

PLANNING COMMITTEE DATE: 18th October 2023

APPLICATION NO: F/YR22/0931/F

SITE LOCATION: 10 Redmoor Lane, Wisbech, Cambridgeshire, PE14 0RN

UPDATE

An additional comment public comment was received on the 17th October 2023 and is outlined below:

Regardless of the proposed conditions to mitigate noise and waste pollution I wish to formally object to the Planning Officer's decision to grant this application.

Condition 6 states. The maximum number of dogs kennelled on site be restricted to 120 dogs.

There are no proactive measures in place to prevent the housing of 100 dogs in each of the 2 kennel blocks which will have the capacity to house a total of 200 in total. The proposed condition to restrict the maximum of dogs kept onsite to 120 dogs will be impossible for Fenland Council to monitor as greyhounds are routinely transported on a hourly/daily basis away from the site to tracks or other trainers' kennels.

It will be even harder to enforce the restriction which has the potential open a lengthy and costly process that may result in legal action having to be taken by the council - while the local residents' amenity would continue to be adversely affected.

To make an analogy – would the council grant planning for a hotel that submitted plans for 2 blocks – each having 50 double bedrooms and therefore has the total capacity to accommodate 200 residents and expect the hotel to comply to the occupancy restricting conditions? Both the hotel and kennels are commercial businesses and will have an incentive to maximize profits.

However – unlike the hotel analogy the council will have no authority to view accurate kennel occupancy numbers as it intended for the kennels to be licensed by the self-regulating Greyhound Board of Great Britain.

Another point to consider - should the council find that the kennel occupancy has exceeded the maximum allowed – where will the displaced greyhound go? There is currently an increasingly greyhound homing crisis with all rescues reporting they are full and must turn dogs away. The crisis is very well documented and frankly discussed in this interview by an industry lead publication between the editor and the GBGB's Trainers' Practitioner Director – Peter Harnden – in August of the year.

<https://greyhoundstar.co.uk/rehoming-crisis-peter-harnden>

Condition 7 states: Ensure the existing kennel block is used solely for storage purposes, or another non-noise generating use such as an isolation kennel. There is no evidence to suggest that dogs kept in isolation kennels do not generate noise. Regardless – The GBGB Rules of Racing (212.f) states. “Isolation kennels shall be single kennels of not less than 2.3 metres depth by 1 metre with a small separate paddock, provided in the ratio of one isolation kennel to every 12 greyhounds and shall be entirely separate from the main kennels” <https://rules.gbgb.org.uk/section-13-trainers-transportation-and-residential-kennels/rule-212-minimum-requirements-for-all-residential-licensed-kennels-and-transportation-of-greyhounds/> The submitted plans do not provide for a separate paddock enclosure for each dog kept in isolation and even if there were provisions made for paddocks – the noise pollution would increase and therefore further adversely affect the local residents’ amenity.

Condition 11 states: Provide mechanical ventilation to the new kennel blocks so that windows to the new kennels can remain closed at all times, including in warmer months.

How will the kennels be mechanically ventilated to circulate air if the windows are not openable? If industrial air conditioning units are to be installed has the council calculated how much extra noise pollution will be generated? Is the council considering “Removing the openable door from the northern end of the new kennel blocks, which faces the nearest dwelling” as suggested in Cass Allens NIA? If yes – this will undoubtedly create a fire hazard and will more likely breach Health and Safety standards for employees. Regardless – this condition is in breach of the British Standards Institute specification for Greyhound Trainers’ Residential Kennels – 3.4 Windows - which states that: “Each building and kennel unit shall be provided with artificial light and windows shall be fixed in place with transparent infills. At least one in three windows shall be of such construction that can be opened.” FYI Fenland council should have a copy of this BSI specification.

<https://knowledge.bsigroup.com/products/specification-for-greyhound-trainers-residential-kennels?version=standard>

In conclusion – I would urge the committee to reject this application or at the very least – adjourn the meeting and extend the public consultation period in order to invite comments from the Fire Authorities - Fenlands Council Building Control and the Greyhound Board Of Great Britain – without which – it would be questionable as to whether the committee can reach a fully informed decision on this development.

It should also be noted that should the kennels fail to be licensed by the self-regulating GBGB – the kennels would then have to be licensed by Fenland council and therefore comply with Dog kennel boarding licensing Act amongst other related legislation.

Recommendation: GRANT – The above update does not alter the original recommendation as set out in the agenda.