

# **Colne Road Action Group**



## **Examination of the Huntingdonshire Local Plan**

### **Submission relating to Matter 11**

### **Proposed Site Allocations Local Service Centres**

**Being considered on 19<sup>th</sup> September 2018**

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On behalf of 104 residents of Bluntisham (listed at the end of this document)

13<sup>th</sup> July 2018

## Issue

Whether the proposed site allocations for the Local Service Centres are justified, effective and consistent with national policy

This submission is limited to questions relating specifically to site allocation  
**Bluntisham BL1- West of Longacres**

## Questions

**1) What is the background to the site allocation? How was it identified and which options were considered?**

### Background

Site BL1 is located in open countryside. The development would adjoin the current northern edge of the village but provide no access to it. The single point of access would be off Colne Road almost directly opposite St Helen's Primary School.

There is no planning history as the entire site which measures 7.78 hectares (19.22 acres) is grade 2 arable land<sup>1</sup> and has been in continuous agricultural use for many decades.



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<sup>1</sup>Huntingdonshire Local Plan to 2036 | Housing & Economic Land Availability Assessment (HELAA) December 2017

## Site Identification

The site originally came forward early in 2017 as an “opportunistic” and “non-compliant” development proposal based on the assertion by land agents, Bidwell’s, that Huntingdonshire District Council could not at that point demonstrate a Five-Year Housing Land Supply.

Although the site was “*not allocated for residential development under HDC’s Development Plan Policy*” (Section 9.2 of Bidwell’s Planning Statement, April 2017<sup>2</sup>), Bidwell’s considered that the Development Plan was not up to date and subsequently submitted outline planning application 17/00906/OUT<sup>3</sup> for 135 dwellings on 12<sup>th</sup> April 2017 on behalf of R2 Developments Limited.

The planning application which is the subject of 79 objections has to date not been determined.

The site was included in the Local Plan Submission dated 28<sup>th</sup> November 2017 which followed a call for sites under HELAA in July 2017 and an assessment of these sites in October 2017.

The Colne Road Action Group has highlighted in a separate submission document<sup>3</sup> the flaws in the Stage 6 consultation process which included HELAA and the subsequent inclusion of BL1 in the Local Plan

## Options

In the period from February to April 2017, Bidwell’s sought feedback on their outline proposals from local residents.

Many concerns were raised at this point and fed back to Bidwell’s. In spite of this, the resultant planning application 17/00906/OUT dated 12<sup>th</sup> April 2017 was largely unaltered from the original plans presented at the Public Exhibition on 21<sup>st</sup> Feb 2017.

In the period July to November 2017 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.

Therefore, there was no possibility to provide options for the site itself or indeed, alternative sites.

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<sup>2</sup> <http://docs.huntingdonshire.gov.uk/AnitePublicDocs/01388839.pdf>

<sup>3</sup> <https://publicaccess.huntingdonshire.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=OP23J7IKM2M00>

However, it should be noted that District Councillors Mike Francis and Robin Carter did retrospectively put forward an alternative option of developing the brown field Minaars<sup>4</sup> site at Earith instead of the greenfield site at Colne Road, but no consideration was given to this proposal.

## **2) What is the scale of housing development proposed?**

According to Page 280 of Huntingdonshire Local Plan to 2036 Proposed Submission Bluntisham BL1 is allocated for residential development of approximately 150 homes.

To put this in context, HDC states that “*a large-scale development is one where the number of residential units to be constructed is 50 or more or a land area of 2 hectares or more*”<sup>5</sup>

Land allocation BL1 Bluntisham has provision for 150 dwellings on an area of 7.8 hectares.

This is more than three times larger than the qualification threshold for large scale development.

In fact, this would be the ninth largest development in the whole of the district and the biggest ever development in the history of Bluntisham, which is a village with a population of 2,003 residents (2011 Census).

## **3) What is the basis for this and is it justified?**

As far as we can judge, HDC justify inclusion of the site in the Local Plan on the basis that it would contribute to the supply of housing to enable it to meet its targets for the district as a whole in the new plan period.

However, an additional 150 houses on a single site in Bluntisham is disproportionate and cannot be justified.

As set out in our Matters 3 Statement<sup>6</sup>, the Colne Road Action Group does not believe that the new settlement status of Local Service Centre is sound.

Even if it were, section 4.102 of the proposed Local Plan states that:

*“Local Service Centres have a small role in meeting the development needs of the district. Such development may be appropriate subject to recognition of the limitations of the services and facilities available and consideration of the impact development would have on the settlement concerned.*”

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<sup>4</sup> Minaars Statement Cllr Francis <https://www.dropbox.com/s/nd4teofd7fd1rjn/MF%20resignation.jpg?raw=1>

<sup>5</sup> Glossary P289 <http://www.huntingdonshire.gov.uk/media/3007/core01-final-local-plan-for-submission.pdf>

<sup>6</sup> Pages 1 and 2 of CRAG Matters Statement 3 <http://huntingdonshire.gov.uk/media/3191/matter-3-colne-road-action-group.pdf>

*It is therefore considered appropriate to limit development primarily to sites within built-up areas, acknowledging the fact that opportunities for development within them will largely be limited to redevelopment opportunities, intensification of use and development of land which relates wholly to existing buildings rather than the surrounding countryside”*

BL1 is clearly not limited development within the existing built-up area and is not justified because the future infrastructure needs to support it as identified in the Infrastructure Delivery Plan Addendum December 2017<sup>7</sup> (LSC2, LSC5, LSC8, LSC10, LSC18 to LSC24, LSC 34 to LSC35 and LSC44 to LSC49), have not been funded and are in any event not achievable due to physical constraints.

#### **4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?**

As stated in 1) above, BL1 is subject to outline planning application 17/00906/OUT for 135 dwellings submitted on 12<sup>th</sup> April 2017 on behalf of R2 Developments Limited.

This application has 79 objections and has not yet been determined. We believe that inclusion of the site in the Local Plan is prejudicial to the outcome of the planning application itself.

#### **5) What are the benefits that the proposed development would bring?**

There are a number of benefits that the proposed development would bring. These include: affordable homes, additional spending to boost the local economy and developer’s contributions in the form of CIL.

That said, it should be noted that affordable housing for local people is being provided through the construction of 10 affordable properties 400 metres to the North of the proposed site at Bluntisham Road, Colne. There is also a planning application, 18/00102/FUL<sup>8</sup>, for a further 11 affordable homes off Bluntisham Heath Road, Bluntisham which is supported by the Parish Council and local residents.

The Colne Road Action Group does not oppose development within Bluntisham provided that such development is sustainable.

BL1, by virtue of its size and location, would be more detrimental than beneficial for reasons set out in 6), 7) and 8) below.

#### **6) What are the potential adverse impacts of developing the site? How could they be mitigated?**

The adverse impacts of developing the site include all of the following:

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<sup>7</sup> Table 38: Local Service Centres Infrastructure Requirements 2016 – 2036  
<http://huntingdonshire.gov.uk/media/2861/infrastructure-delivery-plan-addendum.pdf>

<sup>8</sup> 18/00102/FUL <https://publicaccess.huntingdonshire.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=P2OWX5IKJFR00>

18/00102/FUL was recommended for approval at the HDC DMC meeting subject to some conditions <http://applications.huntingdonshire.gov.uk/moderngov/ieListDocuments.aspx?CId=10216&Mid=7413&Ver=4>

## During construction

1. **Health and safety** risk to children and parents due to heavy vehicles turning almost directly opposite the school into the site. Potential mitigation: Site access restricted at certain hours of the day.
2. **Noise pollution.** The noise from the building works would not be conducive to studying. Potential mitigation: Additional restrictions on noise emissions during school hours.
3. **Dust and air pollution** which could potentially be mitigated by effective site screening
4. **Vibration damage to listed buildings** on High Street, East Street and Colne Road due to construction vehicles having to gain access to the building site. No mitigation is possible as access roads through Colne and Bluntisham have a 7.5t weight limit and thatched cottages are without deep foundations.
5. **Irreversible loss of the best and most versatile agricultural land** in contravention of LP11<sup>9</sup> of the proposed Local Plan. No mitigation is possible.
6. **Loss of a natural habitat** against the guidance of Para 9 of the NPF which seeks to promote “nett gains for nature”. No mitigation is possible.

## After construction

1. **Impact of additional car traffic entering and leaving the village.** The Institute of Highways and Transportation (IHT)<sup>10</sup> provides guidance on walking and cycling distances with the potential of substituting car trips – these being 800 metres and 5kms respectively. With no new employment being created in Bluntisham and limited public transport, it can be assumed that new residents will commute to work by car. 150 houses will equate to approximately 250 to 300 additional cars, with many of these departing and returning during peak hours. No mitigation is possible.
2. **Impact on traffic in surrounding areas.** Travel out of the village in a southerly, easterly or westerly direction is already congested due to other surrounding developments in St Ives, Northstowe and Cambridge and the impact of the guided bus crossing.

This proposed development will add to the cumulative effect of increased traffic on local roads especially on the A1123 at Earith Bridge, Earith (which is sometimes closed due to flooding), the A1123 at the Stocks Bridge/Harrison Way roundabout and along the A1096 Harrison Way towards the A14.

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<sup>9</sup> LP11 P61 <http://www.huntingdonshire.gov.uk/media/3007/core01-final-local-plan-for-submission.pdf>

<sup>10</sup> Providing for Journeys on Foot <http://www.ciht.org.uk/en/knowledge/publications/index.cfm/providing-for-journeys-on-foot-2000>

The Infrastructure Delivery Plan specifically points out that:

*“Traffic conditions around St Ives can experience significant levels of congestion” (Page 37)”*.

These roads are already at capacity without any additional traffic associated with the proposed development. No mitigation is possible without substantial new investments in transport infrastructure.

**3. Impact on road safety.** The site access would be directly opposite St Helen's Primary School. The management of additional car movements during peak hours would need to be carefully considered as would parked cars obscuring visibility at the entrance to both the school and the development site itself.

**4. Impact of light pollution on properties adjacent to proposed site entrance**  
These properties are approximately 1 metre below the level of Colne Road and would suffer from light intrusion in both ground and first floor rooms from the headlamps of cars exiting the development site.

**5. Impact on school places.** On 15<sup>th</sup> May 2018, Executive Head Teacher Mrs Ford, published an open letter<sup>11</sup> which stated that the “school could not accommodate additional pupils within its current structure and accommodation” and that it “agreed (with the County Council) that the challenges that this development (site allocation BL1) would bring would outweigh any potential benefits” Potential mitigation through developer contributions to support additional school places.

**6. Impact on GP Services.** NHS England wrote to HDC on 17<sup>th</sup> Jan 2018<sup>12</sup> highlighting that:

*“There is one GP branch surgery within a 2 km radius of the proposed development (BL1 Bluntisham), Church Street Health Centre, Bluntisham Branch. The GP practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area.”*

Potential mitigation is through developer contributions to support additional GP provision. However, there is a shortage of GPs across the UK and increasing GP numbers is a major challenge for the new Health Secretary, Matthew Hancock.

In summary, the adverse impacts – even after mitigation - of developing the site would significantly and demonstrably outweigh the benefits.

At this scale of development in this location set against the current infrastructure and available local services, this site cannot be considered to be sustainable development as set out in National Planning Policy Framework (NPPF) (2012)

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<sup>11</sup> Open letter from Executive Head of St Helen's Primary School <http://docs.huntingdonshire.gov.uk/AnitePublicDocs/01429546.pdf>

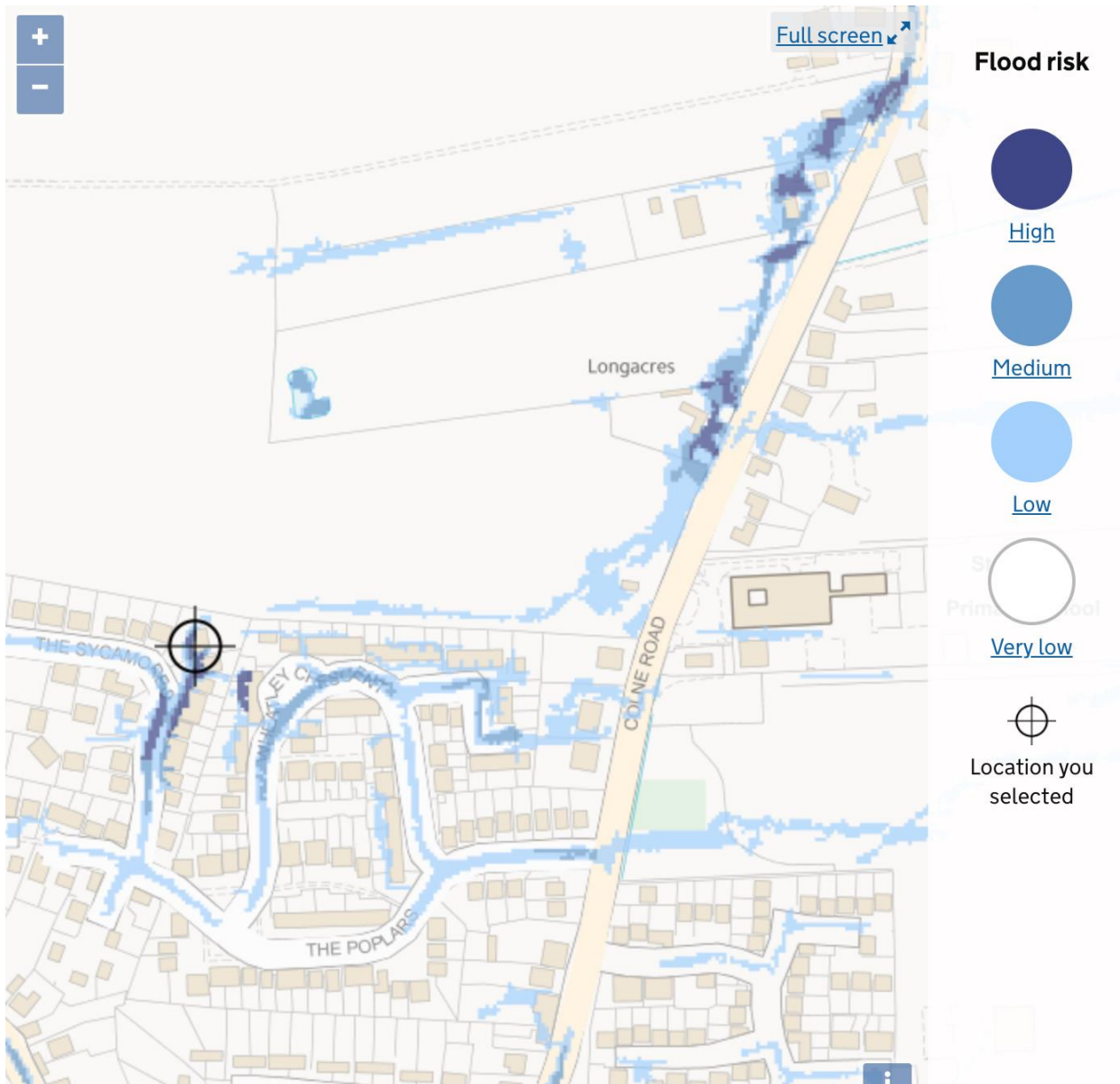
<sup>12</sup> NHS England statement <http://docs.huntingdonshire.gov.uk/AnitePublicDocs/01422871.pdf>

**7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?**

The Environment Agency maps show that the site lies in flood risk zone 1. To the south and south east lies a wide band of flood risk zone 3b land. It is not known whether the sequential or exception tests have been applied for.

Notwithstanding the FZ1 rating of the site itself, it should be noted that Longacres is at high risk of surface water flooding. The addition of 150 new homes on a site with a gradient running East to West will increase this flood risk at the bottom of the site.

The developers are proposing an attenuation scheme at the site entrance right opposite St Helen's Primary School which in itself may be considered a potential health and safety risk during time of excessive rain. (please see map below)





**8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?**

Page 2 of HDC's Infrastructure Delivery Plan Addendum December 2017 prioritises Infrastructure requirements by three categories: 'Critical', 'Essential' and 'Desirable' and further divides them according to whether they are district level or allocated to a location within a particular settlement hierarchy. It also makes clear that *"there are several schemes where the costs are currently unknown"*.

In this structure investments relating to Bluntisham are listed in Table 38: Local Service Centres Infrastructure Requirements 2016 – 2036.

Of the 179 dwellings in the Local Plan allocation for Bluntisham, 150 are at BL1 and clearly the large BL1 allocation drives the additional infrastructure requirements.

Even excluding schemes where costs are unknown, the total funding gap for "essential infrastructure" for Bluntisham totals £3.25M.

The report clearly identifies the provision of additional primary and secondary school places (LSC5 and LCS8) as a major investment requirement and the Executive Head of St Helen's School has already raised her concerns about the impact of the proposed development (see point 6 above).

LSC18 to LSC 24, LSC34 to LSC35 and LSC44 to LSC 49 require a total investment of £0.66M in community facilities. Not only is there no funding for this, Bluntisham Parish Council has written to HDC to explain that there is no physical space available for these extra facilities.

Perhaps the most intractable problem is health provision (LSC10). HDC points to *"an overall capacity deficit for GP surgeries at a District level"*.

For Bluntisham, the situation is acute with a GP who visits Bluntisham for only one and half hours per week and already has 2130 patients on his list<sup>13</sup> which is far in excess of the national average of 1724 patients per GP.

On page 21 of the Infrastructure Delivery Plan HDC states that *"suitable mitigation is required"* for GP provision but provides no mitigation measures. This is likely to be due to the fact that a shortage of GPs is not just a district problem, it is a national problem as highlighted by the Financial Times on 31<sup>st</sup> August 2017 in their article "GPs Quit NHS in England at the rate of 400 per Month"<sup>14</sup>

As stated in 6 above NHS England have specifically written to HDC with their concerns relating to pressure on local primary health care resulting from developing the Colne Road site.

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<sup>13</sup> Bluntisham GP data <https://www.nhs.uk/Services/GP/Overview/DefaultView.aspx?id=39456>

<sup>14</sup> GPs Quit NHS in England at the rate of 400 per Month <https://www.ft.com/content/16875d1c-8e4e-11e7-9084-d0c17942ba93>

Finally, Infrastructure Delivery Plan Addendum December 2017 Pages 38 and 39 state that Somersham Water Recycling Centre has been identified as exceeding capacity based on the future growth identified in the Local Plan (please see 9 below for further information)

**9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved? Or, if water supply and sewage treatment issues are an important factor then Water Cycle Studies and evidence from the Environment Agency and the relevant utility companies would be expected to support the plan's approach.**

Waste water from BL1 would be treated at Somersham Water Recycling Centre which does not have available capacity for additional flows (see 8 above).

New investment would therefore be required by Anglian Water if BL1 were to go ahead. It should be considered whether this investment could be avoided by developing at alternative sites in the district where water recycling centres do have sufficient capacity.

The Colne Road Action Group cannot find any records of Water Cycle Studies being carried out since 2014.

However, given occurrences reported by local residents of both blockage of the foul water drains and surface flooding at times of heavy rainfall, we believe that new Water Cycle Studies should be commissioned in connection with the development of BL1.

**10) Is the site realistically viable and deliverable?**

The developers and HDC believe that the site is deliverable.

Colne Road Action Group contends that just because a site can be developed it does not mean that it should be developed, especially where the likely adverse impacts would outweigh the potential benefits.

**11) What is the expected timescale and rate of development and is this realistic?**

We understand that the development of the site will take between 4 and 5 years.

During this time there is likely to be significant adverse impacts on the local community (please see 6 above)

**12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?**

The site itself is disproportionately large. It should be noted that HELAA assessed a smaller site of approx. 2.5 ha<sup>15</sup> as well as the larger site of 7.8 ha.

The biggest issue with the boundary is the single access point to the site from Colne Road (please see 6 above).

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<sup>15</sup> Page 764 Housing & Economic Land Availability Assessment (HELAA) December 2017

**13) Are the detailed policy requirements effective, justified and consistent with national policy?**

The Colne Road Action Group believes that inclusion of land allocation BL1 in the Local Plan is not effective, justified or consistent with national policy as set out in the Localism Act 2011 and the National Planning Policy Framework (NPPF) (2012).

One of the core principles of The Localism Act is to give members of the public enough influence over decisions that make a big difference to their lives.

BL1 would be the largest development in the history of Bluntisham having a clear and direct impact on the lives of hundreds of people and yet HDC has not consulted with local residents or our elected representatives (please see Colne Road Action Group's separate written statement<sup>16</sup> for further details).

The NPPF sets out the three dimensions to sustainable development - an economic role, a social role and an environmental role - and outlines the presumption in favour of sustainable development unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Sections 6), 7) and 8) of this statement clearly demonstrate the adverse impacts of BL1 and how they would outweigh any potential benefits of development.

Finally, the evidence base used to support the inclusion of BL1 in the Local Plan is largely drawn from a hastily completed HELAA assessment which was carried out in October 2017 without seeking information from stakeholders with detailed local knowledge of the site.

This has led to a more favourable assessment of the site than is justified by the facts (please see Appendix A – Commentary on HELAA assessment)

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<sup>16</sup> <http://huntingdonshire.gov.uk/media/3262/matter-3-colne-road-action-group-later-statement-submitted-6-7-18.pdf>

**List of the residents represented by Colne Road Action Group**

Dr A K R Fuller	Michelle Dunn	Phill Lucas
Russell Banks	Bethany Dunn	Mike Barwell
Judy Brass	Amanda Young	V Fairhurst
Robin Laud	M Neale	Mr & Mrs T Fairhurst
D R Way	Victoria Neale	Malcolm O'Neil
Steven John Barrow	Natalie Ernst	Gill O'Neil
Margaret Barrow	Matthew Ernst	C Harrison
T J Guy	Sarah Cooper	Katherine Woods
P D Way	Martin Cooper	Michelle Stoneham
G E Routledge	Alison Knowles	Keith Lipscomb
John Routledge	John A Morgan	Ann Lipscomb
D S Moorman	Susan E Morgan	Ian Lipscomb
Wendy Richardson	A P Parker	Lauren Brant
Ruth Jarvis	J W Parker	Bronwyn Leask
Manda Lusmore	Brian Richardson	Jane Hart
Simon Budd	Susan Delaney	Tina Cornah
Rob Butterworth	R H Delaney	Patrick Cornah
Susannah Harris	David W Owen	Maria J Dorman
Ian Shepherd	R G W Everest	P Myers
Andrea Shepherd	S J Everest	G Myers
K Harrison	Carol Arrowsmith	Barrie Stoneham
Gavin Deane	David Goodier	J V George
Steve Smith	Sarah Goodier	A M Brooks
Ashley John Thompson	V McGarrey	R M Brooks
Deborah Ann Thompson	Amie Lill	Diana Wilson
T R Pomfret	Barry Lill	John M Wilson
C A Pomfret	Dr Beverley Sherbon	David Bullinaria
M Darbyshire	Jane Godfrey	Caroline Chipper
K Darbyshire	Ian Fitzsimmons	Andy Lyons
R R Hewitt	Robert Arrowsmith	Holly Lyons
Jacqueline Watson	Valerie Mitchell	Jenny Smith
Steve Catchpole	Ken Mitchell	Marian Land
Joseph Burr	Carol Tacq	Melvyn Sibson
C M Burr	Roger Tacq	
	Lynn Lucas	