

Issue:

Flawed Consultation Process in Respect of Bluntisham as a Local Service Centre and Inclusion of Land Allocation BL1 in the Proposed Local Plan

Background

Annette Feeney has asked the Colne Road Action Group to provide a written statement regarding consultation on the proposed change of settlement status for Bluntisham from Small Settlement to Local Service Centre and the consultation regarding inclusion in the Local Plan of land allocation BL1 (Colne Road).

Bluntisham Parish Council, our local MP Shailesh Vara and the former local District Councillors Mike Francis and Robin Carter (who both stood down at the last election over the issue of non-consultation) are all on record as disputing HDC's statements regarding Stage 6 consultations with local stakeholders.

Consultation with Local Stakeholders

The National Planning Policy Framework (NPPF) sets out a number of tests including:

“Whether consultation has been carried out in accordance with the Council’s Statement of Community Involvement and meets the minimum requirements of relevant regulations.”

Paragraph 1.19 of HDC’s Proposed Local Plan Submission states that:

“While preparing the Local Plan, the Council has consulted extensively with residents and other interested stakeholders. Detail on how the Council consulted, and how the Local Plan content evolved as a result of that consultation, is set out in the Statement of Consultation”.

Paragraph 2.1 of HDC’s Statement of Community Involvement highlights that:

“Our approach aims to encourage widespread participation so that decisions are informed by the needs and aspirations of the communities within Huntingdonshire”.

Paragraph 3.2 of HDC’s Statement of Community Involvement makes clear that:

“Town and parish councils have a particular role to play on planning issues, particularly as they have detailed knowledge of the areas they represent”.

Our local MP Shailesh Vara, MP has twice written to HDC’s Leader Councillor Bull challenging the Council’s statements regarding consultation.

In his letter dated 19th January 2018 Shailesh Vara makes specific mention of:

“Serious questions raised as to the late inclusion of the proposed change (LSC Status for Bluntisham) And the considerable concern that at no stage was there any consultation with local residents, the Parish Council or local District Councillors. This makes for a very serious flaw in the process leading up to the final approval of the Plan”

Councillor Bull’s response failed to address the flaw identified by Mr Vara which prompted a further letter dated 31st January and a welcome offer by Councillor Bull in his letter dated 8th Feb “to work with the residents of Bluntisham”.

Encouragingly, the letter ends with an offer of a meeting with the Parish Council.

However, disappointingly when Mr Mark Berg, Chairman of Bluntisham Parish Council, followed up this letter by inviting Cllr Bull and representatives of the planning team to meet with councillors and local residents at an open meeting at Bluntisham Village Hall, this invitation was declined.

The Colne Road Action Group has records of multiple emails from its individual members requesting engagement with officials of Huntingdonshire District Council.

Not only have there been no meaningful responses to these requests, HDC has not included us as a “specific interest group” for their “targeted consultations” in Stage 6 consultations (Paragraph 2.6 of HDC’s Statement of Community involvement)

Consultation Regarding Bluntisham as a Local Service Centre

In none of the consultation documents is Bluntisham referred to as a Local Service Centre.

In the Draft Local Plan dated June 2017, Bluntisham is classified as a Small Settlement. Guidance for development in small settlements is laid out in LP7 according to which Land Allocation BL1 (Colne Road) would not have met the criteria for inclusion in the Local Plan.

During Stage 6, the concept of “small settlements with good sustainability” and “small settlements with reasonable sustainability” was introduced.

However, to our knowledge, no consultation was undertaken with regard to Bluntisham meeting the eligibility criteria for either of these new categories.

In addition, we can find no mention of the designation Local Service Centre or any specific consultation with local stakeholders on whether Bluntisham should be designated a Local Service Centre. Nor can we find minutes from any HDC meeting where LSC statuses were determined or approved.

Indeed, the designation of Local Service Centre appeared for the first time in December 2017 in the Proposed Local Plan submission itself with a new LP9 guiding development and the inclusion of land allocation BL1 (Colne Road).

In its letter dated 23rd January to HDC 2018 Bluntisham Parish Council questions:

“The legality of the decision not to recognise Bluntisham and its residents as stakeholders when changing the status of the village to a Local Service Centre and the abject lack of transparent consultation in relation to the change in the planning tier status of Bluntisham.

The residents, Parish Councils and, as we understand, District Councillors of the three villages were not made aware or consulted with during this process or ahead of the change.”

Consultation Regarding Inclusion of BL1 as a Land Allocation in the Local Plan

In the Draft Local Plan dated June 2017, BL1 is not included as a land allocation.

In the revised Local Plan dated Dec 2017, BL1 is included despite the fact that this land is subject to a non-determined departure planning application ref 17/00906/OUT to which there are 78 written objections from individual residents of Bluntisham as well as documented opposition from the Parish Councils of Bluntisham, Colne and Earith and local district councillors.

The basis for inclusion is the Stage 6 Consultation below:

3 July - 25 August 2017

Huntingdonshire's Local Plan to 2036: Draft Consultation 2017
Huntingdonshire's Local Plan to 2036: Draft Final Sustainability Appraisal 2017
Housing & Economic Land Availability Assessment 2017 Call for Sites 2017

4 October - 3 November 2017

Housing and Economic Land Availability Assessment: October 2017

The BL1 site (Colne Road) was submitted during the call for sites under HELAA during the summer holiday period of 2017 and assessed alongside other allocations in a 4-week period during October 2017.

With regard to the public consultation that took place between July and October 2017, we must point out that HDC did not seek to specifically notify Bluntisham Parish Council, the Colne Road Action Group or any of the individuals who had registered their interest in land at Longacres through planning application ref 17/00906/OUT that input was being sought on the suitability of this site for inclusion in the Local Plan.

As such, we were unaware of the sustainability appraisal for the BL1 Land allocation and unable to provide evidence.

We were also unaware of subsequent updating of key support documents such as the Infrastructure Delivery Plan.

Worryingly, HDC's Statement of Consultation Page 523 states that:

"The planning application (ref 17/00906/OUT) has provided a thorough assessment of all of the technical aspects of the proposals required to achieve a robust planning permission. In this regard, there is no reason for the development not to come forward".

We believe that this statement is at best premature as the planning application is still to be determined despite the targeted determination timing of July 2017 having passed many months ago.

At worst, it is prejudicial to the outcome of the planning application itself, particularly as the same document notes comments about *"major impacts on the local road network, insufficient infrastructure to support development as well as concerns for water, sewerage, electricity, public transport, pollution and availability of local services"*.

The NPPF emphasises the need for the Local Plan to be based on adequate, up-to-date and relevant evidence, whereas the inclusion of BL1 is founded on evidence that is disputed through a large number of objections to a non-determined planning application for the site which were not taken into account during the HELAA process in October 2017. (Please see <http://www.huntingdonshire.gov.uk/planning/view-existing-planning-applications> for further information).

In our view, a more transparent consultation process would have brought more evidence into determining whether to bring land allocation BL1 into the Proposed Local Plan.