RSPCA

LAND AT HUNCOAT

REPRESENTATIONS TO HYNDBURN CORE STRATEGY
Introduction

This representation is made on behalf of the RSPCA who own land which includes kennels and other buildings at Huncoat. This statement elaborates upon the original representations and brings them up-to-date with current policy.

1. Green Belt

The original representations commented upon the change to the Green Belt Boundary, and suggested that, if the Link Road was to be constructed, the link road itself would form a much more enduring boundary. Furthermore, if the Green Belt boundary is to be considered in this location it is necessary to consider whether the land owned by the RSPCA should be kept permanently open, or whether excluding it would provide a better boundary, given the removal of the land to the east from the Green Belt.

As indicated in the earlier representations, when the Whinney Hill Link Road is built, the land owned by the RSPCA to the north west of Clough Brook and lying within the Link Road will no longer form part of the wide countryside setting to this part of Huncoat. The proposed Link Road will form a significant barrier both physically and visually. It is therefore considered that, if the colliery site is removed from the Green Belt, the remaining land encompassed by the proposed Link Road will no longer perform any Green Belt function and should also be removed, and that this would result in a boundary to the Green Belt that is more likely to endure in the long-term.

2. Noise

Policy A7 indicates that the site to the north of the Preston/Colne railway line will be developed for 'high quality homes in an attractive landscape setting'.

The original representation on behalf of the RSPCA was accompanied by a noise report that indicated that the noise levels generated by dog barking are similar to those of commercial or industrial processes and in noise and planning terms are similarly incompatible with residential development. The report also concluded that complaints from new residents within housing on the proposed development site would be likely. Clearly, this is an unsatisfactory situation, where there are clear constraints that have been identified at earlier stages of the consultation process that have not been taken into account in the submission document.

The RSPCA is an existing landowner and occupier. At present they are very concerned about the proposed housing development because it could lead to the closure of the centre and the loss of twenty jobs, as there are no funds to rebuild the centre in a way that would minimise the noise disturbance potential. Clearly it is not realistic to expect any legitimate occupier to have to cease their operations because constraints identified at a consultation stage have not been taken into account when bringing forward development plans.

The noise report makes it clear that it is inappropriate to allocate land for housing in such close proximity to the RSPCA kennels as the occupants will be subjected to noise disturbance. Simple orientation and other design factors can be taken into account and would help to reduce noise disturbance within the houses, but this would still leave disturbance within garden areas, or rooms with open windows. This is not, therefore, a location within which to be proposing 'high quality homes in an attractive landscape setting' which would appear to be targeted towards the executive and family end of the market who are most likely to identify the noise as an issue.
It may, of course, be possible for the developers of the new housing to fund a redevelopment of the RSPCA site to create premises that minimise the noise potential from the site. However, this should be clearly identified in the policy because it is not a normal consideration for housing sites such as this.

The alternative option would be to include the whole of the RSPCA site within the housing allocation, or even include part as a mixed use area. Whilst the RSPCA do not specifically wish to relocate their premises, this would allow them to sell their land and relocate to a new site in a location where they are not going to cause disturbance to nearby residents.

This would be compatible with the guidance set out in the Draft National Policy Framework which forms a material consideration. This seeks to increase significantly the delivery of new homes. One of the requirements suggested is that a rolling supply of 'specific deliverable sites' should be identified. This needs to take into account infrastructure, standards and other costs. An allowance of an additional 20% should be included to ensure choice and competition.

Allocating the RSPCA's land for housing would enable the RSPCA to sell their site and relocate to an alternative location where no disturbance would be created. It would also increase the land available for housing within Huncoat, a sustainable location, close to the station with easy access into Accrington Centre by train or bus. If the RSPCA's site is not allocated for housing, the A7 site should also not be allocated for residential development as, without significant investment in the RSPCA site, the environmental conditions for new residents would not be acceptable.

Conclusions

The RSPCA site does not contribute towards the five main purposes of Green Belt as set out in PPG2. The boundary to the Green Belt is being amended in this location and, in accordance with the guidance of PPG2, land that does not perform a Green Belt function should not be included within it. The proposed Whinney Hill Link Road would provide a much more defensible, enduring and appropriate Green Belt boundary to the amended green belt in this area.

The earlier objections by the RSPCA highlighted the potential noise disturbance that would exist if residential development was built on the A7 site. Notwithstanding this concern, no allowance has been made for the potential noise issue in the policy relating to the allocation, and no mention is made that this is a constraint on the site. If residential development is occupied on this site, the RSPCA is likely to be impacted due to noise complaints, and this is likely to result in the closure of the centre and loss of 20 jobs through lack of funds for improvements.

Unless the housing allocation is no longer progressed, or the policy is amended to ensure a contribution towards the RSPCA to allow construction of new buildings that minimise the potential for noise disturbance, the allocation of the RSPCA's site would allow them to relocate to a site where noise disturbance would not be an issue. Given the proximity of the station with easy access to Accrington, together with good public transport links, the site would appear most suitable for residential development, although some mixed development towards the south west might be appropriate given the nearby employment uses.