[redacted]

From: Annette Feeney <Annette.Feeney@huntingdonshiredc.org.uk>
Sent: 26 September 2018 15:30
To: Elworthy, Natalie (Planning)
Subject: Fw: HELAA - West of Longacres (larger site), Bluntisham (157) = Land Allocation BL1
Attachments: matter-11-colne-road-action-group-appendix-a-commentary-on-helaa-assessment-oct-2017.pdf

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From: Chris Dunn [redacted]
Sent: 23 September 2018 11:31
To: Annette Feeney
Cc: [redacted]
Subject: HELAA - West of Longacres (larger site), Bluntisham (157) = Land Allocation BL1

Good morning Annette,

At the Matter 11 Hearing we restated our concerns that the HELAA for BL1 "West of Longacres (larger site), Bluntisham (157)" – Pages 768 to 771 presented an overly positive assessment of the site. Please refer to the link below:

http://www.huntingdonshire.gov.uk/media/2862/housing-and-economic-land-availability-assessment.pdf

In our pre-hearing written statement we had taken the liberty of providing what we considered to be a more realistic picture of the site (please see attached).

As the HELAA provides the basis for inclusion of BL1 in the Local Plan (and neither CRAG nor Bluntisham Parish Council was given any input at the time it was carried out), we consider it appropriate to reiterate our comments made on Weds 19th September 2018, concerning the following statements:

1. Bluntisham has a "good bus service" as stated on Page 763.

The last Stagecoach Guided Bus Service A departs at 07:12 in the morning and the latest return to the village is at 17:18 in the evening making this unsuitable for commuting to work in Cambridge.

The Service 21 towards St Ives operates just 3 times per day, starting at 10 am in the morning and is not a viable option for those Bluntisham residents working in St Ives.

Even the new Cycleway does not provide an alternative, considering that St Ives is more than 5km distant from Bluntisham and therefore outside of the commutable by bicycle distances laid down by IHT.

2. A doctors surgery is located within the village hall, and St Helen's Primary School is located in the North of the village as stated on Page 763

The nature and extent of these facilities was discussed at length on Wednesday 19th Sept and is covered by our subsequent emails dated 21st and 22nd September. In relation to these facilities BL1 is not sustainable.

3. BL1 has no known transport infrastructure constraints as stated on Page 770

Page 770 also states "*that development at this site will generate a significant amount of additional traffic. A transport assessment will be required to demonstrate that safe, appropriate access can be provided from Colne Road. It will also need to demonstrate that the wider road network can absorb additional traffic created by the development, including*
the junction with East Street and those leading to the A1123"

Paul Davies highlighted the difficulties of travelling on the A1123 from Bluntisham through Earith where the road regularly floods onto the congested B1050 through Willingham and the new town of Northstow onto the A14 at Bar Hill and onwards towards Cambridge.

Travelling out of the village on the A1123 towards Needingworth in order to access the A14 towards Cambridge on the other side of St Ives is equally congested.

In fact, HDC's Infrastructure Delivery Plan specifically points out that "*Traffic conditions around…St Ives can experience significant levels of congestion" (Page 37)*"

"*The A14 scheme will not reduce pressure on the A1123 around St Ives. Planned growth in this area would increase congestion and delays on the current network" (Page 39).*

Page 770 of the HELAA also highlights that "*Transport and safe highway access will be a particular constraint for this site given its location directly opposite St Helen's Primary School*"

In addition to safety during construction we also raised the concern of damage to listed buildings during the extensive construction period.

The representative from Cambridgeshire County Council's highways scheme was unaware of the 7.5 t weight limit on access roads and this had therefore not been taken into account when conducting the HELAA for BL1.

<u>There is potential for significant damage to listed buildings on Colne Road and no mitigation was offered at the Matter 11 Hearing</u>.

4. An ecological survey should be undertaken (Page 770)

BL1 is Grade 2 agricultural land with mature trees and hedgerows which is home to nocturnal wildlife such as foxes, bats, hedgehogs and badgers. We believe that an ecological survey may establish the presence of protected species in this natural habitat.

We should further point out that developing BL1would contravene both LP11 (development in the countryside) and 4.117 of the Local Plan that states:

"*A proposal should not adversely affect the character and tranquillity of the countryside and should ensure that it will not give rise to impacts that would reduce opportunities for others to use and enjoy the countryside, including for wildlife. In particular, a proposal should not create artificial light in an area with a potentially high impact on wildlife or on intrinsically dark landscapes*".

Finally, we should like to point out that there are some inconsistencies in the rating scheme applied by HDC.

Here are 2 examples relating to BL1 and BL2:

1. West of Longacres (larger site), Bluntisham (157) vs. West of Longacres (smaller site), Bluntisham (159)

On the smaller site (159) question 4b is given a green + rating, versus a blue ~ on the larger site (157). Both sites should be rated the same.

2. West of Longacres (larger site), Bluntisham (157) vs. North of 10 Station Road, Bluntisham (015)

Question 16 is given a blue ~ rating for 157 (BL1) but a red – rating for 015 (BL2). Both sites should be rated the same.

Please confirm that this email will be read and acknowledged as part of our statements in regard to Matter 11.

Kind regards,

Chris Dunn
On behalf of the Colne Road Action Group

Sustainability Assessment Objective	*Decision aiding question*	*Original HELAA Appraisal*	*CRAG Revised appraisal*	*Commentary*
1. Minimise development on greenfield land, maximise development on previously developed land or land with the lowest agricultural value	Is more than half the site Previously Developed Land (PDL)?	-	- -	No. Proposed development is a Greenfield site
	Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural)?	~	-	All of the land is classed as Grade 2.
	Is the site in an area where higher density development is appropriate?	-	-	Adjacent to medium density modern housing currently forming a straight edge to the village.
5. Protect, maintain and enhance biodiversity and habitats	Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS?	~	~	The nearest designated site is Heath Fruit Farm which is approximately 700m away. Berry Fen SSSI is approximately 1km away.
	Are protected species known to exist on the site or is there potential for protected species to exist on the site[286]?[287]	~	-	There is potential for protected species as the site is vacant and bordered by trees and hedgerows on three sides and contains a small semi-derelict building.
6. Protect, maintain and enhance landscape and townscape character and the sense of place of our settlements	Will development have a significant impact on the surrounding townscape or landscape?	~	-	The land slopes gently down from the western boundary towards the road frontage along the eastern side. It is an open arable field with mixed hedges, trees and fencing on all except the western boundary. Proposed Development and format would be highly visible/intrusive from adjoining housing to the south. There are no publicly accessible view points from the north and west so impact there would be reduced.
7. Protect, maintain and enhance heritage assets, whether they are designated or not	Will development impact on heritage assets or their settings?	+	-	During development heavy good vehicles will be passing close by various Grade 2 listed buildings. Bluntisham and Colne have 7.5T weight limits and listed buildings will be subject to vibration damage
10. Avoid unnecessary light, noise and visual pollution	Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	+	-	The development undertaken in its current format would have significant impact to neighboring properties. Visual impact to the South and severe light pollution (headlights) to properties opposite the access road on Colne Road.

17. Improve the quality, range and accessibility of social and community services and facilities including promotion of multi-purpose design and use and efficient use of these resources	Is the site within 400m of a food shop?	-	- -	The nearest higher order Service centre (allowing for weekly family shop) is St.Ives (7km). BP Garage is 1.3km away for daily amenity. Access to both will be by car increasing local traffic flows
	Is the site within 1km of a GP surgery/ health centre?	+	- -	No. There is a branch surgery for 1.5hrs/week in Bluntisham village hall. This surgery has no ability to absorb any more patients as per NHS statement Jan 18 against a general backdrop of under provision of GP services in the area.
18. Improve access to satisfying work, appropriate to skills, potential and place of residence	Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	-	- -	Earith Business park is approximately 2.8km away. As of 5th Feb there were 3 vacancies. For employment opportunities people would have to travel to St.Ives ,Huntingdon and Cambridge increasing local traffic flows.

Constraints Analysis

Transport and safe highway access will be a particular constraint for this site given its location directly opposite St Helen's Primary School. Development at this site will generate a significant amount of additional traffic. A transport assessment will be required to demonstrate that safe, appropriate access can be provided from Colne Road without impacting neighboring property amenity. It will also need to demonstrate that the wider road network can absorb additional traffic created by the development, including the junction with East Street and those leading to the A1123.

The site is bounded by a mature hedgerows on the eastern frontage and mixed hedging and fencing to residential properties along the southern boundary. It is located on the northern edge of Bluntisham but impact on the wider landscape to the north and west is reduced by the landform which slopes down from these boundaries towards Colne Road. The design of any development proposal and its landscaping scheme should demonstrate how it will mitigate and minimize landscape and flooding impact.

Due to the presence of mature trees and hedgerows on the site and ponds within the vicinity there are protected species existing on the site. An ecological survey should be undertaken, and development should ensure that any impacts on protected species are avoided, mitigated, or compensated for, and that opportunities are taken to enhance biodiversity.

This land was not assessed in the Detailed WCS. Taking a cautious approach it is assumed that some work may be necessary to ensure there would be no adverse impacts on the water supply and foul sewerage networks. A preplanning enquiry with Anglian Water Services will be required to confirm that these networks have capacity to accommodate development proposals at this site.

It is understood that spare capacity currently exists at St Helen's Primary School. However, the potential scale of development at this site will create the need for a range of services and community facilities by residents and users. Some of these services and facilities will be expected to be provided on site.

[redacted]

From: Annette Feeney <Annette.Feeney@huntingdonshiredc.org.uk>
Sent: 26 September 2018 15:31
To: Elworthy, Natalie (Planning)
Subject: Fw: Matter 11 - Clarification of the Capacity of St Helen's School as requested by the Inspector
Attachments: Mrs Ford Letter.jpg

From: Chris Dunn [redacted]
Sent: 21 September 2018 16:49
To: Annette Feeney
Cc: [redacted]
Subject: Matter 11 - Clarification of the Capacity of St Helen's School as requested by the Inspector

Good afternoon Annette,

As you know there was some considerable discussion at the Matters Hearing 11 on Wednesday 19th Sept about the capacity of St Helen's Primary School in Bluntisham.

On behalf of the Colne Road Action Group I stated that the capacity of the school is 210, whereas Ms Bond of HDC said that the capacity was 330.

We disputed this figure as being another example of HDC providing inaccurate information.

At the end of the debate, the Inspector asked me to clarify the source of the information that I quoted at the meeting.

The 210 capacity comes directly from Cambridgeshire County Council and is based on the Published Admission Number (PAN).

As you know, PAN is the number of pupils in each year group that the admission authority has agreed will be admitted without causing problems for the school.

The PAN for St Helen's is 30 and has been for each of the last 3 years. There are 7 year groups in the school and the capacity of the school is therefore 210.

The 210 number that we quoted is confirmed on Cambridgeshire County Council's website. Please see below:

https://www.cambridgeshire.gov.uk/residents/children-and-families/schools-&-learning/apply-for-a-school-place/determined-admission-arrangements/determined-admission-arrangements-annual-consultation-2018/19/

Determined admission arrangements 2018/19 - Determined ...

www.cambridgeshire.gov.uk

Information about applying for a nursery, primary, junior, middle or secondary school place in

Cambridgeshire, as well as appealing if your child is refused a school place.

It is also confirmed on the Government's own official website Gov.uk. Please follow the link below:

https://www.get-information-schools.service.gov.uk/Establishments/Establishment/Details/110888

There are also many other non-Government sites that also quote 210 as the school's capacity, for example:

https://schooletc.co.uk/school-st-helens-primary-school-110888

https://www.getthedata.com/school/st-helens-primary-school-110888

The school website itself confirms the PAN in its admission policy which also clarifies that the school serves the villages of Bluntisham and Colne but is open to pupils outside of the catchment area if places are available- i.e. the PAN has not been exceeded. Please see the link below for further information.

https://www.horizonslearning.org/wp-content/uploads/2018/01/Admissions-Policy-St.Helens-1.pdf

Ofsted actually makes note of the fact that:

"*The school is smaller than the average-sized primary school*" Page 3 Ofsted Inspection report: St Helen's Primary School, 11–12 February 2015

https://reports.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/110888
The Executive Headteacher of St Helen's Primary School, Mrs Ford, wrote an open letter to the Community on 15th May 2018.

This letter followed a meeting on Monday 30th April 2018 with representatives from Huntingdon District Council Planning Department, Cambridgeshire County Council and St Helen's Primary School in response to planning application 17/00906/OUT at land allocation BL1.

In it she quite clearly states *that* "*the development (BL1) would not bring additional benefits to the school*" and that "*the school would not be able to accommodate (the additional children) within its current structure and accommodation*"

I quoted from this letter at the hearing itself and I attach it to this email.

I was surprised and dismayed that representatives of HDC's Planning Department were seemingly unaware of the letter and the position of the Executive Headteacher who made it quite clear in her meeting with them less than 6 months ago that the "*challenges of this development (BL1) would outweigh any potential benefits*"

Please confirm that this email will be read and acknowledged as part of our statements in regard to Matter 11.

Many thanks.

Kind regards,

Chris Dunn
On behalf of the Colne Road Action Group

Executive Headteacher: Mrs Becky Ford
Email: [redacted]

Inspire, Believe, Achieve

Chair of Governors: Mr Barry Smethurst
Email: [redacted]

Tuesday, 15 May 2018

To Whom It May Concern,

Re: Outline planning application for residential development of up to 135 dwellings and additional parking for St. Helen's Primary School, including vehicular access, public open space, pedestrian links, car parking, drainage, and other associated works.

Following a meeting on Monday 30th May of representatives from Huntingdon District Council Planning Department, Cambridgeshire County Council and St. Helen's Primary School I write to confirm that the school has reviewed it's positon in relation to the above development.

Further information has been brought to our attention and led us to the conclusion that the development would not bring additional benefits to the school but would in fact present significant challenges to the school in terms of accommodating the additional children.

The preliminary forecasts surrounding the number of additional children that would require places at the school suggest that the school would not able to accommodate them within its current structure and accommodation. The quality of provision at the school would be compromised by increasing class sizes and complicated class structures. In addition to this we're concerned that children living in the catchment area currently, may not be able to secure places at the school as pupils within the development would have a higher priority as a result of their proximity to the school. This would result in pupils currently living in catchment being pushed out to surrounding schools.

On further consideration the school has agreed that the challenges this development would bring outweigh any potential benefits and we share the concerns expressed by the County Council.

Yours sincerely

[redacted]

Becky Ford
Executive Headteacher

Head of School: Mrs Claire Macdonald
Tel: 01480 462007
Email: office@holywell.cambs.sch.uk

Head of School: Mrs Rebecca Bierton
Tel: 01487 840412
Email: office@somersham.cambs.sch.uk

Interim Head of School: Mrs Julia Walker
Tel: 01487 841468
Email: office@st-helens.cambs.sch.uk

[redacted]

From: Annette Feeney <Annette.Feeney@huntingdonshiredc.org.uk>
Sent: 26 September 2018 15:31
To: Elworthy, Natalie (Planning)
Subject: Fw: Follow up to the debate on Bluntisham Doctor's Surgery and GP Provision
Attachments: Letter from NHS England.pdf

From: Chris Dunn [redacted]
Sent: 22 September 2018 19:16
To: Annette Feeney
Cc: [redacted]
Subject: Follow up to the debate on Bluntisham Doctor's Surgery and GP Provision

Good evening Annette,

At the Matter 11 Hearing we debated again whether Bluntisham could be considered to have its own Doctor's Surgery or not.

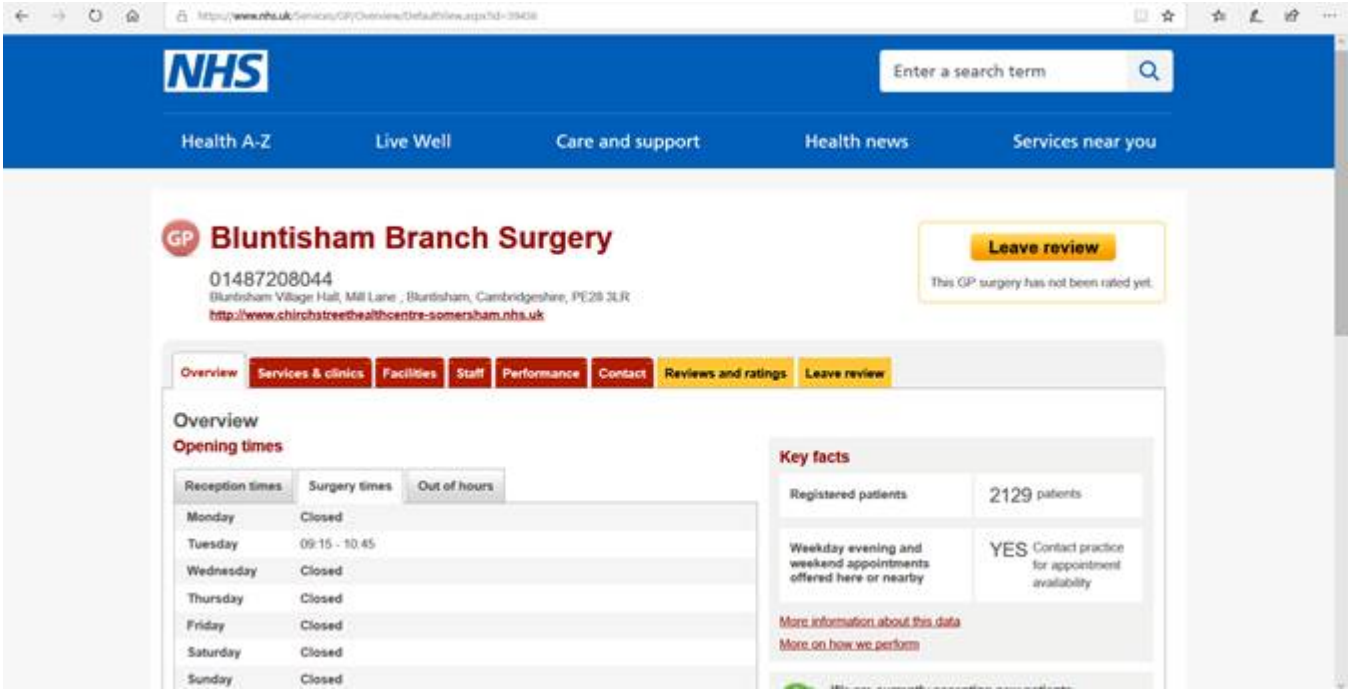
In their statement dated 28.08.2018 Bluntisham Parish Council confirmed that Dr Lui, a GP based at Church Street Surgery, Somersham, rents rooms within Bluntisham Village Hall and sees patients there once per week for one and half hours only on a Tuesday morning.

This is evidenced by the NHS. Please see the screenshot below and follow https://www.nhs.uk/Services/GP/Overview/DefaultView.aspx?id=39456 for further information:

Overview - Bluntisham Branch Surgery - NHS

www.nhs.uk

Official information from NHS about Bluntisham Branch Surgery including contact details, directions, opening hours and service/treatment details



When discussing this on Wednesday I pointed out that a GP seeing patients for **just 90 minutes per week** could not constitute having a Doctor's Surgery.

In response, Ms Clara Kerr, suggested that HDC "*did not specify the quantum*" when stating that a village had to have a Doctor's Surgery in order to be classified as an LSC.

This is incorrect because HDC does actually specify the quantum in Figure 27, Page 93 of the Huntingdonshire District Council Infrastructure Delivery Plan published in June 2017. Please see the link below:

http://www.huntingdonshire.gov.uk/media/2694/infrastructure-delivery-plan.pdf

According to the published table Bluntisham has a surgery called "The Village Hall, Branch" with **0.5 of a GP and 550.25 patients registered**. Applying an average patient to GP ratio of 1:1800, the table concludes that the Bluntisham surgery could accommodate another 196.75 patients!

The reality is of course different. There is no surgery at Bluntisham. The practice that offers an outreach to Bluntisham and also the neighbouring village Earith is Church Street Health Centre Somersham.

This practice has one GP, Dr Lui, who has a list of 2129 patients (well above the national average of 1724) drawn from residents of the villages of Somersham, Earith, Colne, Bluntisham, Pidley, Oldhurst, Woodhurst and Needingworth.

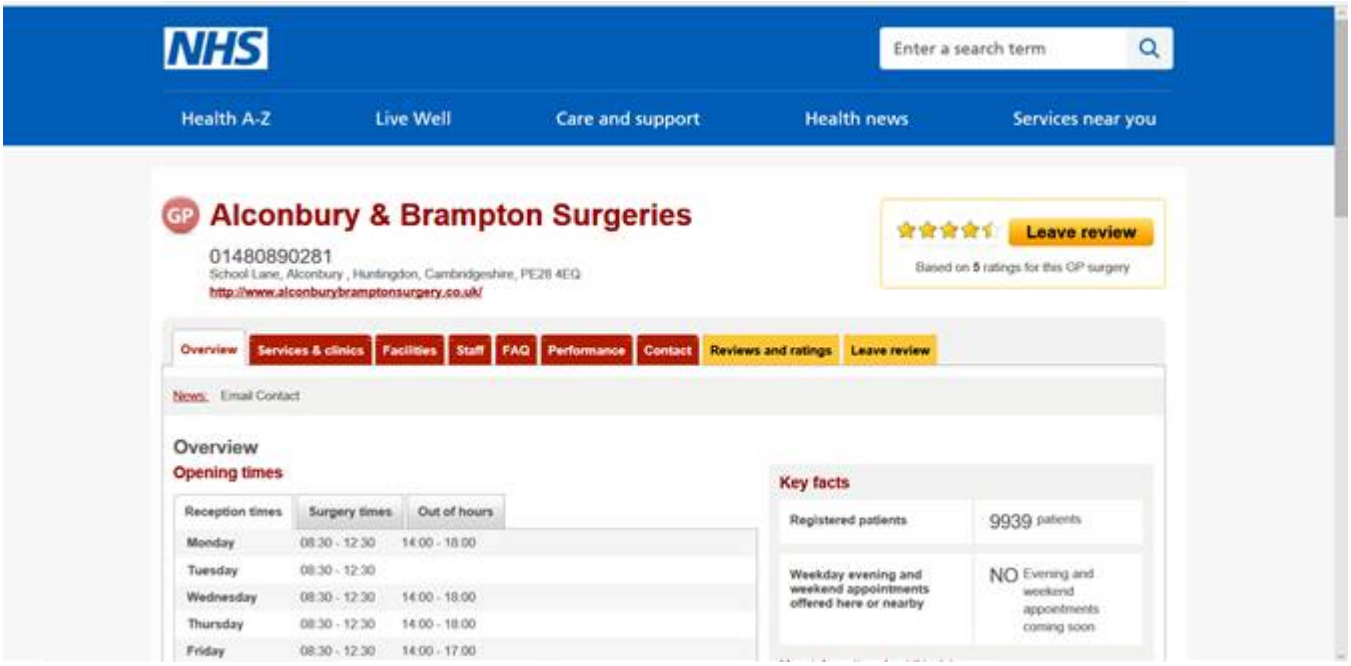
As confirmed above Dr Lui visits Bluntisham for **just 1.5 hours per week**. Assuming an average 36 hour working week this would equate to **just 0.04 of a GP based in Bluntisham**

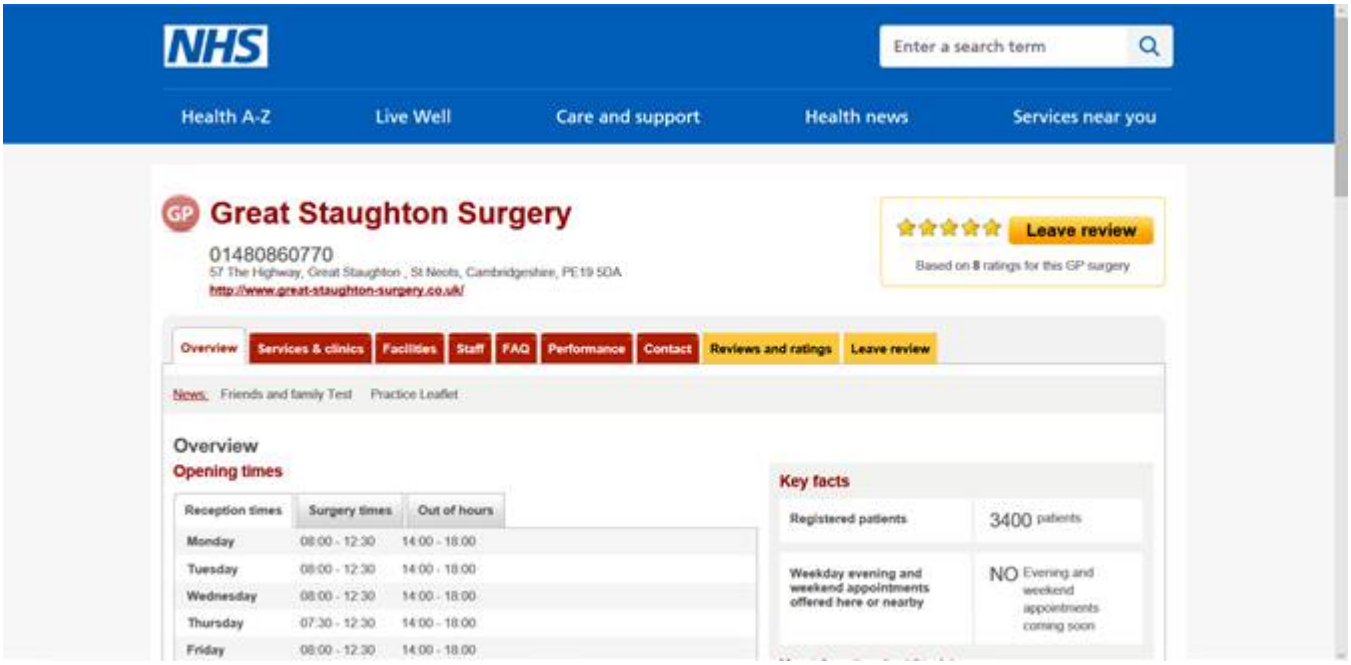
The fact that Bluntisham Parish Council partners with a local GP to provide consultations once per week on a Tuesday morning for one and half hours only cannot in any way be interpreted as Bluntisham having its own Doctor's surgery.

To illustrate this very important point at the Matter 11 Hearing I compared Bluntisham with Alconbury and Great Staughton, these being the 2 other settlements designated as LSCs in the Local Plan.

Unlike Bluntisham, both of these villages have dedicated full time GP surgeries. Great Staughton has 3 doctors and 3400 patients (GP to patient ratio of 1:133 which is below the national average). Alconbury has 6 doctors with 9731 registered patients (GP to patient ratio of 1:1622 which is also below the national average).

Please see screenshots below and follow links
https://www.nhs.uk/Services/gp/Overview/DefaultView.aspx?id=38304 and
https://www.nhs.uk/Services/GP/Overview/DefaultView.aspx?id=36174 for further information.





Bluntisham should therefore not be categorised alongside Alconbury and Great Staughton because it does not share the same level of GP provision and no patients travel into Bluntisham for their care.

Indeed, this issue is highlighted in a letter dated 17th Jan 2018 written by NHS England to Hunts District Council in regard to planning application 17/00906/OUT (BL1) which states:

"There is one GP branch surgery within a 2 km radius of the proposed development, 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."

On Wednesday I quoted from this document and attach it to this email for your reference.

Please confirm that this email will be read and acknowledged as part of our statements in regard to Matter 11.

Many thanks.

Kind regards,

Chris Dunn
On behalf of the Colne Road Action Group

Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Email address: kerryharding@nhs.net
Telephone Number – 0113 824 9111

Your Ref: 17/00906/OUT
Our Ref: NHSE/HUNT/17/00906/KH

Planning Services
Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon, PE29 3TN

17 January 2018

Dear Sirs,

Outline planning application for residential development of up to 135 dwellings and additional parking for St. Helen's Primary School, including vehicular access, public open space, pedestrian links, car parking, drainage, and other associated works. Land West of Longacres, Colne Road, Bluntisham.

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating Cambridgeshire and Peterborough Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 135 residential dwellings, which is likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 GP branch surgery within a 2km radius of the proposed development, 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. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

5. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity, in line with CCG estates strategy, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.

6. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to increase capacity and range of services at the existing facility. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

7. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.

8. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

9. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Huntingdonshire District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

[redacted]

Kerry Harding
Head of Estates