The Consultation Draft contains three key policies in relation to retail matters, DM3, DM4 and DM5. As the policies remain draft at this stage the specific wording is not included here, however the broad aim of each policy is set out below.

Draft Policy DM3: Town Centre Development

2.16. Policy DM3 is intended to provide the more detailed policy guidance to expand upon policies A3, GH2 and R2 of the Core Strategy. It provides the detailed criteria against which future in-centre and out-of-centre proposals for new retail are proposed to be assessed. This includes draft retail impact thresholds which, at the time, were based on a relatively simplistic assessment of existing town centre size and composition only (see Town Centre Surveys below).

2.17. At the time of publication of the Consultation Draft, this was the only up-to-date evidence available to the Council on retailing matters. The recently published Hyndburn Retail Study and this evidence note will both now be key inputs into the update and revision of this policy prior to Publication of the DM DPD.

Draft Policy DM4: Retail Frontages

2.18. Policy DM4 provides proposed specific detailed guidance in relation to identified retail frontages, in particular for those centres other than Accrington (which is covered by its own frontage policy in the Accrington AAP: ATC2).

Draft Policy DM5: Hot Food Takeaways

2.19. Policy DM5 provides a proposed criteria-base policy framework for the restriction of new Hot Food Takeaways, including in certain locations of the borough.

Town Centre Surveys

2.20. In 2015 the Council undertook extensive surveys of the uses of all ground floor units within, and on the edge of, each of the five identified centres in Hyndburn (Accrington, Great Harwood, Rishton, Clayton-le-Moors and

Oswaldtwistle). Surveys focused on units that were within, or their previous use was for, a ‘main town centre use’ in line with the NPPF definition.

2.21. The surveys noted the occupant, the planning use class and more detailed category and code classifications to enable very detailed analysis and querying of the data to take place. The area (floorspace) of each unit was also recorded as the survey data was mapped on the Council’s GIS system.

2.22. The 2015 surveys will act as a useful baseline of information on the size and composition of the town centres for future monitoring purposes. The surveys have also been used in the latest Retail Study prepared by Peter Brett Associates, discussed below.

Retail Study 2016

2.23. In December 2015 the Council commissioned Peter Brett Associates to undertake a Retail Study for Hyndburn, to provide a robust evidence base for the preparation of the Hyndburn Local Plan (the emerging DM DPD and the forthcoming Site Allocations DPD). The Retail Study was published in June 2016 and provides:

- A summary of national and local retail planning policy alongside an overview of national trends in retailing and retail development and their implications for Hyndburn;
- Health checks and performance assessments of the five main centres;
- An overview of current shopping patterns in the Borough, based on a new survey of 600 households, and the identification of existing market shares for defined centres and other destinations;
- A quantitative assessment of retail floorspace requirements in both convenience and comparison goods sectors up to 2033, taking into account the latest population and expenditure data, and the effects of multi-channel retailing (e.g. online shopping); and
- Policy recommendations in respect of potential threats to the future health of Hyndburn’s defined centres.

2.24. The findings from the Retail Study are used and referenced as appropriate in Section 3 below.

3. Local threshold considerations

3.1. National Planning Practice Guidance clarifies that the national floorspace threshold above which retail impact assessments will be required is 2,500 square meters. It goes on to state important considerations in setting locally appropriate retail floorspace thresholds, and these are now considered in detail below.

Scale of proposals relative to town centres

Floorspace as a whole

3.2. The total gross retail floorspace by each centre, broken down by convenience and comparison goods retailing[5], is set out in Table 3.1 below. These figures are taken from the comprehensive town centre surveys undertaken by Hyndburn Borough Council in 2015, and detailed in Section 2 of this note. The survey areas are based upon the full extent of the ground floor area of all units in 'main town centre use'[6] within the boundary of each centre – the boundaries reflect those set out in the Council's Local Plan.

Table 3.1 – Retail floorspace in centres (total gross)

Centre	Floorspace (sq.m)		Total
	Convenience	Comparison	
Accrington	2,710	20,479	23,189
Great Harwood	460	2,464	2,924
Rishton	100	556	656
Oswaldtwistle	1,920	1,998	3,918
Clayton-le-Moors	541	212	753

3.3. It is clear that Accrington is by far the largest retailing centre in the Borough, with a total of over 23,000sq.m retailing floorspace, the majority of this (almost 90%) being comparison goods retailing. Oswaldtwistle is the second largest centre with around 4,000sq.m of retailing floorspace within the designated centre (balanced evenly between convenience and comparison goods sectors). Great Harwood has around 3,000sq.m of retailing in total, the majority (around 85%) being comparison goods. The other two centres of Rishton and Clayton-le-moors are significantly smaller retailing centres, each having less than 1,000sqm of combined retail floorspace.

[5] The definition of 'Convenience' goods includes products bought on a regular basis such as food and drink, tobacco, newspapers and periodicals and non-durable household goods. 'Comparison' goods include any other goods such as clothing, shoes, furniture, household appliances, books, games and toys etc.
[6] As defined in Annex 2 of the NPPF

3.4. The figures presented in Table 3.1 above reflect the total retail provision within the designated centres only. Some of the centres in Hyndburn have significant edge/out of centre retail provision which, when also taken into account, may reflect a different overall role of that centre. For example Great Harwood has a number of foodstores in edge/out of centre locations which, if taken into account, would likely demonstrate a higher overall retail provision in the town than Oswaldtwistle (though Oswaldtwistle itself has a large comparison retail destination in Oswaldtwistle Mills in an edge of centre location as well). The edge/out of centre retailing provision is discussed further below under the section 'Existing viability, vitality and vulnerability of town centres'.

3.5. Table 3.2 below shows the levels of retailing floorspace that equates to approximately 10% of the total floorspace for each sector, by each centre. The Council considers that a proportion of 10% of the total floorspace of a specific retail goods sector could be potentially 'large' in the context of each town or district centre. This will very much be dependent upon the specific local factors and characteristics of each centre, patterns of expenditure etc. It is however considered to be a potentially useful trigger point to consider in more detail any likely impacts through the development management process, due to the potential turnover of a proposal exceeding 10% of existing floorspace in a centre, and possible patterns of trade diversion that may occur.

Table 3.2 – Retail floorspace in centres (10% of total gross)

Centre	Floorspace (sq.m)		Total
	Convenience	Comparison	
Accrington	270	2,050	2,320
Great Harwood	50	250	300
Rishton	10	60	70
Oswaldtwistle	190	200	390
Clayton-le-Moors	50	20	70

3.6. Therefore within the context of the floorspace figures presented in Table 3.2 above, the Council's view is that a convenience retail scheme of around 300 sq.m gross or more for Accrington would be considered 'large' (in terms of existing provision in the town); for Oswaldtwistle a scheme of 200 sq.m gross or more would be considered 'large'; for all other centres proposals of only 50 sq.m (due to the very low provision in those centres at present) would be considered 'large'.

3.7. Due to the more prevalent nature of comparison goods retailing in most centres, the thresholds for comparison retailing proposals considered 'large' are generally higher. For Accrington, proposals of around 2,000 sq.m gross and above would be considered 'large; in Great Harwood proposals of 250 sq.m gross or more; Oswaldtwistle 200 sq.m gross or more; and the remaining centres of Rishton and Clayton-le-Moors around 50 sq.m gross or more.

Typical unit sizes

3.8. The breakdown of unit size by each centre is set out in Table 3.3 below. These have not been split into convenience and comparison units due to the small number of units in the smaller centres. The data in general highlights that the stock of retail property in Hyndburn is very much dominated by smaller units with no in-centre units of over 2,500 sq.m evident in any of the designated centres.

3.9. As would be expected Accrington has the largest unit sizes with a total of 22 units (equivalent to 4% of the total) of 500 sq.m or over, 8 of which are over 1,000 sq.m, reflecting its role as the primary shopping centre in the Borough. Only Great Harwood and Oswaldtwistle otherwise have units of over 500 sq.m, each centre only having 2 units each (equivalent to approximately 2% of the total units), one of 500-750 sq.m and one of 750-1,000 sq.m.

Table 3.3 – Gross retail unit size by centre (number and % of units)

Centre	Gross floorspace (sq.m)							
	< 50	50-100	100-250	250-500	500-750	750-1,000	1,000-2,500	Total
Accrington	133 (26%)	189 (36%)	138 (27%)	36 (7%)	10 (2%)	4 (1%)	8 (1%)	**518**
Great Harwood	34 (27%)	57 (46%)	27 (22%)	5 (4%)	1 (1%)	1 (1%)	-	**125**
Rishton	8 (23%)	17 (49%)	8 (23%)	2 (6%)	-	-	-	**35**
Oswaldtwistle	5 (4%)	81 (70%)	25 (22%)	3 (3%)	1 (1%)	1 (1%)	-	**116**
Clayton-le-Moors	9 (35%)	6 (23%)	7 (27%)	4 (15%)	-	-	-	**26**

3.10. Based upon the sizes of existing units outlined above, the Council considers that the following scale of proposals should be considered 'large' in the context of unit sizes. As with the figures set out in Table 3.2, these are simply intended to act as a guide as to a potentially useful trigger point to consider in more details any likely impacts through the development management process. We use these in conjunction with other factors presented later on in this advice note to make final recommendations on suitable impact thresholds.

Table 3.4 – Assessment of 'large' unit size by centre (gross)

Centre	Floorspace (sq.m)
Accrington	750
Great Harwood	500
Rishton	250

Oswaldtwistle	500
Clayton-le-Moors	250

Existing viability, vitality and vulnerability of town centres

3.11. The Hyndburn Retail Study (completed in June 2016) provided an up to date, comprehensive health check assessment of the five town and district centres in Hyndburn. The health checks considered a wide range of indicators and a summary of the key findings for each centre are set out below

3.12. **Accrington** – '*In summary, Accrington is the principal town centre within Hyndburn and benefits from good accessibility and some attractive historic assets. However, it is evident that the town centre is struggling on a number of indicators of vitality and viability. Its vacancy rate is significantly higher than the UK national average and the proportion of comparison retail outlets is also well below the national average. Representation from national operators is limited and has been further undermined by the loss of the anchor Marks & Spencer store at Broadway. We also note that whilst service sector uses account for a high proportion of commercial premises within the town centre, the important food and drink sector is significantly under-represented, and those outlets that are present cater for the lower end of the market*' (paragraph 3.28).

3.13. **Great Harwood** – '*Great Harwood Town Centre provides a good convenience retail offer (when well-connected edge-of-centre provision is also taken into account) and a reasonable range of services. However, its comparison retail offer is limited and the town centre suffers from above average levels of vacant property. The town centre is generally accessible and safe but would benefit from new investment in the building stock*' (paragraph 3.41)

3.14. **Rishton** – '*Rishton is a small town centre that seeks to serve the day-to-day shopping needs of its immediate residential catchment. The town centre has an adequate provision of small, independent convenience retailers and vacancy levels are relatively low. There is also a reasonable provision of local services. However, the comparison retail offer of the town centre is limited, there are no banks or building societies, and the environmental quality of the town centre is poor*' (paragraph 3.50)

3.15. **Clayton-le-Moors**- '*Overall, we consider the district centre at Clayton-le-Moors to be performing reasonably well, although, in our view, it size and role are more akin to that of a local or neighbourhood centre than a district centre. The centre has a comparatively low vacancy rate and provides an adequate, if limited, range of day-to-day shops and services. The centre is well maintained but may benefit from measures to increase its visibility from Whalley Road*' (paragraph 3.54)

3.16. **Oswaldtwistle** – '*Overall, Oswaldtwistle is an accessible centre which has a good convenience retail and service offer. However, the centre suffers from its elongated layout which disperses retail activity and footfall. The centre would* *also benefit from some investment in the building stock and improvements to both the quantity and quality of the comparison retail offer*' (paragraph 3.62).

3.17. On the basis of the health check summaries above, and the more detailed analyses presented in the 2016 Retail Study (including consideration of the existing quantum and proportion of 'in-centre', 'edge-of-centre' and 'out-of-centre' retailing), an assessment of the specific vulnerability of each centre from further edge or out of centre retail development is set out in Table 3.5 below. We take these conclusions into account in the final recommendations on appropriate floorspace thresholds set out in Section 4.

Table 3.5 – Potential 'vulnerability' to new edge/out-of-centre development

Centre	Convenience	Comparison
Accrington	High	High
Great Harwood	High	High
Rishton	Low	High
Oswaldtwistle	Low	Low
Clayton-le-Moors	Low	Low

Cumulative effects of recent developments

3.18. The Council monitors planning permissions and completions on an annual basis and this data is useful when considering whether to set local floorspace thresholds as it provides an indication of the general scale and trends of recent retail activity in the Borough. Monitoring data is currently available going back to 1st April 2010. Table 3.6 below summarises applications for retail that have been permitted over a 5-year period between April 2010 and March 2015.

Table 3.6 – Location of retail permissions granted in Hyndburn between 2010-2015 (Count)

Location	Count of planning applications				
	In Centre	Edge-of-centre	Out-of-centre	Out of Town	Total
Town/District Centre					
Accrington	6	5	6	-	**17**
Great Harwood	1	1	2	-	**4**
Rishton	2	3	-	-	**5**
Oswaldtwistle	1	2	1	-	**4**
Clayton-le-Moors	-	-	2	-	**2**
Other					
Peel Centre	-	-	4	-	**4**
Other	-	-	1	1	**2**

Total	10 (26.3%)	11 (28.9%)	16 (42.1%)	1 (2.6%)	38 (100%)

3.19. As demonstrated above, over the last 5 years the location of new retail planning permissions granted have been fairly evenly spread (in terms of the sequential test) across 'in-centre' and 'edge-of-centre' locations across the Borough as a whole and across individual centres. In total 26% of permissions have been located 'in-centre'. 'Out-of-centre' locations form the largest proportion of permissions at 42%. A total of 16 'out of centre' retail permissions have been granted, a quarter of which have been at the Peel Centre (Whitebirk). Only 1 out of town permission has been granted over this period[7].

3.20. However, Table 3.7 provides the breakdown of recent planning permissions granted by floorspace and demonstrates a rather different picture of distribution. Only 8% of the total floorspace granted permission between 2010 and 2015 has been located 'in-centre', with 53% being located in 'out-of-centre' locations.

Table 3.7 – Location of retail permissions granted in Hyndburn between 2010-2015 (Floorspace)

Location	Floorspace (sq. m)				
	In Centre	Edge-of-centre	Out-of-centre	Out of Town	Total
Town/District Centre					
Accrington	811	2,335	356	-	**3,502**
Great Harwood	54	40	165	-	**259**
Rishton	115	460	-	-	**575**
Oswaldtwistle	100	1,728	160	-	**1,988**
Clayton-le-Moors	-	-	2,098	-	**2,098**
Other					
Peel Centre	-	-	3,724	-	**3,724**
Other	-	-	321	350	**671**
Total	**1,080 (8.4%)**	**4,563 (35.6%)**	**6,824 (53.2%)**	**350 (2.7%)**	**12,817 (100%)**

3.21. Although the total number of retail permissions granted in Hyndburn is relatively low (averaging less than 8 per year) the general pressure for out-of-centre retail proposals over the last five years is evidently greater than has been the pressure for new in-centre or edge-of-centre retailing.

3.22. On this basis, and to help support the future vitality and viability of the Borough's centres from cumulative negative effects, it is clearly going to be

[7] located at Moorland Works, Willows Lane, Accrington

necessary to carefully consider the impact of further such developments over time. The latest health checks of the Borough's centres highlight any particular vulnerabilities and are discussed in the previous section.

3.23. The average size of proposals based on the last 5 years of permissions equate to 108 sq.m in-centre, 415 sq.m edge of centre, 253 sq.m out of centre, and 733 sq.m out of town. There is not sufficient data to warrant individual conclusions by centre, however the analysis above leads the Council to conclude that a local floorspace threshold of around 500 sq.m would be sufficient to 'capture' the more significant edge or out-of-centre proposals based on the previous 5 years of permissions. This should ensure that potential solus and cumulative impacts on centres are considered in the context of the evidence on recent developments presented above.

Likely effects of further development on any town centre strategy / planned investment

3.24. Earlier in this evidence note we discussed key qualitative issues that were highlighted in the recently published Hyndburn Retail Study, in particular in terms of the vitality and viability of centres. In this final section we review the quantitative findings of the Retail Study which allows some broad conclusions to be reached on the likely effects of further development across the Borough. We also look at any town centre strategies and planned in-centre investment.

3.25. In respect of convenience goods retailing, assuming the retention of existing market share of expenditure (which is identified as being very high at over 81% within the Hyndburn Study Area), the Retail Study concludes that there is in fact no requirement for new floorspace under the baseline population scenario, and only very modest requirements under the higher population growth scenario. Commitments already granted consent substantially absorbs these modest requirements leaving no further quantitative requirement over the plan period. As such a very conservative approach to whether an impact assessment is required for future retail proposals would seem to be a pragmatic approach (as in effect the study is demonstrating 'saturation' of local expenditure already).

3.26. In terms of comparison goods retailing, the Retail Study (which again assumes the retention of existing market share which is very low at 33%) concludes no requirement for new floorspace up to 2018. However a positive floorspace requirement is identified between 2018 and 2033, equating to around 4,000 sq.m sales area floorspace (around 5,800 sq.m gross) in total by 2033. Although a requirement is identified, it is fairly limited. As such proposals for new floorspace suggests that there is the potential for unacceptable adverse impacts on the more vulnerable centres in particular, from further edge or out-of-town retailing. A relatively conservative approach to impact assessment for future comparison retailing is also therefore considered a pragmatic way forward, and is factored into our 'balanced assessment' set out in Section 4 below.

3.27. In terms of planned investment, as stated in paragraph 3.23 of the Hyndburn Retail Study, for Accrington '*the Council has recently secured funding from the Heritage Lottery's Townscape Heritage Initiative (THI) which will be used to create a new public square outside the Town Hall and Market Hall. Grants will also be available for the restoration of designated historic properties adjacent to the new square*'.

3.28. The THI grant scheme and initiative is considered to be a significant investment for Accrington and to play an important role in enhancing the overall appearance and function of the town centre for the future. The implementation of local retail impact thresholds considered in this evidence note should also help to protect the future health and vitality of the town, and therefore re-enforce and support the investment due to take place.

4. Conclusions / Recommendations

4.1. Guidance contained within the NPPG has been used as a structure to consider the appropriateness of setting local retail impact floorspace thresholds in Hyndburn. This note considers a range of factors including:

- the scale of proposals relative to each town / district centre (looking at floorspace as a whole in centres, and typical unit sizes in each centre)
- the existing viability, vitality and vulnerability of town and district centres in terms of qualitative issues;
- the cumulative effects of any recent developments in the Borough; and
- the likely effects of any further developments on town centre strategies or investments, in the context of quantitative retail capacity in Hyndburn

4.2. Based on the findings set out in Section 3 of this report it is clear that centres in Hyndburn would benefit from having local floorspace thresholds set for assessing the retail impact of proposals for future edge and out of centre developments. Reliance on the nationally set threshold of 2,500sq.m as a trigger point for assessing impact would not be an adequate means of assessing all proposals which could have significance in terms of the health, vitality and viability of the nearest town or district centre.

Convenience Retail

4.3. Table 4.1 below summarises the findings of all factors listed in Section 3 of this note for convenience goods retailing.

4.4. The ‘balanced assessment’ presented at the bottom of Table 4.1 reflects the Council’s view of an appropriate local floorspace threshold for each centre. The ‘balanced assessment’ takes account of all factors discussed in this note and applies a minimum threshold of 250sq.m. A minimum of 250sq.m is recommended to ensure that the burden of impact assessments does not become too great for an applicant or the Council in terms of the proportion of overall applications, and in proportion to any proposed development.

4.5. The thresholds noted in Table 4.1 should be seen as the point at which an impact assessment will *definitely* be required. One of the most significant trends in convenience retailing in recent years (highlighted in the Council’s Retail Study 2016) is a move towards smaller scale convenience stores. These can often be located out of centre. The thresholds proposed should help ensure that the impacts associated with proposals for these developments are properly considered.

4.6. In certain circumstances (where particular concerns arise due to the size and nature of a proposal and/or where local circumstances may have changed) there may be an occasional need for an impact assessment to be undertaken below this threshold level. The Council will seek to bring forward a policy that enables this flexibility to be employed, where the Council can justify any request carefully and a 'proportionate' approach is employed in line with NPPF.

Table 4.1 – Convenience goods threshold – a balanced assessment

Measure	Source	Accring-ton	Great Harwood	Rishton	Oswald-twistle	Clayton-le-Moors
10% of total floorspace (sq.m gross)	Table 3.2	300	50	50	200	50
Unit size assessment (sq.m gross)	Table 3.4	750	500	250	500	250
Vulnerability	Table 3.5	High	High	Low	Low	Low
Recent developments (sq.m sales)	Para. 3.23	500 sq.m				
Likely effects of further development		No current quantitative requirement to 2033, therefore a very conservative approach is required to assessing new proposals				
Balanced assessment (sq.m gross)		**500 sq.m**	**250 sq.m**	**250 sq.m**	**250 sq.m**	**250 sq.m**

Comparison Retail

4.7. Table 4.2 below summarises the findings of all factors listed in Section 3 of this note for comparison goods retailing.

4.8. The 'balanced assessment' presented at the bottom of Table 4.2 reflects the Council's view of an appropriate local floorspace threshold for each centre. As with convenience retailing assessment above, the 'balanced assessment' takes account of all factors discussed in this note and applies a minimum threshold of 250sq.m. This minimum threshold is recommended to ensure that the burden of impact assessments does not become too great for an applicant or the Council in terms of the proportion of overall applications, and in proportion to any proposed development.

4.9. As set out in paragraph 4.6 above, in certain circumstances (where particular concerns arise due to the size and nature of a proposal and/or where local circumstances may have changed) the Council may seek to require an impact assessment below the recommended 'balanced assessment' figures. As such the Council will seek to bring a policy forward for comparison retailing allowing flexibility for such requests where it is considered justified and proportionate.

Table 4.2 – Comparison goods threshold – a balanced assessment

Measure	Source	Accring-ton	Great Harwood	Rishton	Oswald-twistle	Clayton-le-Moors
10% of total floorspace (sq.m gross)	Table 3.2	2,000	250	50	200	50
Unit size assessment (sq.m gross)	Table 3.4	750	500	250	500	250
Vulnerability	Table 3.5	High	High	High	Low	Low
Recent developments (sq.m sales)	Para. 3.23	500 sq.m				
Likely effects of further development		Very limited requirement for new floorspace to 2033, therefore a relatively conservative approach is required to assessing new proposals				
Balanced assessment (sq.m gross)		**1,000 sq.m**	**250 sq.m**	**250 sq.m**	**500 sq.m**	**250 sq.m**