HYNDBURN BOROUGH COUNCIL

CORE STRATEGY

HEARING SESSION: AREA BASED POLICIES
ACCRINGTON AND TOWNSHIPS

HUNCOAT

STATEMENT ON BEHALF
OF
DALE PROPERTY SERVICES LTD

RESPONDENT I.D. NO: CS034

OUR REF: 07/2619/REPS

AUGUST 2011
CONTENTS

1. INTRODUCTION

2. BACKGROUND HISTORY

3. CORE STRATEGY – SUBMISSION DOCUMENTS

4. SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION – No. 7 Area Based Policies - Huncoat

5. CONCLUSIONS

APPENDICES

A. Plan showing extent of Dale Property Service’s land ownership.

B. Plan showing Option 1, proposed vehicular access from WHLR.

C. Letter from Mr P Whitehead, Regional Regeneration Director of Countryside Properties dated 12 August, 2011.


1. INTRODUCTION

1.1 A Hearing Session to consider the policies and issues relating to the proposed housing and employment sites at Huncoat is to be held on 27 September, 2011. I represent Dale Property Services, the major landholder of the land identified for housing at the former Huncoat Colliery site, who is in support of the Balanced Strategy and the associated policies and proposals contained in the Core Strategy particularly in respect of Huncoat.

1.2 Since my last representations, submitted on 20 December, 2010, on the Revised Public Edition of the Core Strategy there have been further changes by Hyndburn Borough Council and, in addition, the Government (DCLG) has issued a consultation draft of the National Planning Policy Framework (NPPF). My comments will, therefore, be confined to those policy changes and the issues raised by the Inspector for discussion at the Hearing Session on Huncoat as well as background history relating to the negotiations with LCC for a new vehicular access to the land from the WHLR.

2. BACKGROUND HISTORY

2.1 The Graham Bolton Planning Partnership Ltd has acted on behalf of Dale Property Services Ltd in respect of their land at the former Huncoat Colliery, Altham Lane, Huncoat since 2007. A plan showing the extent of their land ownership is appended at A.

2.2 In response to a “Call for Sites” exercise for the Strategic Housing Land Availability Assessment (SHLAA) and the Site Allocations Development Plan document, the former Huncoat Colliery land was put forward as a potential housing site. Representations in support of the land for housing purposes have been put forward at key stages of the emerging Core Strategy.
2.3 Concurrently, representations were made in respect of planning application ref. No. 11/08/0482 which was submitted by Lancashire County Council for the construction of the Whinney Hill Link Road (WHLR) which would cross the northern part of my client’s land, south of the M65. There was no objection in principle to the proposed road but it was pointed out, in a letter dated 15 October, 2008, to Hyndburn Borough Council that the only vehicular access to my client’s land, which is from Altham Lane, would be removed due to the configuration of the proposed road. Furthermore, my client wished to maintain vehicular access to his remaining land, but no such provision was shown on the submitted plans for the WHLR. Although my client thought this must be an oversight by Lancashire County Council, no amended plans showing a suitable access were received by Hyndburn Borough Council. Objections on the same grounds were then made to the Secretary of State for Transport in respect of the Lancashire County Council (Whinney Hill Link Road) Compulsory Purchase Order 2008 and it was argued that the removal of the existing vehicular access road would sterilise their land and a field gate would be inadequate when the existing access is approximately 14.5m wide. A new vehicular access was sought.

2.4 Negotiations to remove my client’s objection commenced with Lancashire County Council and it was withdrawn on 16 December, 2009, following receipt of two options for vehicular access into the former Huncoat Colliery land from a section of the road to the east of Clough Brook as shown on the appended plan at B. Option 1 was preferred as it would access and join the adopted public highway at the same point without too much land uptake and provision would be made for a 7.3m wide access. It was agreed that the final design of the access into my client’s land would be subject to further detailed discussion at the design stage.

3. CORE STRATEGY – SUBMISSION DOCUMENTS

3.1 Schedule of Proposed Changes, May 2011

No comments.

Page 4 of 9
3.2 Schedule of Further Proposed Changes, July 2011

- Page 76, para. 5.39 – there is no objection to the insertion and it is accepted that the matter of contributions will be addressed in more detail in the Site Allocations and Development Management DPDs.
- Page 77, new para. after para. 5.45 – at a meeting held on 10 August, 2011, with Council Officers it was agreed that the site was sufficiently large for a number of house builders to develop it and this would generate a contribution towards Phase 1 of WHLR.
- Page 135, Appendix 9, Partners in Delivery, Phasing and Targets - Dale Property Services is the major landholder of the housing site together with Lancashire County Council who own the land between the southern boundary of my client’s land up to Enfield Close. Another landowner owns the smaller strip of land facing Altham Lane, parallel to the railway line. My client has consistently stated that his land could be brought forward for development within the next five years and he would welcome this.

3.3 Draft Balanced Development Strategy (BDS policy)

No objections – Support.

3.4 Green Belt Topic Paper, April 2011 and Huncoat Topic Paper, June 2011

- It is considered that the Council have justified the removal of the former Huncoat Colliery land from the Green Belt and the development of the land for housing in accordance with the Strategic Objectives of the Core Strategy and the consultation draft of the National Planning Policy Framework which has a presumption in favour of sustainable development.
4. SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION – No. 7 Area Based Policies - Accrington and Townships

e. Huncoat (Policies A7-A9)

i. What is the basis and justification for the major housing proposal at Huncoat, and what is the likely scale and timescale of development?

The land owned by Dale Property Services is unused and therefore has no time constraint on its availability for development. Work could, therefore, commence on the Brief, site investigations and remedial work, planning application etc, as soon as the Core Strategy is adopted by the Council.

ii. What are the implications of redeveloping the former Colliery site for housing in terms of practicality and deliverability, and are there are adverse implications relating to the presence of the nearby RSPCA Animal Centre and proposed employment/waste management development?

The draft National Planning Policy Framework (NPPF) defines deliverability:

“To be considered deliverable, sites should at the point of adoption of the Local Plan, be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable ie. that it would provide acceptable returns to a willing landowner and a willing developer based on current values and taking account of all likely infrastructure, standards and other costs”.

The various requirements are considered separately as follows:

- Availability – a large part of the site, as stated, is available now. There is no reason to suggest that Lancashire County Council and the owner of the strip of land fronting
Altham Lane would be adverse to the development of their land for housing purposes.

- **Suitable location** – the land identified for housing can be accessed from Enfield Road and Altham Lane. In addition, there is the potential for vehicular access from the WHLR or an alternative road layout. Therefore, the land is accessible and is not dependent on Phase 2 of the WHLR being developed at the same time.

- **Achievable** – the potential of the former Huncoat Colliery as land for housing has engendered keen interest from national housebuilders because it is viewed as being in a desirable location in terms of accessibility to local facilities, the town centre, public transport and the road network. This is confirmed in the letter appended at C from Mr P Whitehead, Regional Regeneration Director of Countryside Properties who has attended a number of meetings with the Council about the site and is, therefore, familiar with Huncoat and the former colliery land.

- **Viable delivery of the site** – delivery of the site for housing within five years, which could be even more important as the Government is seeking to introduce an additional allowance of at least 20% of deliverable sites above the five year supply to ensure choice and competition (para. 109) – depends on the co-operation of a number of parties, inter alia, the landowners, the Council, statutory bodies and the housebuilders. However, the site needs to be viable and the SHLAA identifies some constraints to development which were partly addressed in my representation to the Revised Publication Edition of the Core Strategy which is appended at D. Concern was expressed about the poor rating of the site which I considered was not wholly accurate notwithstanding that there was potentially a need for remedial measures. At the meeting held with the officers on 10 August, 2011, it was agreed that the SHLAA rating was unjustifiably low and that this would be addressed when it was revised. It was also agreed that it would be helpful for the Council to produce a constraints map of the site which would assist in showing, for example, that the site contains a relatively small coal board referral area.
In addition, I expect the designation as lying within Flood Zone 3 would relate only to the part of the site around the Clough Brook Valley. As house builders have built up considerable expertise in developing brownfield sites it is expected that such potential issues could be satisfactorily addressed and this was the view expressed by Mr P Whitehead at the meeting.

The cost of remedial works, contributions to Phase 1 of the WHLR and any other requirements of the Development Brief will need to be balanced against an acceptable return for the landowner and developer as the draft NPPF comments. However, the interest which has been generated from housebuilders, who have been informed about the site’s coal mining history and the potential requirements of the Development Brief, in developing the site at Huncoat demonstrates that it is an attractive site for housing development which is viable and achievable.

vi. What are the exceptional circumstances justifying the removal of land from the Green Belt and its impact on the purposes of the Green Belt?

The exceptional circumstances justifying the removal of the former Huncoat Colliery land from the Green Belt and the impact on its purposes have been addressed in my representations dated 27th September, 2010, in respect of the Core Strategy Publication Edition; the relevant comments are appended at E.

5. CONCLUSION

5.1 It is evident from the draft NPPF that local planning authorities are being encouraged to take a pro-active approach to sustainable development, to approach development management decisions positively looking for solutions rather than problems and, importantly, to “attach significant weight to the benefit of economic and housing growth”. Hyndburn Borough Council has embraced localism by listening to local communities such as Huncoat and developing a Core strategy which meets their needs and aspirations which will benefit Hyndburn as a whole.
5.2 The emphasis in the Core Strategy on Huncoat as a suitable area for housing and economic growth accords with the Government’s purpose for the planning system which is the achievement of sustainable development. In setting out the three components of sustainable development in the draft NPPF, this would be achieved firstly by planning for prosperity with the designation of the strategic employment site in an area which would be accessible and can grow.

5.3 Secondly, planning for people would be achieved by the development of housing on the former Colliery site where “a wide choice of high quality homes that people want and need” can be delivered (para. 107).

5.4 Lastly, planning for places has resulted in the local community successfully defending and protecting their amenity space within the village with the support of the Council. Therefore, it is considered that Hyndburn’s Core Strategy is sound in that it has been “positively prepared” and is based on a strategy which seeks to meet the strategic objectives of their overall vision for the Borough.
Appendix A
Our Ref: PW / JC

12 August 2011

Mrs S Bolton
The Graham Bolton Partnership Limited
Onward Buildings
207 Deansgate
Manchester
M3 3NW

By email and Post: seb@gbpp-planning.co.uk

Dear Mrs Bolton

Re: Land at the Former Huncoat Colliery, Altham Lane, Accrington

With reference to the above and more particularly our meeting with representatives of Hyndburn’s Planning Department in the Council’s offices on the 10th August 2011 I reiterate my response to certain of the issues raised and addressed during the course of our discussions.

I perceive that the former Huncoat Colliery provides a very viable opportunity for the delivery of a range of family housing to meet the requirements of evident local need and demand. Its physical location is such that it is served by a range of transport infrastructure in the form of both rail and the existing road network. Future provision of the proposed Whinney Hill link road will only serve to enhance this further.

A significant proportion of the existing housing stock within both the local land greater Accrington area is pre 1920 terraced housing. Consequently the supply of a range of, mainly three bedroom, properties will appeal to a public demand which is not currently being addressed.

There remains on the Huncoat Colliery site significant evidence of its previous usage, which would be remediated through the development process to provide a more beneficial environment for both the existing community and future residents.

I trust the foregoing adequately summarises the subject of our discussions.

Yours sincerely

Philip Whitehead
Regional Regeneration Director
Appendix D
Dear Sir,

Revised Publication Edition of the Core Strategy (Consultation until 20 December, 2010)
Representations on behalf of Dale Services Limited, owner of the former Huncoat Colliery, Altham Lane, Huncoat, Accrington site

I refer to the above revisions to the Core Strategy and write in support of the introduction of Policy A7, Housing in Huncoat which states:

"Land to the north of the Preston / Colne railway line of Station Road in Huncoat will be developed for housing".

Huncoat has been identified in the Balanced Development Strategy as an area where priority will be given to attracting new housing and employment (para. 3.19). The former colliery site would contribute to providing high quality housing in a sustainable location and is, therefore, identified as a new housing site in the Key Diagram and this is supported by my client. Previous comments about the new housing site, ref CS 034/04 and 05 made in respect of the Core Strategy Publication Edition are also relevant and support Policy A7; they are attached to this letter.

It is proposed in the Core Strategy that a Development Brief should be prepared for the land and this would continue the discussions which have already taken place with Council Officers and local Councillors about the deliverability of the site. The former colliery land (ref: Site ID 241) which includes Clough Brook and is a Site of Natural/Biological Importance (SLNBI) in a wooded ravine, was put forward on behalf of the owner as a potential housing site and the SHLAA has also provided evidence on the suitability of sites for housing development.

For the SHLAA, each site was surveyed and an assessment made of the suitability, availability and achievability of their being delivered for housing. The former Huncoat Colliery scored 45 points out of a maximum of 86 points and therefore fell within the scoring category which represents sites with "the largest number or most severe constraints to development".
The score for my client’s land does not represent the whole of the housing site shown diagrammatically on the key diagram and also includes the Clough Brook watercourse, ravine and woodland which would not be developed but would be enhanced through a scheme of proposals to be agreed in the Development Brief and, therefore, weights the scoring of the potential of the site for housing more lowly than should realistically be the case. It is, therefore a worthwhile exercise to briefly reconsider the 17 assessment criteria to see if the scoring for the former colliery land, now included under Policy A7 was too low.

Firstly, as the land lies in the green belt, it has a policy constraint which needs to be overcome. The Council has identified the very special circumstances for making changes to the green belt boundary in this area as the need for additional land for high quality housing in a sustainable location. However, the rationale explains that development should, where possible, be on brownfield sites. Although the buildings have been removed and the land has become overgrown, some hardstanding from the colliery remains.

In respect of the Assessment Criterion, Access/Infrastructure, the assessment concludes that the former colliery site has good access to the railway station and bus services and that the site access is “constrained to a reasonable cost”. There is an existing small site access from Altham Lane which could easily be widened and in the event that the Whinney Hill Link Road (WHLR) is built, vehicular access could, potentially, be provided from the new road. The proposed housing site would extend in a south westerly direction, beyond my client’s land ownership, to Enfield Road which would also provide further site access. Therefore, there is no significant constraint to providing vehicular access to the land.

Under Environmental Issues, the assessment of the former colliery land identifies it as lying within Flood Risk Zones 2 and 3. The only watercourse on the land is Clough Brook which is in Flood Risk Zone 3. The remainder of the former colliery land is gently sloping in an east-west direction rising from Clough Brook towards the Preston-Burnley railway line. Although no Flood Risk Assessment has been undertaken, the development of the land for housing would increase surface water run-off but this can be addressed by a Sustainable Urban Drainage System (SUDS) to ensure there is no increase in flood risk as a consequence of the development. Other mitigation measures could be incorporated into the design of the SUDS including storage ponds if necessary and, therefore, this is an issue which can be addressed and is not a barrier to development.

There is a potential for contamination on the site due to its former use as a colliery. Many previously developed sites have contamination issues and it will be necessary to carry out a ground investigation and a quantitative risk assessment to confirm the nature and extent of contamination. If significant contamination exists, a remediation strategy will be prepared. Although this increases the development costs, it is not unusual for brownfield sites to have such problems and therefore it is not regarded as an insurmountable constraint to development.
Planning Services
Hyndburn Borough Council

Revised Publication Edition of the Core Strategy (Consultation until 20 December, 2010)

Representations on behalf of Dale Services Limited, owner of the former Huncoat Colliery, Altham Lane, Huncoat, Accrington site

Of the other assessment criteria falling within Environmental Issues, the site received a low score because the land is crossed by a wildlife corridor/link as shown on the Hyndburn Local Plan Proposals Map 1996. However, the Development Brief would seek to ensure that “there will be no net loss of biodiversity resource, compensating for any habitat loss that may arise through enhancing habitat areas to be retained on other parts of the site and linkages to adjacent natural environment resources.” Lastly, it is noted that the site is unconstrained by utility installations and is not within a hazardous installation zone which results in a higher score.

The Assessment Criteria then consider a number of single issues which include site location and whether the site falls within settlement boundaries; it is noted that it has one or more boundaries with the built area which makes it contiguous with the urban area. Land use type is described as greenfield, presumably because the land is overgrown, but this ignores the presence of the hardstanding which could allow it to have been described as a mix of previously developed land/greenfield which would have resulted in a slightly higher score. In respect of proximity to employment sites, the land scores highly.

Although it is noted that the land is in single ownership it was wrongly categorised as “intentions unknown” and a higher score would have been achieved if it had been categorised under “developer/intentions known” since the site was put forward on behalf of the owner for development. It was also assessed as falling within long term availability (11-15 years) whereas the Council consider that a more realistic period would be the medium term (6-10 years). The owner of the land would wish to see it come forward into the short term (0-5 years) category because his land is available for development and the Development Brief could be prepared and the investigative works initiated.

In assessing whether the development of the site is achievable, a judgment was made based on the analysis of local market conditions to gauge the overall strength of the market in key settlements of Hyndburn. Although the site was assessed as falling within the lowest category of a weak housing market area it could, conversely, have been placed in the “strong housing market area” category as the land would satisfy the criteria of being in an attractive location, attracting interest from housebuilders and having market demand particularly due to its sustainable location in respect of access to public transport and local services such as schools, shops etc.

Although there are issues of potential contamination from its former use as a colliery site and surface water run-off as referred to in the Core Strategy, they are not insurmountable problems and can be addressed through remedial or mitigation measures.
Planning Services

Hyndburn Borough Council

Revised Publication Edition of the Core Strategy (Consultation until 20 December, 2010)

Representations on behalf of Dale Services Limited, owner of the former Huncoat Colliery, Altham Lane, Huncoat, Accrington site

In addition, development of the land offers opportunities to provide community benefits/facilities for Huncoat village as well as the enhancement of the ecology and biodiversity of the site.

The introduction of Policy A7 is supported.

Yours faithfully

Susan Bolton
**Core Strategy Publication Edition**
**Accrington Area Action Plan Publication Edition**

Please use a separate sheet for each comment / representation you wish to make. Comments made need to relate to the tests of soundness - that is be justified, effective and consistent with National Policy. For further information on the tests of soundness, please visit [www.planning-inspectorate.gov.uk](http://www.planning-inspectorate.gov.uk). The Core Strategy, the Accrington Area Action Plan together with supporting documents including the Sustainability Appraisals are available online at: [www.hyundburnbc.gov.uk](http://www.hyundburnbc.gov.uk). Comments must be received by 4pm on Monday 27th September 2010.

## Contact Details

1. **Your Details**
   - **Name:**
   - **Organisation:** DALE PROPERTY SERVICES LTD
   - **Address:** STAND LEES FARM, ASHWORTH ROAD, NORDEN, ROCHDALE
   - **Postcode:** OL11 5UN
   - **Telephone:**
   - **Email:**

2. **Your Agent (if applicable)**
   - **Name:** SUSAN BOLTON
   - **Organisation:** THE GRAHAM BOLTON PLANNING PARTNERSHIP LTD
   - **Address:** ONWARD BUILDINGS, 207 DEANSGATE, MANCHESTER
   - **Postcode:** M3 3NW
   - **Telephone:** 0161 833 1616
   - **Email:** seb@gbpp-planning.co.uk

## Your Comments

3. **To which document do your comments relate to:**
   - Core Strategy
   - Accrington AAP

4. **To which part of the Core Strategy/Accrington AAP do your representation relate?**
   - Paragraph/Figure No: 5.36 - 5.40
   - Policy No:

5. **Did you raise the matter to which your comments relate to earlier in the process of preparation of the Core Strategy/Accrington AAP?**
   - **No**
   - **Yes**
   - If No, can you briefly explain the reason why you did not do so?

6. **Do you consider the Core Strategy/Accrington AAP to be sound?**
   - **Yes**
   - **No**

7. **If you consider either document to be unsound, please select the reason for this:**
8. Please explain the reasons for your choice and what changes you consider are necessary to make the document sound. Please be as precise as possible.

The Balanced Development Strategy for Hyndburn is supported and the following statement reinforces the Council’s decision to remove the former Colliery site at Huncoat from the green belt and to designate it as a Housing Site.

HUNCOAT

The identification of the former colliery land in Huncoat as a major site for housing is supported. Other comments made elsewhere about the Core Strategy in relation to the proposed balanced strategy, green belt, housing and employment policies are also relevant.

The former Huncoat colliery site comprises 14.86 hectares of mainly overgrown grassland interspersed with hardstanding and remnants of the former colliery buildings. The land generally slopes from Altham Lane in a northerly direction towards the M65 which is in a cutting at this point and westwards to Clough Brook which flows through a steeply wooded ravine. The site would be suitable for a high quality housing development in a landscape setting subject to the requirements of a development brief. Prior to development, there would be a need to address issues of potential contamination from the previous use and also surface run-off which do not impose any insurmountable constraint to development.

The proposal identifying the former colliery land in Huncoat as a site for high quality housing to meet the Borough’s housing needs is supported for the following reasons:

(i) The Core Strategy identifies the need for a more balanced housing supply with a greater provision of larger family and high quality housing. Huncoat is identified as a suitable location for this type of housing as it is in a highly accessible location having good connections to the primary road and motorway network, good rail and bus links, good facilities and services and existing and new jobs through the establishment of the proposed strategic employment site for a waste technology park and other employment uses.

(ii) The identification of sites for housing requires a sequential test with sites in the urban area being preferable to greenfield land or green belt land outside the built up area. There are no other sites of a similar size in Accrington which for the purposes of the Core Strategy includes Huncoat but excludes Rishton and Great Harwood which have their own housing target of 10% and 15% respectively for the distribution of new housing which reflects their function and regeneration opportunities. The only open land in Huncoat village of a similar size to the former colliery land is an area of open land which includes football pitches and woodland bounded by Bolton Avenue, Bluebell Way, Lynwood Road and Winterley Drive. During community consultations, local residents have been strongly opposed to the possibility that this land could be developed for housing and have generated a 3,000 signature petition in support of its designation as open space which is now identified in the Balanced Development Strategy. Therefore, there is no other site in Huncoat or within the urban boundary to accommodate the required mix of high quality housing and to satisfy the provision of land for 3,400 dwellings during the plan period. The identification of the former colliery land as a housing site has received the support of local Councillors and residents and this “localism” has enabled them to have a say about where new housing should be located in their community.

(iii) The former colliery site is considered appropriate for the development of housing for the following reasons:

- It is previously developed land and its development would enable the recycling of derelict land.
- It is in a sustainable location close to bus routes along Station Road, to Huncoat Railway Station, local facilities and schools.
- It is within easy reach of walking and cycling routes i.e. the Huncoat Greenway which links Huncoat to schools in the Milnshaw ward of Accrington.
- It is accessible to the strategic road network and the proposed Whinney Hill Link Road.
- It has an existing site access from Altham Lane with the potential of additional vehicular accesses from Enfield Lane and the Whinney Hill Link Road.
- It is adjacent to existing sources of employment and the proposed Waste Technology Park and business uses.
- Local residents would benefit, through the development brief, from the provision of additional facilities such as a community centre.
- Opportunities to increase biodiversity through a landscape scheme and the enhancement of Clough Brook.

The development of the former colliery land would have significant benefits for the borough by assisting in reducing outward migration and attracting new families to live in Hyndburn by providing good quality homes in a sustainable location and to Huncoat village as a means of reclaiming previously developed land, improving local facilities and amenity, and safeguarding existing open space and recreational facilities within the village.
9. Can your comments be considered by written representations or do you consider it necessary to attend the oral part of the examination?

Written Representations  
Oral Examination  YES

If you wish to participate at the oral part of the examination, please state why you consider this to be necessary:

The proposed housing site at the former colliery land at Huncoat is a major development and its removal from the green belt requires justification.

10. Do you wish to be notified:

when the Core Strategy/Accrington Area Action Plan is submitted to Secretary of State for independent examination?  YES
when the Core Strategy/Accrington Area Action Plan is adopted?

Signature  SUSAN BOLTON (FOR GBPP LTD)  Date:  27 SEPTEMBER, 2010

Please return this form to: Hyndburn Borough Council, Planning Services, Scaitcliffe House, Ormerod Street, Accrington, BB5 0PF, or planning@hyndburnbc.gov.uk or by fax to 01254 391625
HYNDBURN
The place to be
an excellent council - as rated by the audit commission

Comments Form

Core Strategy Publication Edition
Accrington Area Action Plan Publication Edition

Please use a separate sheet for each comment / representation you wish to make. Comments made need to relate to the tests of soundness - that is be justified, effective and consistent with National Policy. For further information on the tests of soundness, please visit www.planning-inspectorate.gov.uk. The Core Strategy, the Accrington Area Action Plan together with supporting documents including the Sustainability Appraisals are available online at: www.hyndburnbc.gov.uk.
Comments must be received by 4pm on Monday 27th September 2010.

Contact Details

1. Your Details
   Name:
   Organisation: DALE PROPERTY SERVICES LTD
   Address: STAND LEES FARM, ASHWORTH ROAD, NORDEN, ROCHDALE
   Postcode: OL11 5UN
   Telephone:
   Email

2. Your Agent (if applicable)
   Name:
   Organisation: THE GRAHAM BOLTON PLANNING PARTNERSHIP LTD
   Address: ONWARD BUILDINGS, 207 DEANSGATE, MANCHESTER
   Postcode: M3 3NW
   Telephone: 0161 833 1616
   Email: seb@gbpp-planning.co.uk

Your Comments

3. To which document do your comments relate to:
   Core Strategy   YES   Accrington AAP

4. To which part of the Core Strategy/Accrington AAP do your representation relate?
   Paragraph/Figure No: 3.19
   Policy No:

5. Did you raise the matter to which your comments relate to earlier in the process of preparation of the Core Strategy/Accrington AAP?
   No   Yes
   If No, can you briefly explain the reason why you did not do so?

6. Do you consider the Core Strategy/Accrington AAP to be sound?
   Yes   YES   No

7. If you consider either document to be unsound, please select the reason for this:
   Justified     Effective     Consistent with National
8. Please explain the reasons for your choice and what changes you consider are necessary to make the document sound. Please be as precise as possible.

The Balanced Development Strategy for Hyndburn is supported and the following statement reinforces the Council's decision to remove the former Colliery site at Huncoat from the green belt and to designate it as a Housing Site.

Para 3.19 The priority of attracting new development into "the less densely developed and highly accessible settlement at Huncoat" and the proposal to accommodate part of the Borough's employment land needs on greenfield land at Huncoat is supported. The identification of the former colliery site at Huncoat, at present in the green belt, "which would be developed for high quality housing to help meet the Borough's housing needs" is also supported although this would require the removal of the land from the Green Belt. In proposing high quality housing to meet the Borough's housing needs on the former colliery site, the Council has recognized that the land no longer fulfills any of the five purposes of including land in the green belt as set out in PPG2, Green Belts. This together with the need to improve the quality and price of housing would constitute the very special circumstances necessary to justify the removal of this land from the green belt.

The following assessment supports the council's conclusion that the site does not fulfill any of the purposes of including land within the green belt.

- To check the unrestricted sprawl of large built-up areas;

Land designated as green belt should be kept permanently open to prevent urban sprawl. However, the former Huncoat Colliery is previously developed land, though the buildings and the spoil tips have been removed, and had been developed for over 50 years, and had with a colliery rail link to the former Huncoat Power Station.

The Core Strategy acknowledges that the green belt boundary has been tightly drawn around the urban areas of Hyndburn giving little opportunity for new development at the fringe. Consequently, 54% of its total land area in 2009 was designated as green belt. For a small authority this represents a large proportion of its land in comparison, for example, to the neighbouring authority of Burnley which has only 9.5% of its land designated as green belt. Therefore the development opportunities for the borough have been more limited than was the case for some of its larger neighbours.

The Hyndburn Borough Local Plan was adopted in 1996 and it was intended that the green belt boundary would not need reviewing until 2011. In seeking to alter the green belt boundary around part of Huncoat, and the identification of land for a strategic employment site and a major housing site, now the Council is acknowledging the need to develop beyond the tightly drawn boundaries of the green belt which has existed since its general extent in Lancashire was defined in the late 1970s, almost 40 years ago. Moreover, the site is bound to the north by the M65 and the proposed route of the Whinney Hill Link Road, to the east by Altham Lane and to the south by Clough Brook, a Site of Local Natural and Biological Importance (SLNB), which together would form a defensible boundary to the green belt which would prevent further development beyond the former colliery boundaries. The release of this land would not, therefore, lead to unrestricted urban sprawl.

- To prevent neighbouring towns from merging into one another;

The Hyndburn Borough Local Plan describes the main purposes of the green belt:

"The green belt in Hyndburn Borough performs the important strategic function in separating the large adjoining towns of Blackburn and Burnley. At the local level, it performs an important role in separating the townships of Clayton-le-Moors / Church, Rishon and Great Harwood".

The former Huncoat Colliery site is approximately 1.5km from the small settlement of Hapton which lies to the east with the outer fringe of Burnley, 3.5km distant. To the north, the village of Altham is approximately 1.75km distant and the Whinney Hill landfill and quarry, which lie in the green belt, mark the edge of the built up area of Accrington, some 1.75km to the west. These distances are substantially greater than the stretches of designated green belt between the small townships referred to above. Moreover, both Hapton and thus Burnley, and Altham have the physical boundary of the A56 (T) and M65, respectively, between them and the former colliery land so the removal of the colliery land from the green belt would not lead to the neighbouring settlements merging.

- To assist in safeguarding the countryside from encroachment;

The rolling back of the green belt boundary to establish a major housing site on the former colliery land would have the added benefit of using previously developed land and therefore its development would be less sensitive than would be the case of another site in the green belt which is greenfield land or has a high quality of landscape.

The former colliery site is open land but it still reflects its industrial past despite some reclamation. The land, on which the buildings and spoil tips once stood, is now a man-made landscape which has grassed over. The proximity of Huncoat to other more attractive areas of countryside and the campaign of local residents to retain an existing area of open space in the village means that the value of the former colliery land as countryside remains limited as it provides little amenity value, special landscape or nature conservation.

- Preserve the setting of special character of historic towns;

The land has not been included within the Green Belt to preserve the setting or special character of a historic town.
- Assist in urban regeneration by encouraging recycling of derelict and other urban land;

The designation of the green belt has assisted the urban regeneration of Accrington. Its tightly drawn boundaries has resulted in new housing being developed within the urban boundary enabling the Council to easily meet its target for housing development on previously developed land of 90% of houses in 2007/8 and 97% in 2008/9. The Core Strategy will continue to ensure that the "majority of new housing will be developed on previously developed land within the existing urban area". However, the development of the former colliery land for housing would result in its own regeneration by removing any contamination or pollution from its previous use. Therefore, the proposed housing would enable the successful regeneration of previously developed land which could also lead to the enhancement of Clough Brook, a Site of Local Natural / Biological Importance.

It is concluded that the purposes of including the former colliery land within the green belt are no longer being fulfilled as required by PPG2. The Balanced Development Strategy has identified a need to "attract new development into the less densely developed and highly accessible settlement at Huncoat" and the "land on the former colliery site would be developed for high quality housing to help meet the Borough’s housing needs". Moreover as a large site its redevelopment would enable other objectives for green belt land in PPG2 to be met such as the enhancement of landscapes near to where people live, the improvement of damaged and derelict land around towns and the securing of nature conservation interests which could not be achieved without further investment in the former colliery land which housing development would bring.

Para 2.10 of PPG2, Green Belt, advises local planning authorities to take account of the need to promote sustainable patterns of development in drawing green belt boundaries which this site would satisfy. Moreover, other exceptional circumstances need to exist in order to necessitate a revision to the green belt boundary and the Core Strategy has ably demonstrated that the need for additional housing and employment land is justified notwithstanding a need to alter existing green belt boundaries to provide a sustainable pattern of development.

The reasons why the development of the former colliery land for housing would be appropriate development are stated in comments relating to Huncoat.

9. Can your comments be considered by written representations or do you consider it necessary to attend the oral part of the examination?

Written Representations

Oral Examination

YES

If you wish to participate at the oral part of the examination, please state why you consider this to be necessary:
The proposed housing site at the former colliery land at Huncoat is a major development and its removal from the green belt requires justification.

10. Do you wish to be notified:
when the Core Strategy/Accrington Area Action Plan is submitted to Secretary of State for independent examination?
when the Core Strategy/Accrington Area Action Plan is adopted?

YES

Signature  SUSAN BOLTON (FOR GBPP LTD)  Date:  27 SEPTEMBER, 2010

Please return this form to: Hyndburn Borough Council, Planning Services, Scaitcliffe House, Ormerod Street, Accrington, BB5 0PF, or planning@hyndburnbc.gov.uk or by fax to 01254 391625