

Matter 4: The Economy and Town Centres		
Issue 4: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for employment land and town centres in Hyndburn?		
The Economy and Town Centres	1. Does the Plan set out a clear economic vision and strategy which encourages sustainable economic growth?	<p>Yes, The Local Plan integrates a clear economic vision throughout the plan and its policies. The plan specifically sets this out through:</p> <ul style="list-style-type: none"> • The vision – Paragraph 2.1 sets out the vision which summarises the economic ambitions of Hyndburn. • Strategic Objective 1 – including the supporting text from paragraphs 2.4 to 2.14. • Strategic Policies SP4 – SP7. • Policies on the economic vision and strategy are also covered through the adopted Development Management plan (H001). <p>The plan identifies strategic employment hubs at Altham and Whitebirk alongside allocations that deliver a balance of employment uses and complementary town centre uses. The strategy also supports the regeneration of Accrington and other centres while strengthening the role of Hyndburn in the wider Pennine Lancashire economy.</p> <p>The plan encourages sustainable economic growth. This is evidenced through the independently completed Integrated Impact Assessment (HBC2.010a), which summarises all the plan effects, when viewed in combination, on the Employment and Economy as likely to be of a significant positive effect (summarised in table 5.15 of HBC2.010a).</p>
	2. The assessment of employment growth set out in the Housing and Economic Needs Assessment 2021 (HBC2.003b), forecasts an employment land need of 59 ha over the period 2021-2037, updated in the Employment Land Background Paper (HBC8.002) to 70ha to 2040? Is this justified by the evidence?	<p>Yes, to meet the requirements of a 15-year plan post adoption the Council has looked to extend the plan period from 2037 to 2040. Because of this the Council has looked to update projections for the remaining three years of the plan. The Council has taken a pragmatic and proportionate approach to updating the required need and has undertaken a yearly average increase from requirement identified in the HENA 2021 update (HBC2.003b) for the plan period to 2037, this is set out in the Background paper Employment Land (HBC8.002) in paragraph 2.41.</p>

Matter 4: The Economy and Town Centres

		<p>The Council considers that the evidence unpinning the HENA 2021 provides a robust and justified assessment and do not believe that there is significant evidence that there would be significant change in the long-term trends of requirements in the three years from 2037-2040 that could reasonable foreseen or quantified.</p> <p>The Council also recognises that any concerns around the evidence for the final three years of the plan period can be mitigated by the requirements to undertake regular reviews of local plans. The Council commits to reviewing the plan every 5 years reducing any potential risk further.</p>
	<p>3. What evidence is there that the target of 70ha of employment land over the Plan period is deliverable, bearing in mind past completion rates?</p>	<p>The Council acknowledges that past completion rates for employment land have been low with only 2.91 hectares delivered in since 2021. Table 9.6 of the HENA (2021) (HBC2.003b) shows a completions forecast of 26.6ha up to 2037, which can be extrapolated to 31.1ha up to 2040.</p> <p>The Council however consider that the past completions data is constrained by the availability of suitable land for modern employment purposes. The Employment Land Studies (HBC3.001a and 3.001e) show that the overall quality of employment land is largely consisting of poor and adequate sites, highlighting the current reliance on lower quality sites and premises in less commercially attractive locations. Hyndburn’s supply of employment land is not evenly balanced in terms of overall quality, with too little good quality land available, and too much constrained land, emphasising the historically low rates of delivery compared to the requirements set out in this plan. It is considered that such sites should not be relied upon in isolation and failing to address the current imbalances in the supply may result in further losses of employment or investment, as businesses choose to meet their needs outside of the Borough.</p> <p>The identified need from the HENA 2021 (HBC2.003b) shows 96% of employment land required is needed for either industrial or warehousing purposes requiring larger sites often removed from residential areas. The proposals in the plan to remove land from the Green Belt is considered to provide opportunities that are not currently available and will remove the blockage to the delivery of modern, quality employment land. The is further set out in the Background paper employment land (HBC8.002) in sections 1.3 and 1.4.</p>

Matter 4: The Economy and Town Centres

		<p>The Council can also highlight strong market demand through developer interest at the proposed allocated sites which is supported in landowner engagement and market attractiveness reports shown in appendix 1 and 2 of the Background paper on employment land (HBC8.002).</p> <p>The Council are also keen to emphasize the aspirational element of employment land delivery is supported through the requirements in the NPPF including paragraphs 16b which states that plans should be prepared positively, 11a which states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change and 81d that states policies should be flexible enough to accommodate needs not anticipated in the plan.</p> <p>Therefore, given the combination of factors set out above the Council considers that there is justified evidence for the target of 70 ha of employment land over the plan period.</p>
	<p>4. What is the identified supply of new employment land/floorspace over the Plan period? Should this be set out clearly in the Plan?</p>	<p>The Council believes that the supply of new employment land is set out in table 1 of the supporting text to Policy SP4, with allocations totalling the required 70ha. The Council has proposed a main modification through Matter 4 Question 15 to better reflect the gross and net requirements.</p>
	<p>5. What assumptions have been made in assessing the availability and capacity of land for employment use? Does that include the potential to intensify the use of existing employment land? Conversely, has the potential loss of employment land to other uses been assessed and taken into account?</p>	<p>The HENA (2021) (HBC2.003b), Employment Land study (2019) (HBC3.001e) and the employment land background paper (HBC8.002) provide a robust and comprehensive assessment of employment land needs in Hyndburn. The assumptions made in assessing the suitability of employment sites is set out in the Site assessment and selection paper (HBC8.003).</p> <p>The Employment Land Study has identified the current quality of current existing employment uses. The study identifies several poor performing employment uses, and identifies that much of the current stock is constrained in providing adequate provision of modern employment land, this means that on a number of sites it is unlikely that the intensified of uses would provide an adequate means to increase employment land capacity.</p> <p>Policy SP5 seeks to retain all good quality sites in employment use over the plan period. Sites considered to be adequate have potential for continued or enhanced employment</p>

Matter 4: The Economy and Town Centres

		<p>uses and so redevelopment proposals will be required to provide an element of modern employment use to compensate for the loss of existing employment land. This will help to ensure that the Borough's employment sites are steadily modernised while retaining a mix of uses within the existing urban areas.</p> <p>The 2021 HENA Update highlights a substantial historic loss of industrial and warehousing floorspace, which has placed pressure on the existing supply and reduced market flexibility. In response, it recommends that "a higher range for industry and warehousing would be justified to increase choice in the market and ensure that the impact of historic and future losses is minimised.". The Council considers that this has been effectively considered in accounting for the required employment need figures in the plan.</p>
	<p>6. What flexibility has been built into employment need and employment land supply calculations? Has this included a buffer to account for forecasting variation and market choice? If so, what assumptions have been made and are these justifiable? Has a buffer been included in forecast demand or supply, or both?</p>	<p>The HENA (2001) (HBC2.003b) has included a further 5 years of gross completions to the labour demand needs as a buffer as set out in paragraph 9.5. This is to account for forecasting variation and market choice and is considered to be a common practice when accounting for need.</p> <p>The Council has not set out any buffer in relation to the employment land supply. This is due to the HENA study concluding that 59ha (now 70ha due to the extension of the Local Plan period to 2040) is a reasonable level of growth to plan for but a higher range for industry and warehousing would be justified to increase choice in the market and ensure that the impact of historic and future losses is minimised (para 9.26).</p>
	<p>7. To what extent has allocated employment land in Blackburn, including sites on the western fringes of Hyndburn, been taken into account in assessing employment land requirements and demand for sites in Hyndburn?</p>	<p>The cross-boundary relationship with Blackburn has been fully recognised through the Duty to Cooperate and Statements of Common Ground (H10.002). While Blackburn's allocations (particularly at Whitebirk) are acknowledged the evidence set out in the HENA demonstrates no allocated sites from Blackburn with Darwen impact upon the supply of Hyndburn's employment land and the HENA highlights continuing demand within Hyndburn for both logistics and manufacturing uses.</p>

	<p>8. What factors have influenced the strategic distribution of employment land allocations? What alternative strategic sites have been considered and how do they compare to those selected for inclusion in the Plan?</p>	<p>The strategic distribution of employment land allocations has been influenced by the Integrated Impact Assessment (HBC2.010a), Employment Land Study (2016) (HBC3.001a) and its update in 2019 (HBC3.001e) and within the evidence presented in the Background paper for employment land (HBC8.002). The site assessment and selection process undertaken by the council when assessing employment land is also set out in Background paper HBC8.003.</p> <p>The IIA, alongside the growth options and spatial options justification paper (H015) set out the three reasonable alternatives that have been considered (low, medium and high employment growth), with conclusions being drawn on high growth being the preferred option in paragraphs 3.31 – 3.38 of the paper. It was considered that the low growth option was not appropriate as it would not allow for any job growth or new inward investment on employment land, running counter to strategic objectives for the Borough. The medium growth scenario would allow for job growth and investment but the high growth option would not just allow for significant job growth but also provide a greater opportunity for transformational growth as well as fully supporting the ability for existing business to expand and develop and allow for inward investment. This approach closely aligns with the strategic objectives for the Borough (such as those set out in the Corporate Strategy) and allows for a level of flexibility as advocated by NPPF.</p> <p>The Council’s employment strategy has focused on releases of land along the M65 corridor, including the release of strategic employment land at Whitebirk and Altham. The importance of this corridor is recognised by a variety of strategic policy documents including the previous Hyndburn Core Strategy (2012) and the Lancashire Strategic Economic Plan – A Growth deal for the Arc of Prosperity. The M65 is the main route connecting East Lancashire with the M6 and M61 and therefore plays an essential role in the economy of this part of the county, connecting people and businesses internally as well as providing the primary means of access to the M6.</p> <p>The Lancashire Plan states that the Corridor, along with the principal urban towns, supports approximately 80% of East Lancashire jobs. The generation of significant additional employment in East Lancashire was also recognised and could be achieved by</p>
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Matter 4: The Economy and Town Centres

		<p>the delivery of key employment sites located along the M65 Growth Corridor; an area highlighted as having significant commercial growth potential.</p> <p>The provision of strategic employment sites within the M65 Corridor is also a priority of the Pennine Lancashire Growth and Prosperity Plan. The identification of strategic sites for local and inward investment is a key requirement of the NPPF and is an important mechanism for creating a more balanced portfolio of employment land and delivering growth. A continued lack of choice would likely exacerbate supply side pressures and be a major constraint on investment, job growth and the sustainable growth of the local and wider Lancashire Economy. This is further set out in the Background paper for Employment (HBC8.002).</p>
	<p>9. Does the economic strategy support the future vitality and viability of town, district and local centres?</p>	<p>Yes. The strategy specifically supports town centre regeneration, particularly in the main centre of Accrington, through Policy SP6 which ensures an appropriate hierarchy to support town, district and local centres. This is considered to be consistent with paragraph 86 part a of the NPPF.</p>
	<p>10. How does the economic strategy support the sustainable growth and expansion of businesses in rural areas?</p>	<p>Yes. Policy SP5 part 3 provides a general presumption to retain existing sites into employment use. The policy SP25 also sets out support for sustainable growth and expansion of rural businesses. The is further discussed in Matter 2 Question 14 and 15.</p>
	<p>11. Should the current economic growth predictions and uncertainty be taken into account in the economic strategy? What implications might there be for Hyndburn? Is the economic strategy sufficiently flexible to cope with slower than expected economic growth?</p>	<p>The HENA Update 2021 (HBC2.003b) does consider the impact of COVID-19 (and Brexit) and this can be clearly seen in table 8.2 with a contraction 2019 to 2021 and then a return to growth and equilibrium by 2023. Further economic disruption is now being experienced in 2022 due to the war in Ukraine and inflationary pressures which are expected to last into 2023. However, these are expected to be relatively short-term influences in the context of a plan looking ahead to 2037. Inevitably there will be years of slower and faster growth.</p> <p>The HENA seeks to take a balanced long-term view of economic growth potential, drawing on trends over the past decade (from 2011) and beyond. Table 8.8 (HBC2.003b) is helpful in this regard as we can see a jobs position set out over the full time period from 1992 to 2037 with the outcomes for the later forecast not unrealistic when considering the longer-term stronger growth trends in the past, including recession bounce back in 2012-14. It is therefore considered that the evidence is up to date and justified.</p>

Matter 4: The Economy and Town Centres

	<p>12. Where in the Plan does it set out the expectations for EMP1 and EMP2. What use classes would be acceptable on these sites? Should these two sites have a specific policy to outline the design, environmental and transport considerations?</p>	<p>The plan does not set out specific expectations for the types of use classes that would be acceptable on EMP1 and EMP2. The Council considers that proposals at these sites would be expected to accord to the identified need in the HENA (2021) (HBC2.003b), but these sites would provide flexibility to ensure delivery of appropriate employment opportunities.</p> <p>The Council do not consider that these two allocations need a specific site policy. The council believe that the policies set out in the Local plan and adopted Development Management plan provide a sufficient basis of ensuring appropriate development on both sites.</p>
	<p>13. The Employment Background Paper sets out that there is a need for around 2.41 ha of land for office uses, 19.88 ha for industrial uses and 47.76 ha of land for warehousing. To be effective, should the Policy set this out to prevent the disproportionate development of one type of employment use? Does there need to be greater clarity about the types and amounts of uses to be supported on the individual allocations?</p>	<p>Policy SP4 sets out the requirement for 70ha of employment land. The Council do not believe that the policy should be prescriptive in accounting for the types of need for individual sites, this is to ensure that there is flexibility for market delivery at these sites.</p> <p>The Council consider that Part 2 adequately reflects the Councils consideration of how it will monitor the development uses through the Annual Monitoring Report and where there are disproportionate levels of development of a single use the council will look to undertake a review of the policy.</p>
	<p>14. The strategic allocations EMP3, EMP4, EMP5 and EMP6 are identified as being suitable for B2 and B8 uses. Where is it anticipated that the required land for office uses will be provided? Should there be some flexibility to allow other employment uses on the strategic allocations which may provide high quality jobs?</p>	<p>The Council have identified these sites as being suitable for B2 and B8 use classes as these sites are larger sites capable of achieving the appropriate size and scale for modern B2 and B8 uses in the borough. Given the identified requirements in the HENA (2021) (HBC2.003b) for these types of uses (equating to nearly 96%) the Council consider this appropriate to ensure the appropriate mix of employment spaces.</p> <p>Furthermore, the Council have concerns around the Use classification of office space. As a Class E use Office development is categorised alongside many other use classes. This may potentially lead to changes in use that are not considered to align with employment uses on these sites.</p> <p>The Council believe that there is potential for office development at both sites EMP1 and EMP2 as well as through intensification or reuse of poor-quality employment sites within the borough. The Council considers that given the relatively small requirement for office space the identified strategies and policies are sound.</p>

<p>Policy SP4 Employment Provision and Strategic Sites</p>	<p>15. The Policy sets out that 70 ha of land for employment uses will be provided over the Plan period. In the interest of effectiveness, bearing in mind the gross site areas in Table 1, should the Policy state the gross and net figures?</p>	<p>Yes. The council propose the following main modification:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Site Ref.</th> <th style="text-align: center;">Prev. Site Ref.</th> <th style="text-align: center;">Site Name</th> <th style="text-align: center;">Local Plan area</th> <th style="text-align: center;">Gross Site Area (ha) – approx.</th> <th style="text-align: center;"><u>Net Developable Site Area (ha) - approx</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">EMP1</td> <td style="text-align: center;">250</td> <td>Land west of J7 Business Park</td> <td>Clayton-le-Moors and Altham</td> <td style="text-align: center;">4.4</td> <td style="text-align: center;"><u>4.4</u></td> </tr> <tr> <td style="text-align: center;">EMP2</td> <td style="text-align: center;">172</td> <td>Moorfield Industrial Estate</td> <td>Clayton-le-Moors and Altham</td> <td style="text-align: center;">1.7</td> <td style="text-align: center;"><u>1.7</u></td> </tr> <tr> <td style="text-align: center;">EMP3</td> <td style="text-align: center;">267</td> <td>Land to S. of Altham Business Park</td> <td>Clayton-le-Moors and Altham</td> <td style="text-align: center;">45.5</td> <td style="text-align: center;"><u>36.8</u></td> </tr> <tr> <td style="text-align: center;">EMP4</td> <td style="text-align: center;">228</td> <td>Land between Blackburn Rd and M65 slipway</td> <td>Rishton and Whitebirk</td> <td style="text-align: center;">4.0</td> <td style="text-align: center;"><u>2.28</u></td> </tr> <tr> <td style="text-align: center;">EMP5</td> <td style="text-align: center;">229</td> <td>Land between Blackburn Rd, Sidebeet Lane, Leeds & Liverpool Canal and railway</td> <td>Rishton and Whitebirk</td> <td style="text-align: center;">18.1</td> <td style="text-align: center;"><u>8.73</u></td> </tr> <tr> <td style="text-align: center;">EMP6</td> <td style="text-align: center;">230</td> <td>Land N. of railway line between Sidebeet Lane and Leeds & Liverpool Canal</td> <td>Rishton and Whitebirk</td> <td style="text-align: center;">20.7</td> <td style="text-align: center;"><u>18.56</u></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">TOTAL</td> <td></td> <td style="text-align: center;">94.4*</td> <td style="text-align: center;"><u>72.74</u></td> </tr> </tbody> </table>	Site Ref.	Prev. Site Ref.	Site Name	Local Plan area	Gross Site Area (ha) – approx.	<u>Net Developable Site Area (ha) - approx</u>	EMP1	250	Land west of J7 Business Park	Clayton-le-Moors and Altham	4.4	<u>4.4</u>	EMP2	172	Moorfield Industrial Estate	Clayton-le-Moors and Altham	1.7	<u>1.7</u>	EMP3	267	Land to S. of Altham Business Park	Clayton-le-Moors and Altham	45.5	<u>36.8</u>	EMP4	228	Land between Blackburn Rd and M65 slipway	Rishton and Whitebirk	4.0	<u>2.28</u>	EMP5	229	Land between Blackburn Rd, Sidebeet Lane, Leeds & Liverpool Canal and railway	Rishton and Whitebirk	18.1	<u>8.73</u>	EMP6	230	Land N. of railway line between Sidebeet Lane and Leeds & Liverpool Canal	Rishton and Whitebirk	20.7	<u>18.56</u>			TOTAL		94.4*	<u>72.74</u>
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	<p>16. Policy SP4 in part 2 states that the Council preference is to support a higher proportion of uses which generates</p>	<p>Yes, the Council consider this to be positively prepared. The Employment paper (HBC8.002) identified a requirement for both industrial and warehouse jobs. It is clear</p>																																																

Matter 4: The Economy and Town Centres

	<p>a greater number of jobs. In the event of a disproportionate number of B8 jobs coming forward, the Policy states that the Council will review its policy position. Is this section of the Policy positively prepared and is it effective? What steps does the Council intend to take to address this situation if it occurs?</p>	<p>from the viability assessment (HBC2.006) that warehousing uses are more viable than industrial uses and therefore careful consideration is needed to ensure that there is not an over provision of certain uses.</p> <p>The Council propose to monitor this through the Annual Monitoring Report. The Council would consider an overprovision of B8 uses to be met when delivery of development in this use class exceeds the relative required provision set out in the HENA (2021).Where an over provision of B8 uses are coming forward the council would consider whether this should trigger consideration of the review of the policy. If this was shown to be required, the Council would undertake a review of the Local Plan to consider future employment uses.</p>
	<p>17. Part 3 of the Policy refers to the East Lancashire Rail Freight Terminal and states that suitable access arrangements will need to be identified. Is this section of the policy effectively worded? What access arrangements could be possible and does this raise any consequential implications that the Plan should address?</p>	<p>The Council considers that Part 3 of Policy SP4 is effectively worded to safeguard the land for a potential future East Lancashire Rail Freight Terminal. The Council is aware that the government is considering proposals to extend the east Lancashire Railway Line between Colne and Skipton for both passenger and freight services. If the proposals for the development of a freight service along the East Lancashire Railway are supported, it is important that this supports local economic development along its route. The site of the former rail sidings at Huncoat is one of few locations along the route of the railway that could accommodate a rail freight terminal.</p> <p>The Council acknowledge that there is no certainty to any potential development here and therefore have proposed to safeguard the land for this purpose therefore the council do not consider that further implications need to be considered through this plan as it does not allocate the site for development.</p> <p>As identified in paragraph 4.15 and 4.17 more detailed feasibility studies would need to be undertaken to identify potential access arrangements for the site, and these would be considered in any future reviews of the Local Plan.</p>
<p>Policy SP5 Protection, Modernization and Development of Employment sites</p>	<p>18. Part 2 of the Policy identifies the strategic employment hubs illustrated in the Key Diagram and states that they will be supported to grow in line with Policy SP4. Is it clear to developers, decision makers and the community how this will be achieved?</p>	<p>Yes, Part 2 of Policy SP5 identifies the strategic employment hubs illustrated in the key diagrams. Policy SP4 provides the framework for how these key strategic employment sites will grow and provides clear direction on how to achieve development on these sites.</p>

Matter 4: The Economy and Town Centres

	<p>19. Part 3b of the Policy concerns adequate quality employment sites. Is there contradiction and/or duplication between the requirements of paragraphs 2-4 of Policy DM1 and sub sections i-iii of this part of the Policy? Is the Policy effectively worded?</p>	<p>The Council does not consider that Policy SP5 is contradictory or duplicates Policy DM1 of the Development Management Plan. Policy SP5 states in paragraph b that subsection i-iii relates to developments that already comply with the requirements set out in Policy DM1 paragraphs 2-4. Therefore, proposals will be expected to comply with all requirements set out in both policies. Therefore, we would see Policy SP5 as complimentary to DM1 and building on the requirements set out in that policy and therefore effectively worded.</p>
	<p>20. Part 4 of the policy states that proposals for the redevelopment of existing employment sites away from a B use class to one that retains some form of significant employment on the site will be considered more flexibly? What does 'flexibly' mean in this context. Would the policy wording be more effective if the word favourably was substituted as referenced in the supporting text?</p>	<p>The Council agrees that the policy wording would be more effective if the word 'flexibly' was replaced with 'favourably'. The Council proposes the following main modification to Policy SP5 part 4:</p> <p><i>4) Proposals for the redevelopment of existing employment sites away from a B use class to one that retains some form of significant employment on the site will be considered more flexibly favourably than proposals for residential use. The development of retail uses on employment sites will not be supported.</i></p>
	<p>21. In the Schedule of proposed minor modifications (HBC1.006) it is proposed to remove the last sentence of part 4 of the policy, 'The development of retail uses on employment sites will not be supported'. Is this justified?</p>	<p>The Council considers that the removal of the last sentence of part 4 of Policy SP5 is justified to ensure that the policy wording is not contradictory.</p> <p>The Council does not want to be unduly inflexible on types of uses and there are no indications that retail uses should be disqualified at the expense of other forms of significant employment.</p>
	<p>22. Is reference to the Framework (Agent of Change principle) necessary for effectiveness in part 6 of the Policy?</p>	<p>The Council recognises that this is a duplication of the NPPF and therefore is not necessary for the effectiveness of Part 6 of Policy SP5. The Council proposes the following main modification to Policy SP5 part 6:</p> <p><i>6) In all cases, redevelopment for alternative uses should not prejudice the operating conditions of other remaining employment uses, in line with the Agent of Change principle set out in NPPF.</i></p>
<p>Policy SP6 Centre Hierarchy, Strategy and Retail Provision</p>	<p>23. Are the town and local centre boundaries shown on the Policies Map justified? Have they been reviewed?</p>	<p>The town and local centre boundaries shown on the Policies Map are consistent with those included in the Policies Map that accompanied the DM DPD, adopted in January 2018.</p>

Matter 4: The Economy and Town Centres

		<p>The Council confirms that these boundaries have not been reviewed but maintains that they still accurately delineate areas with a high concentration of main town centre uses, in line with the definition of "Town Centre" provided in Annex 2 of the NPPF.</p>
	<p>24. Should the Policy give greater recognition of the leisure and commercial uses at Hyndburn Retail Park and the potential role the site in adding to the commercial attractiveness of the planned employment allocations?</p>	<p>See response to Matter 2, Issue 2.2, Question 6.</p> <p>It is considered that adequate recognition has been given to the leisure and commercial uses at Hyndburn Retail Park, which will primarily function as an out-of-centre bulky goods retail destination. The policy acknowledges that the site will also feature a variety of non-bulky goods retail, which will complement and support the strategic employment hub at Whitebirk, enhancing its commercial appeal. Nevertheless, it remains crucial to ensure that the vitality and viability of well-established and highly sustainable town centres, which are central to local communities, are not negatively affected.</p>
	<p>25. In terms of the retail hierarchy is their justification for identifying Hyndburn Retail Park as a 'centre'?</p>	<p>The Council considers that Hyndburn Retail Park should not be designated as a 'centre' for the following reasons.</p> <p>The NPPF defines town centres as areas where there is a concentration of main town centre uses (retail, leisure, office, and cultural facilities), which serve as hubs for the local community. This includes town centres, and district and local centres, all of which provide a diverse range of services and functions.</p> <p>An out-of-centre retail park, by definition, does not meet this broader functional role. While it may offer retail opportunities, typically focused on larger units or specific retail categories (such as bulky goods or discount stores), it does not provide the diversity of services or community infrastructure that a town centre offers, such as health services, public transport links, public spaces, or a mix of smaller-scale shops and services.</p> <p>One of the key principles of national planning policy is promoting sustainable development, particularly in relation to reducing car dependency and encouraging the use of public transport. Town centres, as outlined in the NPPF, are expected to be accessible to a range of people, including those who rely on walking, cycling, or public transport.</p> <p>Town centres are typically located in areas with good transport links, higher-density housing, and proximity to a variety of services. In contrast, retail parks located in edge-of-</p>

Matter 4: The Economy and Town Centres

centre locations often lack the accessibility by sustainable transport methods that characterise town centres. They are often designed to be accessed by car, which is contrary to aim of reducing reliance on private vehicles.

The [HBC3.002a](#) Retail Study (2016) identifies only modest retail needs in the Borough, which could be met by existing town centres. This study highlights that there is no pressing demand for new retail locations that would require the designation of an out-of-centre site as a town centre. According to the study, the retail demand in the area can be absorbed within the existing town centres, which are more sustainable and better equipped to serve the needs of the local population.