
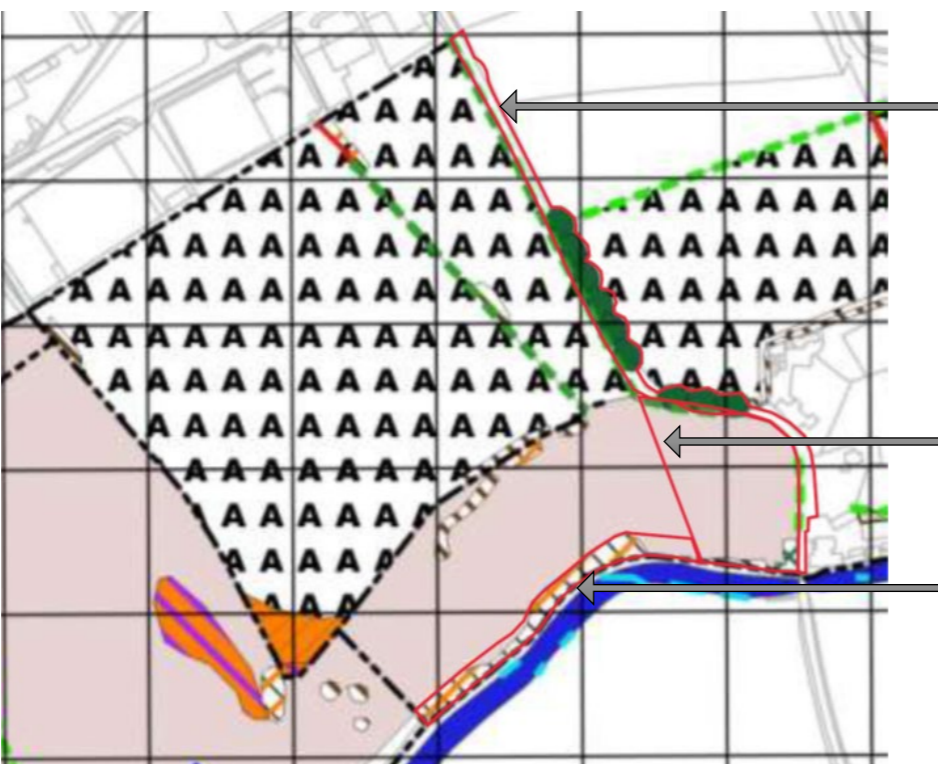
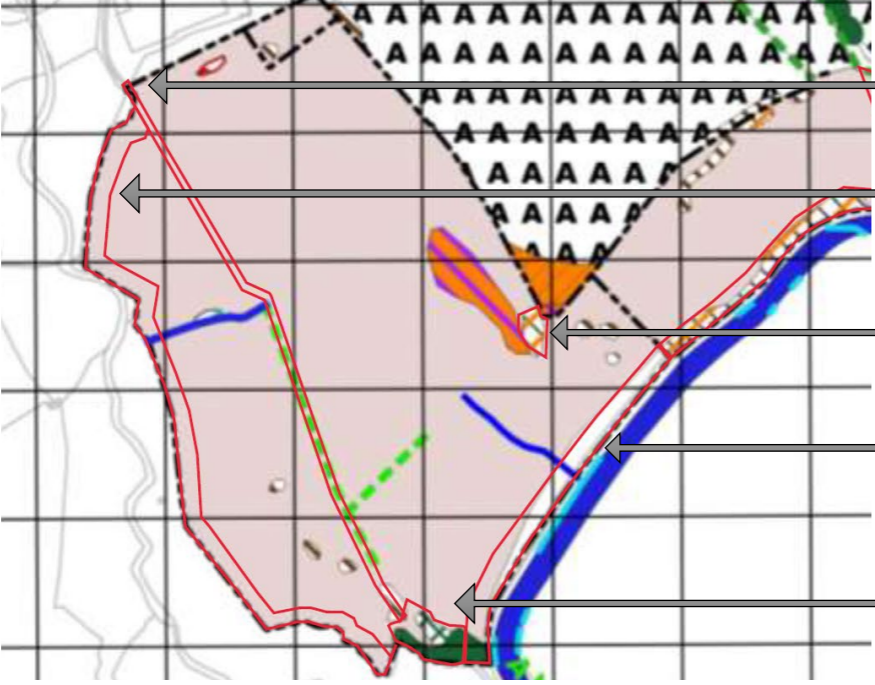



APPENDIX ONE: Developable Constraints of Employment Sites EMP3 EMP4 EMP5 and EMP6

<p>Site EMP3 Site Area: 45.5ha</p>			<p>Note</p>
<p>Existing Site Constraints (edged in red)</p>		<p>Area: 2.86ha Semi-natural broad-leaved woodland; broad-leaved woodland plantation; unimproved neutral grassland; and semi-improved acid grassland near Shorten Brook DWC and canalside.</p> <p>Area: 0.99ha Fish pond with surrounding scrub and semi-nature vegetation surrounding the fish pond. This area is possibly a medieval moated site, which could be of regional and national significance.</p> <p>Area: 0.06ha Retention of existing PRoW (FP1107028)</p> <p>Area: 0.503 15m buffer from the Leeds & Liverpool Canal</p> <p>Area in total: 4.413ha</p>	<p>Habitats Survey (2019): Vegetation interest largely localized to the area around the fishing pond, and the area of acid grassland near Shorten Brook DWC, including the area of acid grassland, and along the canalside. Habitats Survey (2019) notes that it is desirable to retain the hedgerows and fishing pond, the semi-natural vegetation surrounding the fish pond and at least a broad strip of grassland alongside Shorten Brook DWS, including the areas of acid grassland along the canalside.</p> <p>Archaeological Study (LCC Historic Environment 2023) PRN1983 – A possible medieval moated site which would be of regional/national significance and could therefore, depending on its date and preservation, be one that might merit designation.</p> <p>The existing PRoW is to be retained and enhanced</p> <p>The provision of a 15m buffer zone between the Leeds-Liverpool Canal and the developable area of the site to ensure the structure integrity of the waterway infrastructure, and to protect the access to, along and from the waterway.</p>
		<p>Area: 0.65ha The existing access road (Altham Lane) and the native species-rich hedge and trees along the access road will be retained.</p> <p>Area: 1.12ha Appropriate landscape buffers in areas visible from the Grade II Canal Bridge to avoid dominating the views in the wider setting, and to maintain linear view along the canal.</p> <p>Area: 0.4ha Provision of 15m buffer from the Leeds & Liverpool canal, and the retention of semi-improved acid grassland as recommended by the Habitats Survey (2019)</p> <p>Area in total: 2.17ha</p>	<p>Habitats Survey (2019): Good length of hedgerow along roadside and between two of the fields. It is desirable to retain hedgerows, surrounded by a good buffer of semi-natural vegetation, and ideally a broad strip of grassland alongside the canal.</p> <p>HBC Heritage Impact Assessment (Growth Lancashire, 2025): The setting of the Grade II listed Canal Bridge compromised by B1/B2 use class development which will result in loss of open aspect to the southwest of the Site EMP3 and glimpsed areas of the SE section. At master planning stage, it is required to preserve the appreciation of the asset within the wider landscape setting. Further appropriate landscape buffer should be considered in the area visible from the bridge to avoid dominating the views in the wider setting, and to maintain linear views along the canal.</p>


Developable Constraints of Employment Sites EMP3 EMP4 EMP5 and EMP6

		<p>Area: 0.34ha Existing PRoW FP1107042 to be retained</p> <p>Area: 0.94ha 15m buffer zone to be created adjacent to Altham Clough Wood BHS</p> <p>Area: 0.07ha Existing semi-improved grassland to be retained</p> <p>Area: 0.57ha 15m buffer zone to be created adjacent to the Leeds & Liverpool Canal, enhanced by appropriate conservation management</p> <p>Area: 0.2ha Desirable to retain the small woodland area (which connects to further woodland in the adjacent BHS)</p> <p>Area in total: 2.12ha</p>	<p>The existing PRoW is to be retained and enhanced for the continuous enjoyment of the public and provide public vantage points towards the Altham Clough Wood from the east side of Altham Clough Brook. 15m buffer to be formed along the Altham Clough Wood BHS to provide a separation from Altham Clough Wood BHS and the Brook, to allow natural expansion of woodland into more species-poor grassland area.</p> <p>15m buffer zone is to be formed along the Leeds & Liverpool Canal to ensure the structure integrity of the waterway infrastructure, and to protect the access to, along and from the waterway.</p> <p>Habitats Survey (2019) and Archaeological Assessment (2023) have identified this wooded hamlet provides links to more extensive woodland; and the small hamlet/farmstead recorded as Head o 'th' town on 1st Edition OS survey. Remains are visual on the current aerial photographs of the site. It is considered to be a site of local significance.</p>
		<p><u>Total Area of EMP3: 8.70ha</u></p>	

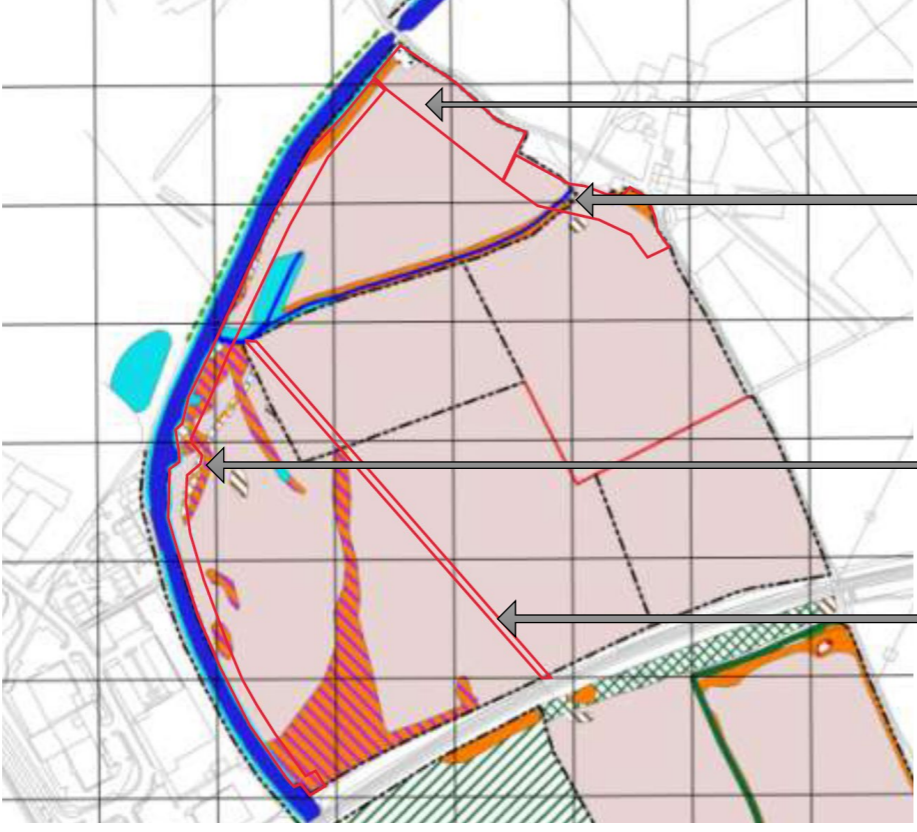
Developable Constraints of Employment Sites EMP3 EMP4 EMP5 and EMP6

<p>Site EMP4 Site Area: 4.0ha</p>			<p>Note</p>
<p>Existing Site Constraints (edged in red)</p>	 <p>Area: 1.52ha A landscape buffer is to be created to preserve the settings of the Grade II listed Whitebirk Moss Farmhouse and Whitebirk North Cottage (as shown as)</p> <p>Area: 0.2ha The area is undevelopable due to the presence of overhead pylons.</p> <p><u>Total Area: 1.72ha</u></p>		<p>HBC Heritage Impact Assessment (Growth Lancashire, 2025): Whitebirk Moss Farmhouse and Whitebirk North Cottage are two Grade II listed buildings situated on the northwest side of A678 (Blackburn Road) directing opposite Site EMP3.</p> <p>Whilst the wide setting of these heritage assets has been compromised by major road infrastructure and moder commercial development to the northwest, the remaining open landscape surrounding the site makes a moderate positive contribution toto the buildings. As such, development of Site EMP3 in the close proximity, could adversely affect the setting and views towards these designated heritage assets. The HIA recommends that it is essential to preserved appreciation of the assets within the wider landscape setting.</p> <p>Therefore, the layout, scale and density of the future development will dictate the visual impact and direct frontage development should be avoided.</p> <p>In light of the findings of the HIA, an extensive landscape buffer is to required in this instance to preserve the settings of the designated heritage assets.</p>

Developable Constraints of Employment Sites EMP3 EMP4 EMP5 and EMP6

<p>Site EMP5 Site Area: 18.1ha</p>			<p>Note</p>
<p>Existing Site Constraints (edged in red)</p>		<p>Area: 0.50ha Existing field margins arounds the northeast field provided foraging for S41 starling</p> <p>Area: 3.20ha Existing woodland to be retained and enhanced through appropriate conservation woodland managements</p> <p>Area: 4.24ha No development in the area below the electrical pylons</p> <p>Area: 0.15ha 15m buffer zone from the Leeds & Liverpool canal</p> <p>Area: 1.11ha Formation of a landscaped buffer zone around the complex of Whitebirk North Cottage to preserve and protect setting of the Grade II listed Whitebirk Moss Farmhouse and Whitebirk North Cottage.</p> <p>Area: 0.17ha Native species-rich hedge and trees along the southwest road frontage of the site to be retained.</p> <p><u>Total area: 9.37ha</u></p>	<p>Habitats Survey (2019): Semi-improved field margins around the northeast field provided foraging for S41 starlings. While improved pasture would normally have minimal biodiversity values, the canalside location of this site means that these fields are likely to be used by grazing ducks and geese. It is therefore desirable to retain hedgerows, the woodland (with appropriate conservation management to improve strcutre, tree age-diversity and species composition) and at the grassland nearest the canal, with a buffer of vegetation around the woodland and hedgerows. Small-scale development may be acceptable at the eastern end of the site, where this did not disturb or damage the retained habitats.</p> <p>National Grid (Reg19(2) consultation response) Site EMP5 is affected NGET assets including 4ZP ROUTE TWR (020-048A): 400Kv overhead transmission Line route: KEARSLEY-PADIHAM 4ZP ROUTE TWR (02-020): 400Kv overhead transmission Line route: KEARSLEY-PADIHAM Without appropriate acknowledgement of the NGET assets present within the site, these polices should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posted by the presence of NGET infrastructure.</p> <p>HBC Heritage Impact Assessment (HIA, Growth Lancashire 2025): The scale and density of new development will be important. Level of development on the higher visible ground and directly adjacent or behind the listed building will need to be avoided and sensitive master planning and/or design works will be needed to avoid the new development dominating the immediately views directly behind the listed building, especially when viewing the listed building from Blackburn Road</p>

Developable Constraints of Employment Sites EMP3 EMP4 EMP5 and EMP6

<p>Site EMP6 Site Area: 20.6ha</p>			<p>Note</p>
<p>Existing Site Constraints (edged in red)</p>		<p>Area: 0.52ha A 50m wide buffer zone between the developable area of the site and the Canal Bridge 106 (Grade II listed)</p> <p>Area: 0.39ha A 25m wide buffer zone between the developable area of the site and the farmstead of Higher Side Beet Farmhouse (Grade II listed building)</p> <p>Area:0.99ha Provision of 15m buffer zone between the developable area of the site and the Leeds & Liverpool Canal</p> <p>Area: 0.24ha No development in the area below the electrical pylons</p> <p><u>Total Area: 2.14ha</u></p>	<p>HBC Heritage Impact Assessment (HIA, Growth Lancashire 2025): Development should be kept away from the boundary with the canal and sufficient space/landscaping providing to avoid impinging on the linear view and enjoyment/use of canal. Visual impact on canal network will need to be fully considered in the master plan.</p> <p>Further, given the presence of the Grade II listed Higher Side Beet Farmhouse on the opposite side of Sidebeet Lane, the layout needs to retain the visual connection and some sense of openness between the land and farmhouse, limiting development in the area directly adjacent to the listed building. Development should be limited in scale/density on the more elevated parts of the site to avoid dominating wider landscape views.</p>

Summary:

Paragraph 4.22 of the Submission Draft Local Plan 2040 notes that the Housing and Economic Need Assessment (HENA) updated in 2021 for BwD and Hyndburn Council highlighting the importance to Pennine Lancashire of planning for growth to ensure job creation and economic prosperity. The HENA confirms that an appropriate employment land requirement to plan for in Hyndburn, based on an aspiration but realistic growth scenario, is 70 hectares of land during the plan period.

Policy SP4 of Submission Draft Local Plan 2040 indicates that the total area of six proposed employment allocation sites is to 94.4ha in total, which include four strategic sites (Site EMP3, EMP4, EMP5 and EMP6) currently falls within the designated Green Belt, and their total cumulative site area of Site EMP3, EMP4, EMP5 and EMP6 amounts to 88.24ha.

During the course of the Reg 19 Local Plan consultation, one of the neighboring authorities have noted that the total area of the proposed employment allocation site exceeds the 70ha, which exceeds the identified needs for 70ha employment lands as suggested by the HENA, and argued that the excessive level of releasing Green Belt land is unjustified. In response, we would like to highlight the Draft Hyndburn Local Plan 2040 (paragraph 4.18) has acknowledged that 'the total areas of the proposed allocation sites 'only represent the entire gross site area including land which will not subject built development; the net developable areas will be much lower'. To provide a clearer understanding on the developable areas of the proposed employment allocation for the purpose of the Local Plan Examination, HBC have undertaken assessments for the four proposed allocation sites situated within the designated Green Belt to identify the areas subject to material constraints for future developments as evidenced in the relevant Local Plan evidence reports (e.g. Habitats Survey, HIA, Archaeological Studies, Canal & River Trust, etc) and the consultation responses received during the course of the Reg 19 Local Plan consultation. Consideration has also been afforded to the presence of key infrastructures such as electric powerlines and PRoWs.

As illustrated in the assessments in the Tables above, the total areas subject to the key development constraints amounts to circa **21.93ha**, bringing the total deliverable employment lands area down to **72.47ha**. It is also worth highlighting that key planning/design factors such as the provision of on-site BNG mitigation zone, landscaping buffer, internal access road, infrastructures for surface water management/drainage solution and SuDs haven't been taken into consideration in this assessment. There is no doubt that the provision of those elements at the detailed design stage will further affect the total developable areas of the proposed employment allocation sites. The progress and delivery of those site will be updated and discussed in greater details in the AMRs following the adoption of the Local Plan.