A meeting of the **DEVELOPMENT MANAGEMENT COMMITTEE** will be held in **THE CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, PE29 3TN** on **MONDAY, 20 OCTOBER 2025** at **7:00 PM** and you are requested to attend for the transaction of the following business:-

AGENDA

PLEASE NOTE THE ORDER OF THE AGENDA MAY CHANGE

APOLOGIES

1. MINUTES (Pages 5 - 8)

To approve as a correct record the Minutes of the meeting held on 15th September 2025.

2. MEMBERS' INTERESTS

To receive from Members declarations as to disclosable pecuniary, other registerable and non-registerable interests in relation to any Agenda item. See Notes below.

3. DEVELOPMENT MANAGEMENT - OTHER APPLICATION

To consider a report by the Planning Service Manager (Development Management).

(a) Houghton and Wyton - 23/00627/OUT (Pages 9 - 342)

Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works - Land Between Houghton Grange and The How, Houghton Road, Houghton.

4. APPLICATION REQUIRING REFERENCE TO DEVELOPMENT MANAGEMENT COMMITTEE

To consider a report by the Planning Service Manager (Development Management).

(a) Hemingford Abbots - 25/01248/FUL (Pages 343 - 506)

Change of use from dwelling (Use Class C3) & agricultural land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking - Hemingford Park, Common Lane, Hemingford Abbots.

LATE REPRESENTATIONS

10 day of October 2025

Michelle Sacks

Chief Executive and Head of Paid Service

Disclosable Pecuniary Interests and other Registrable and Non-Registrable Interests

Further information on Disclosable Pecuniary Interests and other Registerable and Non-Registerable Interests is available in the Council's Constitution

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Please contact Anthony Roberts, Democratic Services, Tel: 01480 388015 / email Anthony.Roberts@huntingdonshire.gov.uk if you have a general query on any Agenda Item, wish to tender your apologies for absence from the meeting, or would like information on any decision taken by the Committee.

Specific enquiries with regard to items on the Agenda should be directed towards the Contact Officer.

Members of the public are welcome to attend this meeting as observers except during consideration of confidential or exempt items of business.

Agenda and enclosures can be viewed on the District Council's website.

Emergency Procedure

In the event of the fire alarm being sounded and on the instruction of the Meeting Administrator, all attendees are requested to vacate the building via the closest emergency exit.

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HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the DEVELOPMENT MANAGEMENT COMMITTEE held in THE CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, PE29 3TN on Monday, 15 September 2025

PRESENT: Councillor D L Mickelburgh – Chair.

Councillors R J Brereton, E R Butler, S J Corney, D B Dew, P A Jordan, S R McAdam, S Mokbul, B M Pitt, T D Sanderson, C H Tevlin and S Wakeford.

APOLOGIES: Apologies for absence from the meeting were submitted on behalf of Councillors J Clarke, K P Gulson, J Neish and R A Slade.

23 MINUTES

The Minutes of the meeting of the Committee held on 18th August 2025 were approved as a correct record and signed by the Chair.

24 MEMBERS' INTERESTS

Councillor D Mickelburgh declared a Non-Registrable Interest in Minute No 25 by virtue of the fact that the application related to the Ward she represents.

25 APPLICATION REQUIRING REFERENCE TO THE DEVELOPMENT MANAGEMENT COMMITTEE - CHANGE OF USE FROM DWELLING (USE CLASS C3) & AGRICULTURAL LAND TO A WELLNESS CENTRE (CLASS E) AND WEDDING AND EVENTS VENUE (SUI GENERIS) WITH GUEST SLEEPING ACCOMMODATION AND PARKING - HEMINGFORD PARK, COMMON LANE, HEMINGFORD ABBOTS - 25/01248/FUL

Following receipt of further information relating to the application, it was

RESOLVED

that the application be not determined.

26 APPLICATIONS REQUIRING REFERENCE TO DEVELOPMENT MANAGEMENT COMMITTEE

The Planning Service Manager (Development Management) submitted reports (copies of which are appended in the Minute Book) on applications for development to be determined by the Committee. Members were advised of further representations, which had been received since the reports had been prepared. Whereupon, it was

RESOLVED

a) Variation of Conditions 1 (Permitted Use), 6 (Access Time Frame and Removal of Condition 2 (5 Year Limit) of 18/00840/FUL - Legacy Park, Chatteris Road, Somersham - 25/00972/S73

(M Hargreaves, Agent, addressed the Committee on the application).

that the application be approved subject to conditions to be determined by the Planning Service Manager (Development Management) to include those listed in paragraph 8 of the report now submitted.

b) Removal of Conditions 1 (5 Year Time Limit), 5 (Permanent Pitches), 6 (90 Days), 7 (Transient Pitches) and Variation of Condition 10 (Access) of 23/02358/FUL - Legacy Park, Chatteris Road, Somersham - 25/00973/S73

(F Adams, Applicant, addressed the Committee on the application).

that the application be approved subject to conditions to be determined by the Planning Service Manager (Development Management) to include those listed in paragraph 8 of the report now submitted.

27 PLANNING SERVICES PEER REVIEW ACTION PLAN

The Committee received and noted a report by Change Programme Lead – Planning Services to which was appended a detailed account of progress against the Planning Services Peer Review Action Plan. A copy of the report is appended in the Minute Book.

Members commented on the action to revise the Scheme of Delegation and the introduction of smarter ways of working. Reference also was made to the need to improve attendance by Members at meetings of the Local Plans Advisory Group.

The Committee then discussed support for Members at appeals. While it was accepted that Officers could not create reasons for refusing an application where the recommendation had been to approve it, Officers were able to provide advice. Other Planning Authorities were adopting approaches to supporting Members during appeals. It was agreed that a training session would be held on this subject.

In response to a question about backlog applications, Members were informed that significant progress had been made in this respect and that the service was on track to achieve its target. An update also was provided on staffing.

Following a further question about pre-application advice, the Committee was advised that the service was successful but some aspects of it required improvement and so it was being reviewed.

Having suggested that some of the language used in the Action Plan should be formalised, it was

RESOLVED

that the report be received and noted.

28 APPEAL DECISIONS

The Committee received and noted a report by the Planning Service Manager (Development Management), which contained details of three recent decisions by the Planning Inspectorate. A copy of the report is appended in the Minute Book.

RESOLVED

that the contents of the report be noted.

Chair

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DEVELOPMENT MANAGEMENT COMMITTEE 20th OCTOBER 2025

Case No: 23/00627/OUT (Outline Planning Application)

Proposal: Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

Location: Land between Houghton Grange and The How, Houghton Road, Houghton

Applicant: Homes England

Grid Ref: (E) 529919 (N) 272039

Date of Registration: 6th April 2023

Parish: Houghton and Wyton

RECOMMENDATION - POWERS DELEGATED to the Head of Planning, Infrastructure & Public Protection to APPROVE subject to conditions and completion of a Section 106 obligation.

OR

REFUSE in the event that the obligation referred to above has not been completed and the Applicant is unwilling to agree to an extended period for determination, or on the grounds that the Applicant is unwilling to complete the obligation necessary to make the development acceptable.

This application is referred to the Development Management Committee (DMC) as the S106 contributions associated with the development if approved would amount to more than £100,000.00

and the Officer recommendation is contrary to the recommendation of the Parish Council.

It should be noted that this is a supplementary report to DMC following the meeting held on 21 July 2025. It should be read in conjunction with the report to that meeting, which is appended.

This application has been brought back to DMC for a fresh determination of the application. A legal issue was raised in relation to the previous resolution on the application (see below). For the avoidance of any doubt as to that issue, this supplementary report has been provided, and the application is to be determined afresh.

1. RELEVANT BACKGROUND

1.1 This supplementary report provides clarification in relation to the quantum of development sought by the outline planning application, to ensure there is no doubt as to whether members fully understand the nature of the application.

1.2 The application was before DMC at its meeting on the 21 July 2025 when a resolution was passed. However, because of the legal issue raised, the application has been brought back to DMC to be considered afresh.

1.3 Officers' recommendation on the application remain as per the 21 July 2025 DMC officer report, which is appended.

2. CONSULTATIONS / CORRESPONDANCE (SINCE THE LAST REPORT)

2.1 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 30.09.2025) – Comments received in respect of the interpretation of planning policy and that dwelling numbers should be reduced to 88 to make the application policy complaint and win the support of the Parish Council and neighbouring councils.

2.2 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 31.07.2025) – Comments received on behalf of Houghton and Wyton PC from Richard Buxton Solicitors which include a covering letter and full DMC transcript from 21 July 2025. The correspondence requests that the application is taken back to Committee as they consider an error was made that played a material role in the Member's decision and the rectification could result in a different decision being made.

2.3 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 29.08.2025) – Comments received express concerns regarding the recent decision made, noting that Houghton and Wyton Parish Council have employed Richard Buxton Solicitors to object to the decision made. The letter confirms the Town Council's support for Houghton and Wyton Parish Council in their objections to the application and proposed development. Previous comments on the application have been re-iterated by the Town Council and a request is made that public consultation be re-run on the application.

Officer comment in respect of comments and correspondence received: The comments received from both Houghton and Wyton Parish Council and St Ives Town Council do not raise new issues not already covered in the DMC officer report. Public consultation has already been run on a number of occasions and no new application information has been submitted since the last public consultation.

3. CLARIFICATION: QUANTUM OF DEVELOPMENT

3.1 The law provides that, where outline permission is granted for 'up to' a certain number of dwellings, this establishes that the principle of that number is acceptable. The Local Planning Authority cannot then refuse reserved matters approval on the basis that it wants to reduce the number of dwellings.

3.2 This is because, when considering reserved matters, the Council cannot refuse to approve reserved matters on grounds going to the principle of the development itself and which are already implicit in the grant of the outline permission. Instead, consideration is limited to the acceptability of the matters that have been reserved for consideration (in this application: access, appearance, landscaping, layout, and scale).

3.3 In granting outline planning permission in this instance, the Council would be acknowledging that the site can accommodate 120 dwellings. The quantum of development could not be further revisited and tested at reserved matters stage.

3.4 Whilst it would be open to Homes England or their successor developer to apply at reserved matters stage for fewer units, the principle of up to 120 dwellings would be established by the decision at outline stage. 120 dwellings is a quantum which, for the reasons set out in the appended report, is considered acceptable on this site.

4. RECOMMENDATION - POWERS DELEGATED to the Head of Planning, Infrastructure & Public Protection to APPROVE subject to conditions and completion of a Section 106 obligation:

- Submission of reserved matters (access, appearance, landscaping, layout and scale)
- Time limits (submission time limit; implementation time limit)
- Approved plans (site location plan and parameter plan)
- Amount - Not more than 120 dwellings
- Approved site principles as shown on parameter plan and conformity statement to be submitted with reserved matters (including justification of any minor variances)
- Phasing with reserved matters (for CIL)
- Finished floor and site levels to be submitted with reserved matters
- Materials to be submitted with reserved matters
- Details of Surface Water Drainage Scheme to be submitted with reserved matters
- Details of surface water run off during construction - pre-commencement submission
- Surface water drainage system completion report
- Details of foul water drainage scheme to be submitted with reserved matters
- Land contamination assessment (phase 2), remediation strategy and any unexpected contamination
- Construction Environmental Management Plan (CEMP) - pre-commencement submission
- Highways - Layout, siting visibility splays, parking provision, turning and loading areas to be submitted with reserved matters
- Road construction, management and maintenance details – slab level submission
- Roads to binder course prior to occupation
- Temporary parking & turning facilities during construction
- Landscape and Ecological Management Plan to be submitted with reserved matters
- Details of ecological onsite signage with reserved matters
- Ecological enhancement/Biodiversity method statement with reserved matters
- Ecological surveys and mitigation with reserved matters
- Works during bird breeding season
- BNG metric to be submitted with reserved matters
- Tree survey, arboricultural method statement and tree protection plans with reserved matters
- Timescales for delivery of Houghton Road frontage tree planting buffer to be submitted with reserved matters

- Details of pedestrian and cycle links to adjacent sites (The How / The Spires) to be submitted with reserved matters
- Hard and soft landscaping details to be submitted as part of reserved matters
- Public Rights of Way scheme to be submitted with reserved matters
- External lighting details to be submitted with reserved matters
- Dwellings accord with M4(2) of the Building Regulations plus 9% M4(3) compliance as part of reserved matters
- Housing mix in accordance with LP25 as part of reserved matters
- Water efficiency (Building Regs doc G) compliance
- Details of bin stores to be submitted with reserved matters
- Details of cycle stores to be submitted with reserved matters
- Fire hydrants details – slab level submission
- Play equipment (LEAP and LAP), seating and bin details with reserved matters
- Noise assessment to be submitted with reserved matters
- Residential Welcome Pack prior to first occupation
- Installation of MOVA at the site access signal controlled junction with the A1123 prior to occupation (unless provided by Morris Homes in the meantime under S278 works) - slab level submission
- Details of broadband connection to be submitted with reserved matters
- Details of ELVC to be submitted with reserved matters

OR

REFUSE in the event that the obligation referred to above has not been completed and the Applicant is unwilling to agree to an extended period for determination, or on the grounds that the Applicant is unwilling to complete the obligation necessary to make the development acceptable.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

CONTACT OFFICER:

Enquiries about this report to **Laura Fisher, Senior Planning Officer (Strategic Team)** - email laura.fisher@huntingdonshire.gov.uk



Huntingdonshire DC Planning Department
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

[redacted]
C.C Councillor members of the Development Management Committee

Urgent please re Development Management Committee meeting on 20.10.25

[redacted]

Houghton Grange Phase 2 – Land Between Houghton Grange And The How Houghton Road Houghton ("the Site")
23/00627/OUT | Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

Following a review of the discussions which took place at the July Development Management Committee meeting, our lawyers identified that false and misleading information had been given to Councillors prior to them taking their decision. We informed you of this in our letter dated 31st July and are pleased that the council have now accepted this mistake and agreed to re-run the DMC again on the 20th October.

Whilst this is welcomed, we do of course still wish to draw your attention to the detailed concerns we also raised regarding written conclusions in the report produced prior to the July DMC, and which we believe mistakenly recommended councillors approve the scheme without further amendments.

The concerns we have in respect of interpretation of planning policy are real and therefore we would strongly urge the council to seek independent legal advice now before issuing a new report for the DMC meeting to be held on the 20th October.



We appreciate that the council wishes to manage its costs and reduce un-necessary exposure to the risk of appeals and litigation. Consequently, the last thing the Parish Council wishes to do is Judicial Review and overturn a decision at the expense of the District Council.

This is especially the case when we believe using your guidance and legal advice, Homes England could be advised to make relatively small amendments to the scheme (most notably by reducing dwelling numbers to 88 and thereby the housing density more in line with village and not town edge of settlements) to make the application both policy compliant and actually win the support of the Parish Council and neighbouring councils.

By seeking this advice now, Councillors would be able to make a more informed decision, and we believe ensuring the scheme is built out in a way which compliments Houghton Grange Phase 1 and the unanimous wishes of the wider community.

In addition to saving tax payers money, we believe this course of action would ultimately result in houses being built on the site much more quickly.

Yours sincerely,

[redacted]

[redacted] Parish Clerk,
On behalf of Houghton & Wyton Parish Council
Cc: Houghton & Wyton Parish Councillors

RICHARD BUXTON
solicitors
environmental • planning • public law
[redacted]

Huntingdonshire District Council
Planning Development Control
Pathfinder House
St Mary's Street
Huntingdon PE29 3TN

Our ref: HOU1/2/LPF
Your ref: 23/00627/OUT

18th July 2025

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: laura.fisher@huntingdonshire.gov.uk
Copies to: james.croucher@huntingdonshire.gov.uk &
developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

RE: Houghton Grange Phase 2 – Land Between Houghton Grange And The How Houghton Road Houghton ("the Site")

23/00627/OUT | Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works ("the Application")

1. We are instructed by Houghton & Wyton Parish Council and write following the publication of the Officer's Report ("**the OR**") on 9 July 2025.

2. This letter is intended to supplement our previous objections to this Application, and we do not intend to replicate the points made within it. However, we want to draw to Members attention the irrational and unlawful way in which the Officer Report has addressed one of our key concerns. The fact this letter focuses on that principal issue does not negate the other issues raised in our objection and we would ask Members to give those concerns significant weight to support refusal.

3. It would assist to firstly re-set out our key concern about the quantum of development and the associated policy conflict that arises from the unnecessary over-development of the Application Site. We will then explain how the Officer Report has unlawfully approached the issue.

The Key Concern: the overdevelopment of the Site

4. The Parish Council have long made it clear that they are not against the in-principle development of the Site for housing of up to 88 dwellings. We recognise that the Site is allocated in the Local Plan Policy SI 1. However, we are strongly against the over-development of the Site to provide an extra 32 houses (or 120 in total). This is not a technical breach of policy: given the sensitive nature of the Application Site the over-development carries real world planning harm which we will outline below.

5. The starting point is the interpretation of Policy SI 1 which allocated the larger 'St Ives West' Site for approximately 400 homes. There are three important elements of the policy we wish to highlight.

6. The first is the allocation of the entire wider allocation site ('**the Allocation**') for approximately 400 homes. It is right that the supporting text to Section D Allocations notes that there is a 10% tolerance either side of the approximate figure (i.e., up to 40). But critically the supporting text at D9 goes onto note "*All housing capacities should be design-led"*.

7. The relevance of this is reflected in parts a and b of SI 1:

    a. *completion of a detailed master planning exercise to be agreed with the Council*

    b. design codes or conceptual appearance of development proposals

8. The point being that SI 1 envisaged and intended that the housing capacity of the wider St Ives West Site would be identified through a design-led detailed masterplan process which spread the housing across the wider Allocation in a joined-up and coherent manner.

9. What SI 1 did not envisage – and cannot be interpreted as allowing – is that the 10% tolerance would be viewed as allowing for 440 homes on the Allocation regardless of their distribution thus allowing for one part of the Allocation to be overdeveloped with the entire tolerance placed there.

10. However, this is exactly what has occurred. The failure – still unexplained – of the Council to require a joined up detailed masterplan approach across the Allocation (as required by the Policy) has led to other elements of the wider Site coming forward without regard to what would be proposed on the rest of the Site.

11. But this failure does not justify the Applicant concentrating housing on the last remaining part of the Allocation (BBSRC Field) to 'max out' the numerical tolerance of 440. This is contrary to the design led approach required (per D9), the required detailed master planning and design code approach (SI 1 a and b), and contrary to the sensitive approach to development enshrined in SI 1 as recognised by the supporting text at 11.3.

12. The second relevant element of SI 1 is the requirement for any development to maintain separation between settlements and thus ensure there is anti-coalescence. This is enshrined at SI 1 g:

> *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires*

13. Given the layout of the Allocation the separation between Houghton Grange (which sits at the westernmost portion of Allocation adjacent to Houghton and Wyton village) and The Spires (which sits at the easternmost portion of the Allocation next to St Ives) can only be interpreted as being a requirement to maintain the separation between those two settlements.

14. This is consistent with Policy HWNP3 – Anti-coalescence of the Neighbourhood Plan which requires that:

Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements or would lead to their coalescence.

15. The supporting text to this Policy makes clear at 5.28 and 5.29 that while the BBSRC Field is at the heart of the area essential to ensuring anti-coalescence, it was also recognised that the area was allocated (and would be allocated in the emerging local plan) and so a balance would have to be achieved.

16. The point being that the Neighbourhood Plan was aware of allocation SI 1, and the Local Plan was clearly aware of Policy HWNP3 (given it pre-dated it), and the need to strike a balance. Requirement g of Policy SI 1 is the striking of that balance. A point underscored by the fact that Section D sets out in a policy box at D.3 that any allocation does not guarantee permission will be granted and any proposal will have to satisfy "*any relevant policies in a 'made' neighbourhood plan covering the site area*".

17. Policy SI 1 g and HWNP3 are entirely consistent and are aimed at achieving the same goal: the preservation of the separation between Houghton and Wyton and St Ives. This is confirmed by the Examiner's Report into the Local Plan which noted at 7.9 that S1 1 g provides "*sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected*".

18. The third relevant element of Policy SI 1 – which underlines and supports the second element – is the recognition that different parts of the Allocation will form part of either St Ives or Houghton and Wyton:

Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications

Emphasis Added

19. The point being that it is not the case that policy envisages that the entirety of the Allocation would become part of St Ives. Instead, it recognised – due to the complex nature of it – that western parts would become part of the Built-Up Area of Houghton and Wyton and eastern parts would become part of St Ives. This is consistent with policy HWNP1 which incorporated the Houghton Grange Site into the built-up area of the Village and so would naturally encompass the adjacent BBSRC Field (i.e this Application Site).

20. To gain support from Policy SI 1 (and the policies of the Neighbourhood Plan which are consistent with it) any development of the Allocation would have to sustainably spread housing across the Allocation in a joined up master planned and design led way which maintained the separation between the two settlements.

21. What it does not allow is what is proposed here: which is the over-development of the Application Site by maximising the numerical tolerance of the wider allocation to concentrate housing on the most sensitive part of the allocation. Such an approach is in fundamental conflict with Policy SI 1.

22. This has real world planning consequences.

23. Firstly – as set out in Mr Radmall's Separation Report and reiterated in his 2025 LVA Appraisal – the overdevelopment of the Application Site erodes the critical separation between Houghton and St. Ives. The simple point being that the more houses that are placed on the last remaining part of the allocation between the settlements the more the gap is eroded. While 88 homes strikes the balance envisaged by the Neighbourhood Plan, the increase by a third to 120 does not.

24. As set out by Mr Radmall the increased bulge of development – shown on the Parameters Plan – reduces the gap by two-thirds and sub-urbanises the peripheral and transitional character of the gap.

25. Secondly, the increase in housing leads to an associated increase in the density of housing. The density of the Application Site would – with the additional housing – be at 36dph. This is entirely out of character with the village itself and Houghton Grange Phase 1 (which is at 16 dph), and with the wider approach taken by the Council for edge of small village settlements which seeks a density of 25 dph. This is reflected in numerous documents produced by the Council as part of the recent Local Plan call for Sites such as the New Local Plan Land Availability Assessment Sept 2024.

26. Thirdly, the increase in housing above what is sustainable removes land which could be used for vital village community infrastructure such as a second LEAP or MUGA, and generates additional traffic further stressing junctions of the A1123 which are already over capacity.

27. Finally, it is critical to note that there is no commercial imperative for delivering high density development in this location. There is no suggestion the Scheme would be unviable at 88 dwellings and so it is unclear what rationale exists for maximising housing on this above in a manner so contrary to the Local Plan and Neighbourhood Plan.

28. **In short the 36dph is a fundamental and unjustified departure from the approach to housing in this part of the district. It is unnecessary to provide a fair return to Homes England. It smacks of greed at the expense of the local community and the residents who will be affected.**

Concern with how this is dealt with in the Officer Report.

29. We advised officers of our intent to raise legal issues that could form the basis for a judicial review.

30. We have significant concerns with the way in which Officers have attempted to circumvent these issues in the Officer Report.

31. The Report deals with the interpretation and accordance with Policy S1 at the 'Principle of Development' sub-heading.

32. At 7.22 – 7.23 the Officer concludes that the Application accords with SI 1 through reliance on the 10% tolerance. But the Officer, while partially quoting from D8 at 7.22, does not quote the requirement that housing capacities should be "*design-led*" and instead treats the 440 as an acceptable maximum for the Site which justifies any level of housing under it.

33. That is plainly a misinterpretation of policy as it fails to recognise that Policy SI 1 required any housing figure to be design-led via the envisaged master planning and design code

stages, and any number would have to be spread sustainably across the entire allocation rather than provided through the overdevelopment of one part. As a consequence the Application does not comply with Policy SI 1 even through it provides for housing under the numerical ceiling of the 440 figure.

34. This point is then missed in the Officer's Report at 7.25 where the Officer deals with the – unexplained – lack of adherence to criteria a and b. The significance of these requirements is they illustrate the need for a joined-up approach to the Allocation which is lacking and the failure to accord with this element of the policy cannot justify over-developing one area of the allocation simply because it is the last opportunity to do so.

35. At 7.28 – 7.29 the Officer Report alleges that there is a tension between HWNP3 and the Local Plan. This is entirely wrong and irrational. It is an attempt by Officers to circumvent the clear conflict that arises from SI 1 g and HWNP3 which are consistent in seeking a separation be achieved between Houghton and St Ives.

36. As set out above while the policies use different language (the Neighbourhood Plan referencing Houghton and St Ives vs the Local Plan referencing Houghton Grange and The Spires) they are clearly both concerned with protecting the same separation as Houghton Grange is on the Houghton side of the allocation and The Spires on the St Ives side. This straightforward and common-sense interpretation is confirmed by the Examiner's Report into the Local Plan which noted this policy would "*provide a sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected"*.

37. Members should be particularly concerned about the attempt by the Council to circumvent the conflict that arises from SI 1 g and HWNP3 by misinterpreting the former and dismissing the latter on the basis of a policy tension that does not exist. This reflects the fact that the Application – due to its overdevelopment – is eroding the separation between these settlements and such conflict is weighty enough to justify refusal.

38. Linked to this point is the Officer Report's reliance on the Council's Landscape Consultant to dismiss the expert findings of Mr Radmall. We would ask Members reach their own view reading both experts Reports but raise a particular concern about how the Council's Landscape Consultant's view is predicated on the mistaken belief that the entire allocation forms part of St Ives (see 7.62 of Officer Report for an example).

39. This is simply not the case either on the ground or in policy terms. In policy terms Policy SI 1 made clear that it intended that the western part of the allocation (i.e Houghton Grange and the Application Site) form part of Houghton and Wyton village and the eastern part form part of St Ives. This is why the SI 1 made clear the built-up areas would form the "*the built-up areas of St Ives or Houghton and Wyton as appropriate"* and the Neighbourhood Plan considered Houghton Grange as part of the village.

40. This is then supported by the physical reality on the ground. Houghton Grange Phase 1 and the BBSRC Field historically formed part of the Houghton Grange estate and the topography and surroundings of BBSRC Field have more in common with Phase 1 than the Spires/St Ives.

41. The above is also why the Officer's response at 7.87 in relation to our density concern is misconceived. The Officer relies on using an edge of town density, but that fails to recognise that in policy terms and physically on the ground the Application is next to Phase 1 (with its 16 dph) and on the edge of a village (with 25 dph).

42. The Officer Report repeats the points raised above again in dealing with the Parish Council's concerns under 'Other Matters' (see for e.g., 7.341; 7.349; 7.378). We will not repeat our response which remains the same.

43. But at various points the Officer relies on the indicative illustration which is included with Policy SI 1 to argue it is broadly simply to the masterplan submitted with the Application. Our main response would be such a high-level broad plan cannot lend support especially when it was envisaged it would be followed by detailed master planning that never occurred. But even if reliance could be place, it would not support the Application. The Application does not align with it as housing has been placed along the road, and squeezed much more into the gap of open space. This is a result of Homes England over-developing the Site.

44. Overall, the Officer Report – in finding that the Application would accord with Policy SI 1 and overlooking the breach with the Neighbourhood Plan – has misinterpreted and misapplied policy in a manner which is unlawful.

Conclusion

45. The Parish Council is not against housing development at this allocated Site. But we are against the overdevelopment of the Site. The heart of the issue is that Homes England have taken an indicative numerical maximum and applied is as a threshold under which any level of housing would be acceptable. But that is simply not correct.

46. Policy SI 1 – read in the context of the introductory paragraphs of Chapter 9 – required a comprehensive master planned approach which spread housing across the wider allocation in a design-led approach. The fact this did not happen previously should not and cannot justify cramming the final part of this allocation with almost as much housing as the numerical maximum would allow by increasing the housing by a third from 88 to 120.

47. The ramification of such an approach is an Application which in its current form is contrary to Policy SI 1 generally, and also causes specific harm through the erosion of the separation between Houghton and Wyton and St Ives which is protected by SI 1 g and HWNP3 and through an out of character density which is far in excess of the adjoining Phase 1 development and village.

48. This is not a technical breach of policy – it causes real world planning issues and given the centrality of Policy SI 1, its' breach renders the Application contrary to the development plan as a whole. On that basis – regardless of the tilted balance – Members should refuse permission. The titled balance doesn't justify development which is contrary to the development and the allocation policy which establishes the principle of development.

49. We would therefore ask Members to refuse permission. Our objections raise other matters which are also weighty but in this letter we wanted to focus our attention on the main issue especially given the unlawful way it is addressed in the Officer Report.

[redacted]

MEETING TRANSCRIPT

23/00627/OUT - Land between Houghton Grange
and The How, Houghton Road, Houghton

In attendance at meeting on: 21st July 2025

Councillors:
[redacted]

Officers:
Laura Fisher (Senior Planning Officer), Jez Tuttle (Cambridgeshire CC Highways Transport Assessment Team), Michelle Bolger (Council's Landscape Consultant), Officer 1, Legal Officer

Speakers:
[redacted]

Speaker	Transcription	Para
Chair	Development Management Section 186 agreement to consider reports by the Planning Service Manager. And this item is Houghton and Wyton and will be presented to us by our Senior Planning Officer, Laura Fisher.	1.
Laura Fischer	Thank you, Chair. Good evening, Members. Could I just – so Jez, you've just come in, haven't you? Would you be able to join us up at the table? Thank you. There we go.	2.
M1	[redacted].	3.
Laura Fisher	Thank you all. So this evening we are joined by Jez Tuttle from the Cambridgeshire County Council Highways Transport Assessment team and Michelle Bolger, the Council's Landscape Consultant, who has joined us remotely. Now we have had late reps on this item, which I'll run through first. The late representations on behalf of Houghton and Wyton Parish Council were received on Friday after the normal deadline for late representations, so only an oral update is made here. Members are asked to read the representations contained in the letter from Richard Buxton Solicitors dated 18th July 2025. If Members have not had an opportunity to read these representations, time can be given during this meeting. Although the representations have been made late, they are before Members and represent a material consideration. The representations seek to supplement previous objections by Houghton and Wyton Parish Council and re-emphasise their key concern as to the quantum of development and the associated policy conflict from what the Parish Council considers to be the unnecessary overdevelopment of the site. Officers consider that this key concern has been appropriately dealt with in the Officer report and policy SI1 has not been misinterpreted. The relevant section of the Officer report is section 7 and paragraphs 7.13 to 7.70 in particular, which deal with the principle of development and landscape and visual matters. Members are invited to consider this section in the context of the Officer report, which should be read as a whole. Policy SI1 provides for an allocation of approximately 400 homes. The	4.

	supporting text to Local Plan section D states that a 10% tolerance either side of the approximate figure is considered to be reasonable. The proposal here would result in a number of units in that 10% tolerance. The supporting text of the Local Plan at D.8 goes on to say that all housing capacities should be design-led and where a scheme proposes a number outside this variance, that should be justified through the design and access statement. Paragraph 7.25 of the Officer report addresses each of the requirements of criteria A to I in policy SI1 in turn. For criterions A and B, the Officer report explains why there is no detailed masterplan nor design codes in the circumstances here. The design of the proposal is also dealt with at paragraphs 7.71 to 7.102 of the Officer report, including its density, concluding that the design of this outline scheme is acceptable. As for part G of SI1, the Officer report draws on the views of its external Landscape and Visual Consultant Ms Bolger, to conclude that the proposal would maintain a sense of separation. As noted, Ms Bolger is present at this meeting. The tension between policy Houghton and Wyton Neighbourhood Plan 3 and policy SI1 referred to in the Officer report at paragraph 7.29 refers broadly to the fact that the Neighbourhood Plan contained a policy aimed at anti-coalescence, whilst approximately 400 units were allocated to the west of St Ives in the more recent Local Plan. The Officer report goes on to conclude that the proposal would be in accordance with policy SI1. Overall, although the late representation should be considered, they carry little weight and Officers do not consider that they change the overall planning balance and recommendations in the report. Can we just double check that everybody has had a chance to read these late representations around the table? A show of hands. That's great. Thank you. Right, so this application is for up to 120 dwellings on land between Houghton Grange and The How, situated to the eastern edge within the Parish of Houghton and Wyton and to the west of the town of St Ives, located to the south of Houghton Road, the A1123. This plan shows the boundaries of the respective parishes in the immediate locality. The Slepe Meadows housing development, Garner Drive, is located to the north, whilst to the west is a residential Houghton Grange development phase 1 being built out by Shelborne Estates. To the east is The How development and The Spires, which was land formerly part of the golf course. The site is accessed by a main pedestrian and vehicular access known as Edith Coote Drive directly from Houghton Road opposite Garner Drive, which serves the existing phase 1. The Thicket footpath is located to the south of the site, beyond which is the River Great Ouse floodplain and the settlement of Hemingford Abbots and Hemingford Grey. The aerial image shows the extent of the adjacent Barratt Homes, The How and the Shelborne Homes developments, which all form part of St Ives West. The site has a number of listed buildings nearby. The southwestern part of the site is located within the Houghton and Wyton Conservation Area, and the St Ives and Hemingfords Conservation Areas are located adjacent to the boundary of the site to the south and southeast. Part of the site, to the south of Houghton Grange, is a County Wildlife Site and there is a public right of way in the southwest section of the site. There's a number of trees around the edge and a group within the centre that are subject to a Tree Preservation Order. So this application is made in outline form with all matters reserved, for the construction of up to 120 homes with public open space, landscaping, play	

areas, surface water attenuation, roads, car parking, pedestrian and cycle routes and associated works. The site forms part of St Ives West under the SI1 allocation within the Local Plan for approximately 400 homes. As noted, there's a 10% tolerance within the Local Plan in respect of residential capacity. 305 homes already have the benefit of planning approval and the majority of these have already been delivered. The proposals result in a number of units within this tolerance and will complete the wider site allocations.

The parameter plan here illustrates the background context and key elements of the development for approval. It includes key site constraints which includes the water mains, foul water routes and their associated easements, the existing Houghton Grange masterplan with its consented Suds pond, vehicular access, existing and consented cycle and pedestrian routes and retained trees.

It illustrates the developable area of the site for residential use alongside seeking an in-principle approval for a number of detailed elements that would inform future site layout, including open spaces and trees, pedestrian and cycle routes as well as building heights and densities. As shown, the width of the gap between the edge of the proposed built development and The How access road varies in width. At the northern end it is approximately 145m wide. It narrows to between 115 to 131 in the centre and towards the southeast it ranges from 136 to 165m wide.

So the illustrative masterplan is shown here, but this is purely for illustration how the development of the site could accommodate up to 120 dwellings. As noted within the Officer report, the HDC Urban Design Officer has confirmed that the general layout could be made acceptable for reserved matters applications.

Now, St Ives West allocation calls for approximately 23ha of on-site green space. The supporting text to the allocation sets out that the southern part of the allocation should comprise a substantial area of publicly accessible green space to reinforce the strategic green corridor along the river. This application will deliver 16.8ha of strategic green space meeting that. In total, over 26ha of green space is provided across SI1, exceeding the policy requirements.

The top right-hand plan on this slide shows an indicative illustration taken from the Local Plan of how the allocation could be achieved. As confirmed in the Officer report, if permission is granted for development, the area of strategic green land will be offered for transfer to the District Council. This piece of land provides the link between Berman Park, The How and Thicket Wood, which is already in HDC control. This land is a significant benefit to the scheme and part of the strategic aim for the Council.

Now, as set out in paragraph 3.9 of the report, there are a number of policies within the Houghton and Wyton Neighbourhood Plan that are considered to have been superseded by the St Ives West site allocation. Members, as you are aware, we are in tilted balance and this site is also allocated for development under allocation SI1. As set out in the report, policy SI1 is afforded significant weight in the determination of this planning application.

Now a number of objections have been received in relation to these proposals from both residents and parish and town Councils. One of the key objections raised relates to landscaping concerns and Houghton and Wyton Parish Council have appointed their own Landscape Officer. Full copies of their reports received are within the Officer report. The Council has therefore engaged an independent Landscape Consultant, Ms Bolger, who has provided advice and full copies of these are also enclosed in the report.

Ms Bolger has confirmed that the land – sorry, has confirmed that the submitted LVA provides a fair assessment of the landscape and visual effects of the

	development and on this basis Officers consider the submitted LVA is acceptable and that the landscape and visual impacts of the proposed development are not considered to be significantly adverse and that there is a clear separation between the developments at Houghton Grange and The Spires, in accordance with the SI1 site allocation. A number of objections have also been received in relation to highways matters, in particular congestion along the A1123 Houghton Road. Trips generated from this site have been reviewed by the Local Highway Authority Transport Assessment team who also model the strategic road impacts of sites allocated in the Local Plan. The Highways DM team along with the TA team at the County have raised no objections to the proposals subject to conditions. Objections have also been received in relation to flooding and drainage. The majority of the site is located within an area at the lowest risk of flooding, flood zone 1, and is therefore acceptable in principle. The LLFA have fully reviewed the proposals and confirmed there are no objections. A number of comments have also raised concerns with regard to density. Based upon the number of dwellings shown on the illustrative masterplan, the overall total based upon 120 dwellings would achieve an average density of 31.4 dwellings/ha. A detailed exercise has been undertaken by the HDC Urban Design Officer, as set out in paragraph 7.82 to 7.88 of the Officer report, which concludes that the proposal does not result in overdevelopment and does reflect an appropriate density that has regard to the wider character and adjacent developments. Okay, so St Ives West is a large-scale major development and as such the proposals are eligible to pay Section 106 contributions in addition to CIL. The range of contributions are set out in section 7.320 of the report and shown on this slide. There will also be CIL receipts in the order of £1.1 million, and as Houghton and Wyton Parish have an Adopted Neighbourhood Plan, 25% of CIL receipts will go to the Parish which will be approximately £270,000. Now following a query raised at Section 106 Advisory Committee, the Thicket Path to the south of the site is unregistered land, as confirmed by the Cambridgeshire County Council Definitive Maps Officer. In respect of the contribution towards primary school education, over £1.5 million has been requested by Cambridgeshire County Council. St Ives West in its entirety was forecast to generate the requirement of an additional 1FE of primary education provision of which individual developments have been expected to contribute towards the cost of this additional capacity based on the size of their scheme. Thorndown Primary School is the catchment area – sorry, is the catchment school for the developments within St Ives West, as shown on this slide. I've annotated the application site in yellow. Now, an expansion project came forward in advance of funding from developer contributions as agreed back in 2012 to allow the infrastructure to be in place to minimise the impact of the development. And just running through the photos, so these are some site photos taken along Houghton Road looking south and looking west. These are some views looking east and west along Houghton Road. We've got a view here from Slepe Meadows, the Garner Drive development, looking south with the highways infrastructure already in place. This is looking south and west as you enter Edith Coote Drive and looking north from Edith Coote Drive towards Slepe Meadows. This is some of the existing frontage planting along Houghton Road and a view from the corner of plot 12 at The How development, looking west across the application site. You can just see the water tower in the distance there. Now, this is from the southeast corner of the site where a pedestrian link is shown on the	

	parameter plan to connect into the Thicket. These are views going into the Shelbourne Development and the view down what will be the woodland walk secured under the Houghton Grange phase 1 development. And these are views from within Houghton Grange phase 1 where the parameter plan shows pedestrian links into the woodland walk as part of the current proposals. The determination of this application must be made in accordance with the Development Plan unless material considerations indicate otherwise. As the Council is unable to demonstrate a five-year housing land supply, the presumption in favour of sustainable development is applied for decision taking in accordance with paragraph 11D and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as the tilted balance. Whilst no five-year housing land supply can be demonstrated, the Local Plan policies concerned with the supply and location of housing are considered to be out of date and can no longer be afforded full weight in the determination of applications. Allocation policy SI1 can, however, still be afforded significant weight. A balancing exercise should be carried out to determine whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF 2024 taken as a whole. Now in terms of the social dimension of sustainable development, the site appears to have no significant constraints and is deliverable. It would also increase the supply of housing, contributing up to 120 homes towards housing supply on an allocated site. The proposal will also result in the delivery of 40% affordable homes. In terms of the economic dimension, the proposal would contribute towards job creation during the construction phase and in the longer term through additional population. In terms of the environmental dimension, the proposal offers the potential for energy efficiency measures as well as the delivery of a net gain in biodiversity. The proposals will also deliver a significant extension to the publicly accessible Berman Park, the country park secured on the former golf course, to connect the site to St Ives and formalising the sense of the space and public access to the south. Financial contributions will be secured to support local infrastructure. There will be less than substantial harm to two Conservation Areas, the Grade II listed building and its curtilage listed gatehouse, with the harm in each case being at the lower end of the scale. Substantial harm has been identified to one non-designated heritage asset, _____ ridge and furrow, which must be taken into account when applying a balanced judgment. Although considerable importance and weight must be given to the statutory duties under the Planning Listed Buildings and Conservation Areas Act, applying section 16 of the NPPF, the heritage harm here, both individually and cumulatively, would be outweighed by the public benefits as set out in the report. The visual and landscape impacts of the proposed development are not considered to be significantly adverse, and it is considered that a clear sense of separation is maintained between the developments at Houghton Grange and The Spires. The proposals are in accordance with policy SI1 of the Adopted Local Plan and applying paragraph 11 of the NPPF, the identified harm would not significantly and demonstrably outweigh the identified benefits when assessed against the NPPF taken as a whole.	

	Therefore, having fully assessed all three objectives of sustainable development, it is considered the collective material benefits firmly outweigh the identified harm. Applying section 38(6) of the Planning and Compulsory Purchase Act, the proposed development is in accordance with the Development Plan and there are no material considerations which indicate that permission should be refused. It is therefore recommended that Members delegate powers to approve the application in line with the recommendation, subject to conditions and the completion of a Section 106 agreement, as set out at section 8 of the Officer report. Thank you, Chair.	
Chair	Thank you very much. We will now hear from Cllr [redacted] who will report to us the S106 Advisory Committee's findings.	5.
Cllr [redacted]	Thank you. The Advisory Group considered the proposed development of up to 120 homes at Houghton Road, Houghton and the associated Section 106 obligations. Members agreed the requested contributions have been properly explored with consultees and were appropriate, necessary and met the statutory test to make the development acceptable. The Group supported a package of measures, including 40% affordable housing, contributions to early years and primary education, local health facilities, libraries, formal outdoor sports provision and the substantial public open space included with the scheme which exceeds policy requirements. Members felt these obligations addressed the impacts of the development and would help it integrate effectively into the local community and infrastructure. The Advisory Group therefore supported the application and recommended the Section 106 package to the Development Management Committee.	6.
Chair	Thank you very much. We will now move on to the section where we have our speakers. Our first speaker for this item is Houghton and Wyton Parish Council and they have [redacted] speaking on their behalf. Thank you for joining us this evening and you have three minutes in which to address the Committee.	7.
[redacted]	Good evening, Members. The Parish Council is not against any development, but they are against overdevelopment and the overdevelopment of this site by a third, turning 88 homes to become 120, that's an extra 32 dwellings, is not a technical breach nor a pedantic point. It creates a clear policy conflict which carries actual planning harm and that requires refusal. Policy SI1, numerically in isolation can be read as allowing up to 440 homes across the wider allocation – not this site, the wider allocation – but fundamentally, it is not a threshold under which any level of housing is okay. It is not interpreted in that binary fashion. It instead, what policy requires is a design-led approach to determine a number, through a joined-up masterplan and design code across the whole allocation. That hasn't happened here previously. And what the past failure, which is recognised in the Officer report, cannot justify is then overdeveloping the final part of this allocation to, as it were, make up the numbers. Why not? Well, it's not design-led, first of all, but critically, it leads to policy conflict with criterion G of SI1 and also the Neighbourhood Plan policy 3, the anti-coalescence policy. It is an important part of these policies that there is a separation between the village and the town of St Ives. And this site forms a crucial part of that gap which, Members, you will know having visited, is perceived currently as present but narrow. And the quite simple point is, the more you cram on, the less separation exists and a third more level of housing has a material adverse impact on that separation. If I may, the Officer report and the Officer respectfully is wrong to suggest there's a tension. I'd just ask you to read paragraphs 15 and 17 of the Richard Buxton letter that addresses why there is no tension. The real-world harm of the separation being degraded is then aggravated by the stark contrast from this application in terms of density. 32 we're told for this	8.

	application against 16 in Houghton Grange phase 1. The Council's landscape expert is wrong, if I may say, to describe the site as already being more akin to St Ives. Policy doesn't reflect that, but treating it as such shows that already the damage is being done and if this application is allowed, it will become part of St Ives contrary to policy. I've got one second left, so I'll say this. The application breaches policy SI1. It is a policy which you have to give significant weight to and it means that the application is contrary to the Development Plan as a whole and therefore you are directed to refuse it. If there are any questions, I've counted through that with the three minutes and I'd be very willing to answer them. Thank you.	
Chair	Thank you very much. So if we have any questions for this particular speaker? Do any Councillors have any questions? Cllr [redacted].	9.
Cllr [redacted]	Thank you. Just on the point you opened with, and thank you for coming before us tonight and well done for cramming that into three minutes, the point you opened with around the 400 figure and you allowed that policy can be read as to interpret a 10% tolerance, just to be clear in our minds, I think, and obviously your lawyers' letter discussed this as well, is there dispute about the point of interpretation that a 10% threshold exists and therefore 440 can be read within that tolerance in the proposal before us and the objection is about not having arrived at the particular 440 homes with a masterplan and in the planned way you've described, or is there an additional dispute about the additional 10% figure being relevant? Just conscious that you were quoting a figure of 88 and then 120. So just so we could be clear what you are and aren't saying about the 10% tolerance and how we should read the relevant policy, I think would be really helpful for us.	10.
[redacted]	Absolutely, thank you very much, Councillor. Yes, it is our case that the Officers are currently misinterpreting the policy and the misinterpretation is in interpreting the 10% as allowing you carte blanche to go up to any number up to 440. I made that point of it – interpreting it as if it is, as it were, mechanistic, a binary yes or no, up to 440 you're fine, beyond which that's when we need to look into whether you're good with the policy. That is an incorrect interpretation. What it misses, and Members if I may just give you the reference to it, is the Officer report quotes partly from the supporting text which is at the start of chapter 9, quotes partly from D8, but misses the critical part of D8 because D8, paragraph D8, of the Local Plan goes, "a 10% tolerance either side of the approximate figure set out is considered to be reasonable. All housing capacity should be design-led." So the point of interpretation is you don't start with the figure, you start with the design-led approach that is required across the allocation, reflected in the masterplan and the design code requirement that was part of the policy. I appreciate it wasn't followed through, but that embeds the issue, it doesn't forgive it. So to I hope answer it in the clearest way possible, the 440 figure is a bit of a red herring and it shouldn't be treated as, as it were, a threshold. The question should be, is this figure design-led? Has it spread up to a maximum of 440, but you can't go beyond that, across the allocation in a sustainable way? And we say it hasn't done that because you've not had this masterplan approach, you've not had this design-led approach. This is the last allocation you've got or last site in the allocation you've got and the developers are cramming housing onto it as much as they can get. That's why we say we're not against development of this site, it's the overdevelopment. I hope I've pithily answered the question as best I can.	11.
Chair	Cllr [redacted], did you have a follow-up to that?	12.
Cllr [redacted]	If I may, thank you. So just to be clear in the argument you've unpacked for us there then, are you suggesting to us that design-led – I mean that condition is clearly carrying a lot of weight in your interpretation, so your suggestion is that design-led should be interpreted to mean with a masterplan and as set out as	13.

	opposed to a more generic phrase.	
[redacted]	Yes, that's the way in which when you read – because case law tells us you need to read policy as a whole, supporting text can help inform what's in the policy box. In the policy box, you've got a requirement for a masterplan and a design code. Why? Well, one reason is the supporting text tells us housing numbers should be design-led. So I think that's a very long way of saying yes to your question, if that makes sense.	14.
Chair	Thank you. Cllr [redacted].	15.
Cllr [redacted]	Thank you, Chair. I'll try and be brief on this one as well. It's just going back to your question – your mentioning of the it's not a technical breach. Am I relaying that in the fact that you're talking about the density factor, that the density which is 31.4 in my calculations or actually in here, and you're saying that's not the technical breach, it's just the led breach. So in other words, 31.4 isn't a technical breach of density.	16.
[redacted]	No. It's my fault, as it were, trying – using overly, as it were, barrister-like language. What I mean by that is, sometimes, I'm sure you're very familiar with, objectors can raise a whole scattershot amount of points, and sometimes they technically breach a small part of the policy, but it doesn't really affect the planning merits overall and the material considerations and the weight to be given. What I meant by this isn't just – this is not a technical breach is, we're not just, as it were, relying on language and being able to show there's a conflict on the words of it. It reflects a material, actual conflict with the whole purpose of the policy. It goes to the heart of the policy. And that's why we say, that's why we focused in these three minutes on it as, as it were, one of our big points. To use it in language – sometimes when you take challenges to the High Court, they can refuse to quash a decision if the decision would have been the same regardless. We're not in that sort of circumstance here in terms of this just being a point that won't make a difference to your conclusions. If we're right on this, then it means that the central important policy, the allocation policy, is not accorded with, it's conflicted with, and that renders the proposal contrary to the Development Plan as a whole. So it's my problem in the language I used, I apologise for that, but I hope I've explained what I mean by that.	17.
Chair	Thank you very much. Are there any other Councillors that have a question for this particular speaker? There are no other questions, so thank you very much for joining us this evening.	18.
[redacted]	Chair, thank you very much for allowing me to go over my time by ten seconds and thank you, Members for, hearing me out. Thank you.	19.
Chair	Thank you. Our next speaker on this particular item is Cllr [redacted] from Hemingford Abbots. Welcome, and you have three minutes.	20.
Cllr [redacted]	Thank you. Good evening and thank you for allowing me to speak. Hemingford Abbots Parish Council has significant concerns regarding this planning application. This development is not in accordance with HDC's Local Plan. The Plan acknowledged development on the site, but not on the scale and size contained in this application. The resulting loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to rather than away from the A1123. We are particularly concerned about the increase in number of residential units, should be 88, now to be 120, and the potential effects on the local infrastructure and the high density of housing near the entrance from the 1123 which is significantly higher than in any neighbouring area. Further, we believe the spirit of the planning system is being tested in this case. Is this planning application about creating an attractive and integrated space, design led, or just maximising numbers and leaving a negative legacy for the community who have to live with the consequences of the overbuild? Finally, we are also concerned for the credibility and effectiveness of the Local and Neighbourhood Plans. If this application is allowed to progress in its latest form, despite the clear breaches with local rules and consistent opposition from several neighbouring parishes, then a signal is being sent that local democracy	21.

	is impotent and easily disregarded. Thank you.	
Chair	Thank you very much. Are there any questions for this particular speaker? There are no questions, so thank you for joining us this evening.	22.
Cllr [redacted]	Thank you.	23.
Chair	Our next speaker on this particular item is Cllr [redacted] from St Ives Town Council. You can.	24.
Cllr Wells	– Wells, Chair of St Ives Town Council Planning Committee. The Town Council has recommended refusal of the application on the following grounds. Firstly, overdevelopment, and you'll pardon me if you've heard these figures before. The plan for 120 homes exceeds the recommended Local Plan allocation of 88 homes by 36%. This is significantly greater than the density of homes in Houghton Grange phase 1 and even exceeds the density of homes in the St Ives Spires Estate. It's interesting that the size and the shape of the area for development appears to substantially exceed that that you see in the current version of the Local Plan. The actual shape of the development seems to have bulged out to the south and east. This brings increasing risk of coalescence between St Ives town and the village of Houghton, impacting the character of both settlements. Secondly, impact on highways. The A1123 is already subject to heavy traffic and queuing in peak periods, and this development will add to the low proportion – to the number of houses allowed within the scheme. Bear in mind that there are no known proposals which would reduce the volume of traffic on the A1123. The proposals in the A141 and St Ives improvement study would not mitigate traffic flows between St Ives, Houghton and Huntingdon. The St Ives element of this study is not related to improvements to the road network and so will have no effect on the road. St Ives Town Council therefore urges Members of the Committee to reject this application as it is proposed. Thank you.	25.
Chair	Thank you very much, Cllr [redacted]. Are there any questions for this particular speaker? Cllr Gulson.	26.
Cllr [redacted]	Hello Cllr [redacted]. You say there's a difference in the shape and size of the development from previous. Can you enlighten us as to what amount that would be, please?	27.
Cllr [redacted]	So, I mean the – there is a page actually which is in your agenda papers where you will see that the shape of the Houghton Grange phase 2 development is a kind of a – well, it's obviously a trapezium but you have a tilt to the north outwards, expanding out to the north and expanding to the southeast and corners. It's difficult for me to be precise without actually displaying that particular page of the agenda papers, but you'll see that in the actual implementation, that southerly and eastern corner seems to have bulged out more into the surrounding land which is indicated on the current version of the Local Plan as being green space. I hope that's sufficiently clear. As I say, without looking at the actual original diagram, it's a bit hard to be clear on that.	28.
Cllr [redacted]	Yeah, thank you. If I may come back. What I'll try and do is see if I can get clarification of the Officer. Thank you.	29.
Cllr [redacted]	Thank you.	30.
Chair	Okay. So we'll bring that to our Planning Officer in our questions for them. So we'll move on to our next speaker. Our next speaker is Cllr [redacted] and he is the Ward Member for Houghton and Wyton. So welcome very – welcome, and when you're ready you have three minutes in which to address the Committee.	31.
Cllr [redacted]	Chair, Members, Officers, as said already, we don't disagree that development should happen on this site. The community and the Parish Council have all accepted that. The question before you is the scale and the harm that it will have on our pride of place. The current outline application proposes 120 dwellings. Officers have advised that this falls within the 10% flexibility in site allocation numbers. Those allocated	32.

	sites are The Spires, The How, Houghton Grange phase 1, and this one, phase 2. But this interpretation deserves careful scrutiny, as the Parish Council has highlighted. The Local Plan has a 10% tolerance applied to the capacity for each spatial planning area. However, did this envisage putting the entire 10% toleration in one part of the allocation, thus leading to overdevelopment of a single, and most would say, the most sensitive site of all? Would anyone have seen that as being the intention? The allocation was intended to be design-led, coordinated through a masterplan. While we have a sketched masterplan submitted with this application, surely a comprehensive, joined-up masterplan across the entire allocation was required. Instead, we are presented with an application that concentrates all of the excess growth in the single, final, most sensitive site. And this is an important field. It sits closest to the settlement edge of Houghton, within its visual and physical setting. Our Local Plan and the Parish Neighbourhood Plan are both clear in seeking to protect the separation between St Ives and Houghton and to guide development in a way that respects community identity and rural character. These policies are entirely consistent and are aimed at achieving the same goal: the preservation of the separation between Houghton and Wyton, and St Ives. This application represents a density increase from 16 dwellings/ha in phase 1 to over 31 in this phase, doubling the intensity in precisely the area where lower density would be expected. It's reasonable to expect less housing at the edge of the village, not more, surely. And perhaps most importantly, I believe there is no commercial need for delivering 120 houses. The scheme would be viable at 88 dwellings. So the question is not whether the development is acceptable, it is. The question is whether the additional 32 houses are supported by policy, needed for viability or consistent with the settlement context. Of all three counts, based on the arguments presented, I believe the answer is no. Can I just sum up? This perspective is not solely that of the Parish Council and its advisors, it's also the clear outcome of extensive public consultation, reflects unanimous opinion with neighbouring town and parish councils and associated groups, plus our local MP. Given there is no support for this application, for the sake of local democracy and sound planning, I ask you to reject it and ask for a revised scheme.	
Chair	Thank you very much, Cllr [redacted]. Are there any questions for this particular speaker? Cllr [redacted].	33.
Cllr [redacted]	Good evening, [redacted], good to hear you this evening. I'm going to draw Members' attention to paragraph 7.23, because it does, and I think you tried to sort of, David, as you spoke, Cllr Keane, spoke, you did try and sort of argue against that. But 120 dwellings would still fall within the 10% tolerance referred to in the Local Plan because it would then bring the allocation, the allocation is 400, which I'm looking at page 194 of the Local Plan, and it's pretty clear, that's what it states. So it would then bring the total number across the allocation to 425 which is clearly less than the 440 and less than the 10% tolerance on that. But you seem to be suggesting that we can't look at the Local Plan, the SI1, we just have to look at this application in isolation which I don't think is realistic, if I may say so.	34.
Cllr [redacted]	I think, and there are far more experienced people in this room, but as I understand it, Councillor, each of the sites within the allocation, I would say would have 10%, but we're putting all of them in the last site. And as I said, it's the most sensitive and important site I think for the whole pride-of-place look for this development. So that's what I was trying to say.	35.

Cllr [redacted]	Well, I expect everybody would say that. They would say their site is the most sensitive. It is a lovely part of our district, I agree, but your argument is this should somehow be an exception to the Local Plan?	36.
Cllr [redacted]	No, I'm not saying it should be an exception. What I'm saying is it's the edge of settlement, it's between St Ives and Houghton, you would expect there to be less density on the last bit of a settlement, not more density. By doing what you're doing, you're increasing the density. You're going from 16 in the phase 1 to almost 32 in phase 2. So how does that make an edge of settlement? So that's the point I'm trying to make.	37.
Chair	Thank you very much. Cllr [redacted]	38.
Cllr [redacted]	Thank you and thanks for coming before us, Cllr [redacted], and as you've drawn attention, you're here as a Ward Representative as opposed to a planning expert. So with that in mind, I sort of seek to catch this fairly broadly, but would it be right to understand from your remarks that you feel that because there demonstrably wasn't a masterplan here prior to any of the development of the linked sites, that it wouldn't be possible to bring forward a proposal in the circumstances we're in now? I'm just trying to understand how significant the point you're flagging about the lack of masterplan is in your mind. And I'll ask the second question separately I think for simplicity, please, Chair.	39.
Chair	Thank you.	40.
Cllr [redacted]	Well, I think in hindsight, we all wish there was a more detailed masterplan across the whole of the four allocated sites. I think, you know, we talk a lot about pride of place all the time and obviously the nature of our community, etc, etc. But I think it's clear in the Neighbourhood Plan and in the Local Plan we're looking to stop us getting an urban sprawl from one end of Huntingdon to the other end of St Ives. Nobody wants that. And I think if we had a masterplan, a design-led masterplan, then that would have helped. On this particular one, I think we've said, the Parish Council has said, you know, they're not against development on this site. They understand it. They were very supportive of phase 1, they worked very closely on that, and we've got sixteen houses, you know, per hectare. I think the question here is just the size of the – the amount of houses trying to be put into a very small space while trying to maintain some kind of gap, and even that I mean is questionable. Some would say it's a meaningless gap, but trying to do the balance between the two, I think that's what's caused this issue. But if there was a revised plan that was probably closer to the 88 that was in the original, then I'm sure that would be more supportive from the Parish Council and the community.	41.
Chair	Have you got a follow-up question, Cllr [redacted]?	42.
Cllr [redacted]	Thank you. I do, if I may. And a more basic one, but Cllr [redacted], you laboured particularly the views of local councils and democracy and referenced democratic decision-making. I just wonder if you'd agree that the planning process that we're making decisions in isn't, for better or ill, it's not a purely democratic one. It's is about interpreting the rules as set out and I just wondered if you'd like to sort of clarify that.	43.
Cllr [redacted]	I think tonight is a very good demonstration of interpretation of planning legislation and obviously the importance of this body in that sense. I mean, it's very clear, isn't it, that we have Officers who work very hard and advise us, but they have an interpretation of the legislation and obviously there's other people here who have a slightly different interpretation. And unfortunately, all of you here have to decide on which one you're going to pick. So, sorry, I'll leave that with you.	44.
Chair	Thank you very much. Cllr [redacted]	45.
Cllr [redacted]	Thank you, Chair. I just wanted to come back on something that you mentioned to Cllr [redacted] earlier and it was a little bit fuzzed in my mind, which does not usually happen to be honest. It was actually – you talked about the four phases, and you might want to remind the rest of the panel what the four phases were, but equally you talked about the total of those phases and how this one	46.

	particularly impacts on the others through the numbers and the capacity of this last site which we are looking at individually because it's – this is the one before us, as to how that you see as impacts and makes a difference compared to the others and the overall scheme, if that makes sense.	
Cllr [redacted]	I'll try and answer the question. I'm a bit fuzzy too, now. So, yeah, just to reiterate and, you know, it's very clear that we've got the St Ives side of this equation, which is The How and then The Spires, and then we've got the Houghton and Wyton side of the equation, which is phase 1 which is already under development and this one which is directly in front of you. So we are talking about two village, town, so that's that situation. Two on one side of the village, two on the other side of the town. In between is a gap that's supposed to be meaningful. I think every time I drive down the A1123 and I go past that space, at the moment it's meaningful. It looks like I'm leaving Houghton and I'm going into St Ives. I believe this development with a density of 32 in that space, that close to the road, with that size of gap, will mean you won't feel like you're leaving Houghton anymore and you're going into St Ives or vice versa. You'll think you're just going through some kind of, you know, sprawl from St Ives into the next area. I would say it's a bit like, and sorry for Members at Hartford, you know, it's that when you come into Huntingdon, you know, have you got into a different village or are you in just another part of Huntingdon? And we want to make – I think the Local Plan clearly states that we want to keep these things separate. We want to make people feel that they're in separate communities, because it's very important to the pride of place that we're trying to achieve.	47.
Chair	Thank you very much. Are there any other Councillors with questions of clarification for this particular speaker? No, there are not. So thank you very much for coming. We now have another Ward Member, Cllr [redacted], who I believe is on Zoom with us.	48.
Cllr [redacted]	I normally would be, as you know, because I'm a member of the panel, but unfortunately I've had a medical procedure recently, so I'm prohibited from travelling and sitting in a meeting for a few hours. Anyway, I'll get down to the point on this. I mean, following on from what my Ward Colleague has said and also the other speakers, my main issue on this has and always remains the fact that from the beginning of this development, the St Ives West as it's called, which actually, you know, has always included a large part of Houghton and Wyton, there's always been the desire to keep a substantial gap. The gap between the two communities needs to remain to actually give the impression, as Cllr [redacted] has already said, you are leaving one community and going to another. If you look at the figures that we were given earlier about the various gaps between it, at the narrowest point, which is the pinch point, it's 115m. That is, to put it in context that you and I and others can think of, that is the length of a football pitch. You know, if you're travelling in a community and there's a football pitch, you don't suddenly feel you've left one community and joined another. So the gap is very, very tight there and always has been. My desire on the site has always been to follow the non-coalescence wording and I actually think what's proposed here actually closes that gap substantially. Following on from that, with the fact that we are trying to play catch-up, what we're trying to do with these four sites is, and I accept the 10% tolerance, but what we're trying to do is pick up on the underperformance of the others in the 10% and lump it all into this one site, which as other people have already said, does actually mean that we're sitting here now with something that looks very much the edge of an urban sprawl rather than the start of a village, which is what we were really trying to achieve with this. I don't think that the current plan with 120 houses or so is workable to achieve what we were looking for in the first place, both as a local community and as a	49.

	Council, when we put our plans together. And I appreciate the fact that, you know, being a member of the panel, that, you know, we've got an option here. One option we can't have is say, oh we accept it but it's got to be 88 houses. It's either acceptable at 120 or it's not. And I would urge Members to look at it and say, within our policies, there are various bits and pieces to take into account, but the 120 is definitely picking up the sins of the other sites in their lack of the 10% and catching up. So I'll leave it there for now because I think I've made it quite clear where we are. You know, anti-coalescence, we're not leaving a substantial gap. I would suggest there's no gap at all if you leave a width of a football field. And also the fact that we're trying to pick up all the extra houses on one patch at the end of the day. Quite happy to take questions and thank you for listening to me.	
Chair	Thank you. Are there any questions of clarification for Cllr [redacted]? No, there are no questions. So thank you very much for joining us this evening.	50.
Cllr [redacted]	Thank you very much, everybody.	51.
Chair	I will move on to our next speaker which is [redacted]. Welcome. And when you're ready, if you just press the middle button and the light will go red at the top of your microphone and you have three minutes in which to speak.	52.
Chris [redacted]th	Thank you very much. My name is [redacted]. [redacted] and I'm here on behalf of concerned residents. We're not NIMBYs, as you hear. Since the Local Plan was approved, we've never opposed the principle of housing development on this site. We've supported the Parish Council through the planning process to ensure they represent us and our views, that they follow the planning policies and most notably this anti-coalescence policy that protects the different identities of a rural village and the town of St Ives and to ensure that this development complements phase 1 which was excellently done. As local residents, we've supported the Parish Council's appointments of professional advisors, landscape assessors, architects, lawyers, barristers, and supported the associated expenditure as well. We were very disappointed and shocked by the tone and the content of the Officer's report recommending approval of this application. This report appears to undermine our Neighbourhood Plan and suggests that it is now suddenly, somehow, in conflict with the Local Plan. This is an assertion that's never been put forward before in the 2+ years since this planning application was submitted, nor in the six years since the plan's own creation. The two plans were created in synchronicity with full knowledge of each other in harmony and not in conflict. And this sudden new change of view seems to us is an irrational and inaccurate connivance that this governing Committee should not tolerate. It appears as a desperate attempt to ignore what is good and agreed policy, clearly stated. Our Neighbourhood Plan was endorsed by two national inspectors and a rigorous inspection process. It's part of the development framework alongside the Local Plan. The policies of both documents reference the importance of the gap. They are not there to drive coalescence by pushing the envelope on this sensitive last remaining parcel. Each plan defines carefully the very same location of the gap, in words and in the case of the Local Plan by an illustration as well. We simply ask for this to be followed more precisely and not ignored. For over 10 years, this has been a story of David and Goliath, with the District Council losing an entirely unnecessary yet famous and expensive case in the High Court. This preceded our current Neighbourhood Plan which was agreed through thorough representation. We sincerely hope we will not have any more unnecessary, expensive and potentially also famous wastes of taxpayers' money defending the agreed Local Plans against such a desperate and unnecessary attempt to undermine them. This should not be the outcome while HDC exists as	53.

	an entity and the Development Management Committee still allows you as Councillors –	
Chair	_____.	54.
Chris [redacted]	Half a sentence, that's all, if that's all right.	55.
Chair	Yes, that's fine.	56.
Chris [redacted]	While the HDC still exists as an entity and the Development Management Committee still allows you as Councillors to have a final say on contested planning applications, then you have the power and responsibility to protect this village and market town as we know them. I plead with you to make this decision yours and your Committee's lasting legacy and exercise your independent judgment by recommending a refusal.	57.
Chair	Thank you very much. Are there any questions of clarification for this particular speaker? Cllr [redacted].	58.
Cllr [redacted]	Thank you very much for coming to see us. What is your view on tilted balance? Because you didn't mention it at all in your remarks. You were sort of suggesting that somehow we're just disregarding the Neighbourhood Plan which I don't think we are in this case. Do you not think that that is a factor in determining this application, because that was in the Officer's report and paragraph 11D of the NPPF clearly outlines why that is so significant?	59.
Chris [redacted]	Well, I'm just here as a citizen, a parishioner, a customer, I'm not an expert or a service provider, but yes, it's definitely a factor, isn't it? The Local Plan must be considered. There is an illustration and there were good words which describe what this gap is. They appear in the Local Plan and in the Neighbourhood Plan and it seems that that is very much changed in comparison to this application, so therefore those bits are somewhat being ignored.	60.
Cllr [redacted]	I didn't quite hear your last – could you just speak a bit closer to the mic, thank you. I couldn't hear the last one.	61.
Chris [redacted]	So we have an illustration in the Local Plan and we have good words in the Local Plan and in the other plan. They both fit together. It draws the outline of this proposed development and that's very different in the application. The application has changed that outline, so it seems that that drawing is being ignored.	62.
Chair	Thank you. Are there any other Councillors that have a question for this particular speaker? No, there are no other questions. So thank you very much for joining us this evening.	63.
Chris [redacted]	Thank you.	64.
Chair	I will move on to the last speaker for this particular application, and that is Jim Strike, who is the agent. Welcome. And you have three minutes in which to address the Committee. If you just press the middle button.	65.
[redacted]	Chair and Members of the Committee, thank you for the opportunity to speak on behalf of this application. I'm [redacted] from AECOM, Planning Agent for Homes England, the government's housing and regeneration agency. Homes England is an arm's-length body with a remit to increase housing delivery. They work with partners across the country to increase the delivery of new homes where they're needed, in accordance with adopted local planning policy. Homes England have procured Houghton Grange to deliver new homes to meet pressing local need, including the need for affordable properties. The phase 2 application is a natural progression of the successful phase 1, where Shelbourne Estates are building 100 new homes of which over 70 are completed. The proposals before the Committee today are design-led. The proposals strike a balance between making efficient use of land to deliver high-quality new homes, while sensitively responding to the character of the site and its setting. As well as the 120 homes of which 48 will be affordable, over 17ha of newly accessible public green space will be provided, offering substantial recreational opportunities for local people and considerable scope for wildlife enhancements along the River Great Ouse Valley. Attractive and convenient off-road pedestrian and cycle connections will be provided, linking to existing communities and wider networks. A substantial area of green space will be retained on the eastern side of the site, providing a meaningful break between neighbouring developments.	66.

	The housing area is just under 4ha, less than a fifth of the site area. Housing densities will average 31 dwellings/ha, but no more than 23 dwellings/ha closest to Houghton Road. The location and extent of the new housing area has been carefully designed to minimise the townscape and landscape impact, taking account of stakeholder comments. The proposals accord with the Development Plan and take account of the relevant policies of the Local Plan, Neighbourhood Plan and supplementary planning policy. Specifically, the proposals comply with strategic allocation SI1, St Ives West. Design quality is embedded in everything that Homes England does. The agency uses building leases to ensure high standards of design are actually delivered, as seen on Houghton Grange phase 1. This proposal represents responsible, design-led and plan-led development that meets policy requirements and delivers lasting benefits for existing communities and future residents. I respectfully ask the Committee to approve this application. Thank you.	
Chair	Thank you very much. Are there any Councillors that have any questions? Cllr Wakeford, then Cllr [redacted]	67.
Cllr [redacted]	If you'll forgive me again, Chair, and if the mic holds up, I have two questions. My – thank you for coming before us. My first question is really where you ended, if I may. You've described this as a design-led development. You'll have heard in discussion, I think, that there's been suggestion that we shouldn't see this as being design-led in the language in our policies as a result of the lack of original masterplan behind it. I just wonder if you'd like to comment for us on the extent to which you feel we should or shouldn't correctly see this as a design-led application and sort of what that means to you and what you think we should hear from you on that.	68.
[redacted]	Yeah. So the company I work for is a masterplanning company, so we take design very seriously in everything that we do and Homes England as our client does as well, as I've touched on. So I think the important point to make is that this isn't just a numbers game. What we've tried to do is come up with a development scheme here which makes efficient use of land, delivering the number of homes which is desperately needed locally, but in a way which mitigates any of the potential harm that there might be in terms of landscape impact, townscape impact, keeping a degree of separation between Houghton Grange and The Spires, which is a specific requirement of the allocation. And the scheme has evolved over a considerable period of time where we've listened to stakeholders, we've responded to those comments where we can and come up with a scheme which has been sort of developed and finessed over a number of iterations. I think we're now on version 9 of the parameter plan which reflects the fact that the scheme has evolved and responded to issues that have been raised. And in that sense, I certainly think it is a design-led scheme, sensitively trying to accommodate an appropriate number of homes to meet that very pressing local need.	69.
Chair	And you have a follow-up question, Cllr [redacted]?	70.
Cllr [redacted]	I do. Thank you for that. My second question was on a point you referenced in passing in your first answer as well. It's about the gap, the separation between the two communities which you'll know various policies have sought to retain and you've obviously heard this evening, which I suspect you didn't need to, but you heard this evening again that that is felt strongly by local residents as well. I just wonder if you'd like to comment for us on the extent to which you feel that there might be harm to that loss of separation, but the harm might be unavoidable or necessary or reasonable, or to what extent is it your case to us that there isn't a harm in the undermining of the separation and that we shouldn't see that there is. So, you know, is there harm and there's defence for it or isn't there? Or any comments you'd like to make about the separation, please.	71.
[redacted]	I think that the degree of separation that we have now with the gap on the	72.

	eastern side of the site is certainly adequate in terms of dealing with that point of anti-coalescence. And we've specifically pulled that – made that gap wider, as you'll appreciate, to the north and south, and to the north it's particularly important obviously in terms of the relationship with Houghton Road which is where quite a lot of that perception of coalescence will be experienced by people passing up and down Houghton Road. So I think that we have addressed successfully that issue of dealing with anti-coalescence.	
Chair	Thank you very much. Cllr [redacted].	73.
Cllr [redacted]	Thank you, Chair. I just want to go back a couple of things, because you've got the benefit in some aspect of we're looking at an outline planning application, so we don't have the details of what's where and when, etc, just a rough guide, shall we say, so there's a little bit there. It's just when you mentioned it's not a numbers game, I'm just trying to ascertain from a resident's perspective, because that's the thing that sort of they've been utilising, is that we seem to have a density factor of about just under 32, 31.4. But you're saying you're adjusting that throughout so it doesn't look so dense at the front. And of course we can't see that because it's just an outline planning application, so I wondered if you could give any indications, I suppose, as to how you could alleviate those concerns that you've heard from some of the speakers tonight already. Thank you.	74.
[redacted]	Yeah, it's worth explaining that whilst it's an outline planning application, the parameter plan does fix a number of important elements of the scheme, absolutely. So that would be for instance the area of that housing development area, the edge of that, there's no room for that to move. So effectively, that is, you know, that is defining where the housing development will happen. And similarly, one of the iterations of the parameter plan was to introduce that lower density closest to Houghton Road, so that's fixed. So the area effectively to the north of the access road and I think to the east as well, it's shown on the parameter plan that the housing densities in that area cannot be more than 23 dwellings/ha. So there is a lower density element of the scheme and that's to try and ensure that this scheme has a sort of village feel in its relationship with Houghton Road. And similarly, there are areas of substantive planting between the housing area and Houghton Road that again are fixed on the parameter plan, so they have to happen in those locations. So whilst it's an outline application, there are important safeguards in terms of what we're seeking planning permission for to ensure that a housing developer can't come along and treat it as carte blanche. It's – you know, there are those important fixes that capture important elements of the scheme.	75.
Chair	Do you have a follow-up question?	76.
Cllr [redacted]	And just briefly to follow up because again, it's a concern that was raised and in their or my interpretation of their words, why we ended up cramming in, and that's my interpretation of what they've been saying, the additional housing into this smaller end plot.	77.
[redacted]	I mean, I think it's fair to say that the housing densities are absolutely reasonable and I think the analysis that the Officers have done looking at the housing densities of other schemes around bear that out. Part of the reason that the density is what it is, is because we've tried to ensure that a significant, you know, significant areas of open space are kept as open space. So effectively, you know, what we've done is to ensure that the housing development is delivered effectively and efficiently in a small part of the site. So effectively less than 4ha is the area where the housing is going, ensuring that four-fifths of the rest of the site is green space. So you know, I think, again, it's one of those elements that have been iterated over a period of time to come up with that solution, but that's all part of the sort of design-led approach to achieve effectively an optimal outcome in terms of housing delivery and the quality of the scheme and picking up those important points like anti-coalescence.	78.

Chair	Thank you very much. Are there any other Councillors? Cllr [redacted].	79.
Cllr [redacted]	Yeah, thank you. I've got a couple of questions. This might seem like an odd one, but why this site? It just seems like a bit of an – there's a lot of obstacles in the way. It's – there's a lot – it's very close to kind of key green and blue spaces. There are other places that would be easier to build on.	80.
[redacted]	I'd need to refer to Homes England for the rationale of acquiring the site. But I mean that is what Homes England do. They acquire surplus public sector land, I think it was in this case, with a view to repurposing it to deliver homes that are desperately, urgently required. And they acquired Houghton Grange obviously as part of that exercise. Phase 1 benefited from an outline planning permission to begin with, so that was brought forward relatively quickly. But the intention always was that there would be a phase 2 which would build on the phase 1 and I have to say the very successful phase 1, as I understand it. So it's a sustainable location, it's a good place for new housing and I think we've come up with a good proposal which we would ask the Committee to approve.	81.
Cllr [redacted]	Okay. Thank you. And when you talk about good, you talked about in terms of they sell well because they're close to rivers and lots of green spaces rather than in farmland or low-grade.	82.
[redacted]	No, no, no, I just mean it's a good place for housing development. It's a sustainable location. There's public transport, there's walking and cycling connections and so on and it's obviously a wonderful landscape setting. And it's a sensible location to try and deliver homes to meet that very pressing local need.	83.
Cllr [redacted]	Okay. Thank you. And then second question and you may not know the answer to this one, I might have to refer to Officers. There's a couple of restrictive covenants on that land. I'm just curious what they are.	84.
Jim [redacted]	I'm not familiar with the restrictive covenants. I know there are a number of easements associated with utilities infrastructure which crosses the site, but…	85.
Cllr [redacted]	Okay. I'll let Officers…	86.
Chair	Maybe we'll take that question in the Officers' section. Thank you. Are there any other questions for this particular speaker? There are no other questions. So thank you very much for joining us this evening. So, now we move on to questions of clarification for our Planning Officer. So, Cllr [redacted].	87.
Cllr [redacted]	I think this is just for comment. Cllr [redacted] mentioned about the shape and size differential. I'd just like to hear a comment from the Officer as to, was there a shape and size differential from what we see now? Thank you.	88.
Laura Fisher	Just to check, in terms of the Local Plan, illustrative in the Local Plan?	89.
Cllr [redacted]	Sorry, I didn't quite gather whether it was from the Local Plan, but certainly he was indicating on the north of the site there was a more of a bulge on this now to what it was originally.	90.
Laura Fisher	And I think that comes and it was up in the presentation earlier and we can get it back up there, there is an indicative form of development, a sketch, within the Local Plan as part of policy SI1 and that recognises – it says in here on paragraph 11.4 of the Local Plan – recognises both the opportunities and sensitivities of the site. The indicative illustration summarises detailed urban design work setting out how development of the area could take place. So it's one form of development that could take place. It is a slightly different shape. It is generally –it is similar though. It is showing some development in that area.	91.
Chair	Thank you very much. Are there any other questions? Cllr [redacted]	92.
Cllr [redacted]	Thank you, Chair. Can you just remind me on the – we've heard a lot about the density. What's the standard or what can you go up to on a – is it 40, 45 an hectare?	93.
Officer 1	Sorry, through you, Chair. The density itself, I mean, it's – I don't wish to dodge it too much or dodge it at all, it's – each application's on its merits, so in this particular case, as has been flagged up from the last speaker, the indicative plan or the – sorry, the parameters plan does show a variety of density across the site. Yes, in a more urban area that density would be significantly higher. But in	94.

	a rural area, that has to be assessed on the surrounding densities, the phase 1 for example, and the areas as a whole. It is felt by Officers that this proposed density on this parameters plan does suit that particular area. But to answer your question, Councillor, you can go higher than what's been proposed, but that would be in a different format, different area, such as more of an urban area rather than a rural area such as this nature.	
Chair	Thank you. Cllr [redacted].	95.
Cllr [redacted]	Thank you. One of the points of policy interpretation that came up in a couple of contributions we've heard this evening is around the existence or otherwise of conflict between the Neighbourhood Plan and between the Local Plan in terms of the objective of a boundary between the two areas of settlement. I appreciate there's a reference in the report which I don't have in front of me to give you the, forgive me, the paragraph reference. But there's reference in the report, I think you may have made reference to this in the additional remarks at the beginning in light of the legal letter, but I just wonder if the Officers would like to comment on the significance or otherwise of any conflict there to the coherence of the argument that's being recommended to us by Officers. I mean, sort of put crudely, if we didn't see there was necessarily a conflict, what does or doesn't that unpick in the advice that you've given us? Thank you.	96.
Laura Fisher	Thank you. Just going back to what I said as part of the late reps, so we did – the tension between the policy, Houghton and Wyton Neighbourhood Plan 3 and policy SI1 referred to in the Officer report at paragraph 7.29, that refers broadly to the fact that the Neighbourhood Plan contained a policy aimed at anti-coalescence whilst approximately 400 units were allocated to the west of St Ives in the more recent Local Plan that takes precedence over the Neighbourhood Plan.	97.
Chair	Thank you very much. Cllr [redacted]	98.
Cllr [redacted]	Thank you, Chair. I have two questions just coming back to paragraph 7.23 in the report and I think it was the first speaker, whose name escapes me, from the Parish Council seemed to suggest that this didn't apply. And Cllr [redacted] in his remarks was saying, well, yes, he's not saying that the Local Plan isn't relevant, but it shouldn't apply to this particular application in terms of this 10% tolerance. But it is pretty clear here it would be 425 homes and approximately 400 home allocation, so that would be obviously less than 440, so I just wondered if we could get clarification on that point. I don't know if you're planning to ask our Transport Consultant, Jez, over there to answer any questions, but I just wanted to put about the impact on the 1123 because the county are obviously saying that there won't be an impact here on the highway. But I believe that – I think it's the MOVA it's called, I'm not sure what that actually stands for, but that's connected to the traffic lights, isn't it, and making sure they're synced correctly so we don't have the sort of traffic jams that I know local residents will be concerned about. So I wonder if we could get clarification on those two points, please.	99.
Laura Fisher	So just in terms of the tolerance and this 10%, so this has been applied across the allocation. There's nothing in the allocation or the introductory text to section D that specifies how any numbers within the tolerance above that number set out in the allocation are distributed. So our position is that there's no policy basis for contending they can't all be in one section. And the acceptability or otherwise of the 10% tolerance is based on whether or not the design is acceptable. Obviously, the Officer report covers that the Urban Design Officer is content with the proposals. Have you got anything to add, Jez?	100.
Jez Tuttle	Good evening and through the Chair, the Transport Assessment Team and the Highways Development Management Team had some quite considerable amount of discussions about this site. Some modelling was undertaken to look at the junction to see whether it would work with the additional traffic, so – and the conclusion was whilst there will be an impact, it wouldn't actually take the junction over its actual theoretical capacity, although it meant that it would be above its – sorry, it wouldn't take its actual capacity, but it would be above its theoretical capacity at times during the peak hours. But the question is whether	101.

	we could raise an objection given that it would only be for short periods of time during the peak hours and the answer was no, we didn't feel we could because of the minimal impact. What we thought would be a good idea as well would be to put the MOVA system on the junction which doesn't exist at the moment. I can go into detail about the MOVA, but essentially what it does is it allocates green time to where it's needed rather than just having standard timings. So, you know, people are waiting while there's a red signal sort of, you know, green somewhere else and no one's coming. It's an intelligent system that reallocates the green time and what that will do is will actually bring the impact down to, you know, what we feel to be an acceptable level. And we've asked for a condition that prior to the occupation of any dwellings that MOVA system is put in.	
Chair	Thank you very much. And [redacted].	102.
[redacted]	Thank you, Chair, for indulging me again. I've got a couple, some of them are quite simple, you'll be pleased to know. First of all, it says, you know, in our pack up to 120 yet in 7.376 it says 120. Probably just a technical issue. The next one is if you could bring up if possible – we talked about the gap, not on the underground but in actually the real gap, and it talks about the difference in gaps and I know one of them is 145 because it mentions it in a paragraph, I just wondered what the narrowness of the gap was and where the other part of it was. So that's another question. I've got a couple more if I can or should I wait for those to be answered?	103.
Laura Fisher	We'll just find these and do them one at a time if that's okay, I'm going to get confused. Thank you. I will just clarify that this application is for up to 120, so yes, and that's in the application description. Here we go. So this is shown on the parameter plan and on these the dimensions are shown on the plan. So we've got – we don't have one that goes all the way across the front in terms of the green adjacent Houghton Road there, but there is existing landscaping along there at the moment and then it goes to 145m, 115, 130.9 and then in the corner there with The How development, 165.6 and 136m. So we had these dimensions added on this plan just to make it very clear on this parameter plan what this gap would actually entail.	104.
Chair	Do you have a follow-up question, Cllr [redacted]?	105.
Cllr [redacted]	Yeah, thank you. I'm back on? Yep. Thank you. That was very useful. I did remember some of them but not all of them. My additional one is the one that I think is to the crux of some of the matters on this one is on density, not my density, but the density of housing and it talks about in 7.82 about Houghton with Wyton Parish Council and the residents, blah, blah, blah, and the locality, but their concerns are on density. And you've put in here, however, Officers consider that the proposed density of development is in line with standard densities in common with market town developments. I wonder why we're using market town developments when it's actually more of a rural development, is one, because the next bit then goes on to the different densities and why are the edge of density in one of the many pages that you've written in this well-documented area here, it talks about 25 on the edge of developments which is where it might confuse myself with some of the other plans you've seen that I might not have read completely in depth on this one. And the last thing is when they talk about a flawed 10% allocation, I just wondered the view from Officers on the fact that if we look at this in isolation, we're talking about an original plan of 88 and now it's 120. When they're talking about the overall all the phases were 440, therefore the 10% wouldn't have been – it wouldn't have been up to that 10% figure, which is 440 I think and it doesn't come to that, if that makes sense. It almost did to myself when I thought about it.	106.
Laura Fisher	Okay. So I think the reference to 25 dwellings/he, that's picked up in some of the comments that were received from Houghton and Wyton Parish Council in terms	107.

	of the Local Plan that's going through at the moment, in that they were looking at 25 dwellings/ha on edges of villages. I think on edges of like market towns, it's 35, so this is why we've got these two different numbers in there making reference to different things. Sorry, can you just repeat the last bit of the question? Sorry.	
Cllr [redacted]	Was it reference to flawed 10% allocation? I wrote most of it down, but I can't read my own writing. Whether it counted for the whole of the site and whether – because we're looking at this as an individual aspect. They're talking about we're – the argument is that we're cramming from what was originally going to be 88 now to 120, but that's because it's taking all the additional 10% from all the four phases and ploughing it into one. That seemed to be the gist they seemed to be getting at at the moment on the amount of density within that particular area.	108.
Laura Fisher	Okay. So there is nothing within the Local Plan, there's no policy basis, rather, for contending you can't have in terms of this 10% just in this final section. Obviously, there's been – in terms of the planning history of this wider St Ives West as set out in the Officer report, the permissions were historic by the time the Local Plan was adopted, the developments had already come forward or had been given planning permission, so this is just the last sort of piece in the puzzle as such. And so yeah, we've applied the 10% across the allocation.	109.
Chair	Thank you very much. Cllr [redacted].	110.
Cllr [redacted]	Thank you, Chair. I think my question might be quite similar to Cllr [redacted] and if I put it in my own words, I may possibly elicit a different answer or not, I'm not sure. So first of all, just on the up to 120, can I – and the whole design-led approach questions around on that topic. Essentially, if this is approved this evening, are we acknowledging that the site can accommodate 120 homes or is it really up to 120 depending on further designs coming forward, but is there a presumption of 120 or is that really yet to be tested? And I've got another further question if that's okay.	111.
Laura Fisher	So that is yet to be tested. We would have to look at this at reserved matters stage in terms of all the reserved matters that would come through. So yeah, it's up to 120 and that would be assessed later if this… yeah.	112.
Cllr [redacted]	Thank you. That's really helpful. So essentially you're saying it's possible, but we haven't yet established it as fact. Okay. And then perhaps my other questions are slightly – carry less weight having established that, but I guess the 400 homes across the wider site, like there are a number of contributing factors to that, so one of them will be access and vehicle movements and my understanding would be that you can transfer some allocations across different parts of that wider site and still have the same impact on the main road. However, in terms of density of housing, clearly that has a more immediate effect on the immediate area. Can you give us any insight on the relationship of those different contributing factors in terms of the establishment of a 400? It may not be something we have here today. And then a similar – well, related question, so I'll roll it in together, if that's okay. The agent talked about the 23 dwellings/ha close to the road that's in the parameter plan. Apologies, maybe I should know this, but is the parameter plan actually part of this application and is it binding if this goes ahead today?	113.
Laura Fisher	Let me just pick that up then in terms of the density. So across St Ives West there's – there's different constraints across St Ives West. Up on The Spires there were lots of TPO trees, the same at The How. Houghton Grange phase 1, there is a lower density, but that's also due to TPO trees and landscape setting and we've got listed buildings up there as well. Now in terms of density on the plan that is up here now, the parameter plan, so if this application is approved, this would be the approved plan which does show some hatching on here. I don't know whether my – it's not going to show it. So there is some hatching, as the agent said, in terms of this lower density along the frontage of Houghton Road and then wrapping round on the east, so the edges of the development. But this would be the approved plan if it is approved. The parameter – sorry, the illustrative masterplan is just how it could be	114.

	developed, but that would be saved for a reserved matter stage.	
Chair	Cllr [redacted], did you have a question?	115.
Cllr [redacted]	I did. I had a couple, Chair, further, if I may. So one was going to be a point I think between Cllr [redacted] and Cllr [redacted], we've picked up, but just for avoidance of doubt, the 400 homes figure across the wider allocation, the Officers' advice to us is there is not a policy basis for saying, let's look at a proportion of that and we expected 88 houses, therefore we can apply, let's say 10% on top of 88 and get to what, 96 and part of a house. I think we're clear in being advised that there is no policy basis for saying that that's what it means, but… I'm seeing head shaking, so that's helpful. Was there anything further you wish to say on that? No? Absolutely fine. On my earlier question about tension between the Local and the Neighbourhood Plan, forgive me, I just wonder if we could come back to that. Could I just push Officers on the extent to which it matters that there's a tension for the coherence of the argument that we've got before us. I'm anticipating that that might be a significant point for us later, just to make sure we've taken an opportunity of taking maximum input from you.	116.
Laura Fisher	I don't know if it would be of benefit for everybody in the room just to read out paragraph 7.29 of the report. This talks about the tension. Tension between the Neighbourhood Plan's aim of preventing coalescence and the fact that approximately 400 homes were allocated and that the Neighbourhood Plan accepts that the Local Plan, which was emerging at the time that the Neighbourhood Plan was written, would make the decision about where exactly they would be located. This site subsequently became part of the allocated site SI1 in the Local Plan. And then, as noted, the tilted balance is engaged, policy Neighbourhood Plan 1 is given no weight and Neighbourhood Plan 3 is given significantly reduced weight in the determination of this application. So that's where we've sort of recognised that there was this tension, but then we have site allocation St Ives 1 as allocated.	117.
Cllr [redacted]	Yes, so if I may, I suppose my question is, were we to take the reasoning presented to us by some of the representatives we heard from this evening that actually you can read the Neighbourhood Plan and the Local Plan as compatible on these points, so therefore were we not to see that Houghton and Wyton Neighbourhood Plan 1 has no weight to it at all, if we saw that that had a bit of weight to it, to what extent would that impact or not the, I suppose, the logic of what's being put to us? And I will leave it. Forgive me if I'm pushing a point you don't feel able to comment on further.	118.
Laura Fisher	If I could just refer you to paragraph 3.9 of the report in terms of tilted balance being engaged and the policy – Houghton and Wyton Neighbourhood Plan policy 1 is given no weight, as it's been superseded by the site allocation SI1 and policy 3 is given significantly reduced weight noting the conflicts between the policy and allocation SI1.	119.
Cllr [redacted]	Okay. May I ask a final question, Chair? A different point. So again, a number of speakers have touched on the clarification in D8, I think Cllr Sanderson's question earlier pertained to this as well, in our Local Plan. So the final two sentences of that are explaining the tolerance on the 400 figure. It says a 10% tolerance either side of the approximate figure set out is considered to be reasonable, and that's obviously been quoted in the report. The speaker on behalf of the Parish Council put to my understanding very considerable weight on the significance of the following words in the final sentence: All housing capacity should be design-led. And then it goes on to say how you might justify going beyond the 10% tolerance. I just wonder if Officers would like to comment on how much we can and can't defensibly read into that phrase of design-led. I think that it was being put to us that really we should take design-led to mean there should have been a masterplan already and the absence of a masterplan already means it's sort of is	120.

	impossible for it to be design-led. The argument was made in response to my question to the Parish Council representative that the fact that SI1 talks about having a masterplan in it means that this is even more strongly understandable as meaning a masterplan. I think that's contrary to the advice we've got from Officers. I just wonder if you'd like to unpack what design-led sort of does and doesn't mean or how narrow a term it is in terms of the existence of a masterplan or not.	
Laura Fisher	So I guess it is design-led and the current proposal we've got does link in with the adjacent developments in terms of footpath connections and we've got the other developments either side, so I would say it is design-led. I know we haven't had a masterplan for the reasons we've gone over. Have you got anything else to add?	121.
Cllr [redacted]	No, that's helpful. So the advice is that it's not credible to interpret design-led in a way that suggests the application before us hasn't been led by design.	122.
Chair	Thank you. Are there any other questions of clarification? Cllr [redacted].	123.
Cllr [redacted]	Thank you. Just one very quick question, Chair. Would we normally expect a masterplan in a development like this or any other come to that? Thank you.	124.
Officer 1	Yes, through you, Chair, I mean, I think what's been gone over in the actual Officer's report is the allocation itself, the allocation as a whole, would normally have been accompanied by a masterplan. However, as it's been put across this evening, the actual site itself or a number of portions of that site had come forward in advance of the actual Local Plan – the allocation being ratified as part of the Local Plan. So the ideal scenario would have been, yes, there would have been a masterplan before any of the sites would have come forward, but unfortunately that wasn't the situation the Authority found itself in.	125.
Chair	Thank you. Are there any other questions? Cllr [redacted].	126.
Cllr [redacted]	Can I just go back to my question about restrictive covenants, thanks.	127.
Laura Fisher	I'm not aware of any, I'll be honest, but on the parameter plan it does mention about water main easements and foul water rising main and easements. Is that what you were referring to? Or is there something else?	128.
Chair	I can bring in Legal on this.	129.
Legal Officer	Thank you, yeah, through you, Chair. Restrictive covenants, easements, anything relating to sort of private rights are not really the sort of purview of the Planning Committee. An applicant applies for planning permission, they have to then be able to realise that planning permission by making sure all the necessary consents with other landowners, things like that, are all in situ before they can build out. They obviously come to the planning – Local Planning Authority for planning permission, but then they need to make sure that that they've served the correct certificates in terms of land ownership. They have to deal with that point, frankly. Anyone could apply for planning permission anywhere, whether they can then realise that is a sort of wider point and we can't be bogged down by those kind of conflicts which go on outside of the Officers' sort of capabilities to negotiate that. That's for the applicants.	130.
Cllr [redacted]	Okay. Thank you. I get that. It's just I mean, we're all here spending this time discussing this and it's, I mean, if those restrictive covenants have got stuff in them that would negate having this conversation, I'm sure the developers have looked at that, but it would just be useful to kind of know those background pieces sometimes.	131.
Chair	Thank you. We will move on to the next part of the meeting which is the debate, where Councillors can speak about how they are thinking and how they want to move ahead in making a decision. Is there anyone who would like to start that debate for me? Cllr [redacted]. Thank you.	132.
Cllr [redacted]	I can't believe I put my hand up for that one. I'm just going to make some observations really for other deliberations, I suppose. The first one I looked at is it allocated? Well yes, it is, so clearly that's a tick in the box. Are we in tilted balance? Yes. Does it make a difference to this one? I don't know whether it does or not to be honest, because it was in the Local Plan anyway, so tilted balance might not make a difference, but I'm not sure about if it does on the number game. None of the technical consultees have had issues with it.	133.

	What I do have problems with in my own mind is still this density factor, the fact that it's on the edge, the fact that it's trying to separate between Houghton and Wyton and St Ives. The allocation, had it been potentially 88 as opposed to potentially 120, might have made my mind a bit clearer. I think it has been design-led, although I do comprehend that there's not been a masterplan that sometimes comes with this one, but it obviously has to link into the other phases. And I suppose from a masterplan perspective, I mean it's only really been two years since this came in and there were others. My main concern, as I think a number of the speakers have said as well on this one, is just this business around density which I still haven't quite got my head round as to there seems to be a variation of density on some of it, which I'll be honest, I can't see in here because we're just being asked to look at up to 120. So if it goes through and Officers recommend it, they could look at it and say, yes, we can adjust that to ensure that it doesn't look quite so built up on that edge. I think I'll leave it there, Chair, because at the moment I'm a little bit betwixt and between on it. There's some good aspects on it from the fact that it was originally, as I said, originally allocated. Yes, we do need housing, there's affordable housing there, but there always has to be a balance and I just have a slight concern on not necessarily the gap, because I think the gap is bearable. I think it's just maybe how it looks as a gap with the density on the edge. Thank you, Chair.	
Chair	Thank you. Cllr [redacted].	134.
Cllr [redacted]	Thank you, Chair. Just playing second fiddle to Cllr [redacted] now because he's stolen a lot of what I was about to say. I think the two issues, I'm not going to labour the point, is the density and the gap between what's now going to become Houghton and St Ives. I think on both counts I'd like to have seen it lower on the density and obviously greater on the gap. The gap carries lesser weight I think. We're not going to be able to dictate too much on that one because I think it's there is a gap and there's obviously no policy, it's not a set figure there, is it? It's you must have a gap. So that doesn't exist. There is a gap and that's what we've got to run with at the moment. I'm more towards approval, but I'm not there yet. I think I take comfort in, and I hope that should this go further, I hope that the residents that have all spoken very passionately and with good cases, I hope they can take some sort of, I don't know the right word now, but some heart out of the fact that this is only an outline application at the moment. There's obviously a phenomenal amount of work gone into this already, just in the pack alone, let alone the application, and I think there's a phenomenal amount of work yet to get it to a full application. So I think we have to take some heart from the fact that this will come back to us, I'm sure, to sort of tidy this one up. And hopefully between now and then, should it go down that route, some of these issues will be cleared up and it should make it a little bit easier for when it does come back as a full application. But again, I'll leave it there and just see where the debate takes us. Thank you.	135.
Chair	Thank you very much. Cllr [redacted].	136.
Cllr [redacted]	Thank you, Chair. Again, we've heard from all of the speakers they're not necessarily against development, what they're concerned with is some of the separation, some of the density and so on. And when you look at the northern part, that's where they're saying, well, overall the site is at 32.6 I think it was – 32.3 density, but with the northern part going to be at a reduced density, that means the rest is going to be at a higher. So we've not got that sight, we've not got that insight because obviously that will come later on. And I think to my mind, it's this 10% of 400 that is the problem. And if you say – if you want to play devil's advocate, they could have gone as a total for the	137.

	whole site of 440, another 15 on top of this. Were it to be just 10% of the site, the 88, I think we wouldn't have this discussion. I think it would have been fairly well gone through, but it just seems that the other sites by not having that extra, it's brought it to a head here. And I'm still undecided on this one, there's a long way to go, but I do think we do need to really think long and hard to make sure that what we're developing here is something that is good for St Ives, for Houghton and so on. We do need to get this right.	
Chair	Thank you, Cllr [redacted]. Cllr [redacted].	138.
Cllr [redacted]	Thank you, Chair, and thank you to everybody who's come here tonight to talk so passionately about this. Yeah, I agree with what's been said before. I have concerns about the density. I think if we were just putting those 80 houses on there, I think the Parish would have agreed with it and worked very closely. I do have concern that there wasn't a masterplan. I understand your reasons for it, but it does go through the whole of this report, whether it's your report or the Parish Council's report. And it just seems a shame that that didn't happen. I still have concerns about the traffic as well. That junction is very wide and I understand about the movements, but that traffic's got to go somewhere and it's going to go down to a road to another set of traffic lights, to another set of traffic lights and it's got to go somewhere and there's nowhere else for it to go except Harrison's Way if you're going to work in Cambridge or the guided bus or into Huntingdon. So I'm afraid I have some really grave concerns about this. As I said, the density one is one of them and I'm yet to be convinced that I would approve this. I know a lot of work has gone into this, and I thank the Officer for the report, but I still have grave concerns about it.	139.
Chair	Cllr [redacted].	140.
Cllr [redacted]	Thank you, Chair. I agree with Cllr [redacted] that – well, first of all, I think the people here this evening, I think the Parish Council have spoken very well. They've clearly put a lot of work into their submissions and I do appreciate their concerns. But I think they should take some heart I think with Cllr [redacted] phrase, some comfort perhaps. This is an outline application as we know. Important that we bear that in mind. So it will come back, reserved matters I assume will come back to this Committee at some stage. And questions, we don't have the details of course, by definition, yet, so I think some of the questions that we've got will be answered as we go through the process, were we to approve this this evening, as we go through the reserved matters stage. I think it was – was it Cllr [redacted]? I probably – apologies if I've misquoted you, Jon – or somebody mentioned the – sorry it was Cllr [redacted], the allocation. We've heard a clear – we got a clear answer and it's in the report 7.23, it's within the 10% threshold, isn't it? But it's across the allocated site in the Local Plan. And we've also had I think a pretty clear answer about the distances. I think Cllr [redacted] when he spoke mentioned the football field analogy, but I think I actually should know the answer to this question because I'm a football fan, but I think the shortest distance is actually just under 131m. So some of the distances between this area and St Ives will be further than that, they'll be greater than that. I'm inclined – and we have also had a very clear answer from Jez Tuttle from the County Council Highways. I'm inclined that we approve this application, but I'm happy to hear from other speakers. Thank you.	141.
Chair	Cllr [redacted]	142.
Cllr [redacted]	Thank you. Yeah, I'm also grateful to all who have brought forward views this evening, but clearly many more have inputted into the views we've heard represented tonight and it's certainly clear what the strength of local feeling is. I think as we referenced earlier and I had an exchange with Cllr [redacted], I think he acknowledged that, for better or ill, this isn't a democratic decision in the normal sense of the term. It's a decision we need to take as democratically elected Councillors on the interpretation of our rules and policies, the local ones, the national ones, that the law requires us to apply here.	143.

	So as Cllr [redacted] noted, the question for us isn't what would be ideal, what would be an easy decision to take, what's the most popular one. It's on the application before us and we need to make a decision that's defensible. We heard from one of our speakers DMC makes the final decision. That's obviously only true if we do make a decision we then successfully defend. Otherwise, we don't make the final decision and any conditions we might wish to apply to an application fall by the wayside as well. So a decision that's not defensible, overturned on appeal, can be, if I can put it like this, worse as an outcome from the point of view of those who don't wish it to take place than a decision by our Committee to approve with the various conditions we're able to apply. So I suppose that's the context of our conversation, as I know we all well appreciate. Cllr [redacted] raised the question about whether the tilted balance made a difference here and I appreciate that was I think a partly rhetorical point, but for avoidance of doubt, the tilted balance very much is relevant. We've heard that clearly from our Officers. I mean it's demonstrably true given our housing numbers. And what that means is that to defend refusing this application, acknowledging it is simply an outline application as Cllr [redacted] drawn attention to, we need to consider that – not only that it does harm, but that harm significantly and demonstrably outweighs the benefits here. And that is a high threshold for defending refusal. On a couple of the points that colleagues have picked up around the table, I don't think it's credible to say that this hasn't been design-led either, which is the necessary belief I think we'd have to take to dismiss the 10% threshold sort of out of hand. I think the 10% tolerance clearly does apply to the 400, sort of 440 homes within the tolerance of the policy, a policy that allows going beyond that tolerance in certain situations that don't arise here. I think that is clearly the context we need to make a decision in. We've heard clearly that that original 400 figure isn't separated out by section of this allocation, it's a figure across the allocation as a whole. So I don't see we can defend an interpretation that says we can only look at the number of houses we would have expected in this section of the allocation and then apply 10% to that. So I don't see that the numbers of houses here present a defensible ground for refusal in my mind. And as Cllr [redacted] and Cllr [redacted] have drawn attention to, because it's outline, it's up to that number. Reserved matters applications would still have to show that the number they did pick complied with the various rules. Cllr [redacted] raised transport concerns, again which are hugely understandable, particularly for many of us who know that route well and congestion on it. But Highways have – we're very grateful having a Highways Officer here this evening. I think in the context of the Highways position on this and the lack of objection, there's clearly no defensible refusal on transport grounds here either. For me, colleagues, where my primary concerns are, are around the gap between the communities. I think even if the Neighbourhood Plan carries no weight on the basis of the argument in our Officers' report, our own plan policy SI1 in paragraph G does talk about the need to recognise boundaries. In view of tilted balance, we can only apply some weight to that, but I think there's clearly a weight that we should have in our mind and clearly that's a relevant factor for the local communities. So I think the decision I'm weighing up in my mind is, to the extent that we can apply weight to that requirement and to the extent that the application before us impacts the boundary between the communities, which I think it demonstrably does, even if you can reach different sort of subjective views about how significant that is, the question I'm weighing up is, is that impact so significant that there's significant and demonstrable harm here?	

	And that's the hurdle I'm not seeing that is reached, even though that's my I think primary area of concern after having heard others' views and Officers' advice. It's around that gap. I think that's clearly an issue in our policies and for the community, but I don't think we can credibly defend it being enough of an issue to refuse this application. So I'm certainly minded to support this outline application and I'm open to hearing views from others as well, but I am prepared to make a proposal if you would like one at this stage, Chair.	
Chair	If you're willing to put that as a proposal, then I will accept that as a proposal. Cllr [redacted]	144.
Cllr [redacted]	Thank you, Chair. Yeah, the separation gap that we're all looking at, I don't think it would make much difference whether you build 88 on there or 120. That gap is going to be much the same and I doubt whether it would change at all, so forget about the gap. That gap is there. The density I have problems with, and I feel for quite a few of the speakers that have been before us tonight and I understand their feelings. But we as a panel, we have to decide whether the benefits outweigh the harm basically and that's always our question. Do the benefits outweigh the harm? And I feel that it's a difficult decision, but the benefits of the extra dwellings cancel out the harm. Because if we refuse this, the 106 monies will change, well, at least anyway, that's assuming that it doesn't go to appeal. So we gain on the 106 if we accept it as it is and we gain on the affordable which is very important and it probably means another 30 or 13 houses I think more on the affordable side. So I shall be supporting the decision to recommend powers be delegated to the Head of Planning. So I will second Cllr [redacted] proposal if you'll accept that.	145.
Chair	Thank you. I will accept that as being a second to the proposal. Are there any other speakers that wish to add anything before we go to a decision? Cllr [redacted].	146.
Cllr [redacted]	Thank you. Just a point of clarity for those listening both here and elsewhere, does this come back as full to DMC?	147.
Chair	Can I bring you in just to confirm?	148.
Officer 1	I mean, yes, in terms of the reserved matters submission, that is something that could be potentially called in by Members. Obviously, it could be referred from my position in terms of the – from the Service Manager. So yes, at this stage, yes. However, there is the national scheme of delegation that, subject to how that's worded, may change that, but as it stands at this moment in time, the answer is yes, Councillor.	149.
Chair	Thank you. So we have a recommendation that the powers be delegated to the Head of Planning, Infrastructure and Public Protection to approve subject to conditions and completion of a Section 106 application, or refuse in the event that the obligation referred to above has not been completed and the applicant is unwilling to agree to an extended period for determination or on the grounds that the applicant is unwilling to complete the obligation necessary to make the development acceptable. All those –	150.
Cllr [redacted]	Chair, forgive me, before you take a vote, there was just one point that I'm conscious we haven't picked up, the reference from the Highways Officer about the change of technology on the junction that would assist the congestion issues. Is there any condition that it would be helpful to add to the proposal to make that more likely to happen.	151.
Laura Fisher	That one's – so yes, in terms of the proposed conditions, there is a list in section 8 of the report and the third one up from the bottom says, the installation of MOVA at the site access signal control junction with the A1123 prior to occupation. In brackets after that it says, unless provided by Morris Homes in the meantime under section 278 works. So yes, we have added that as a condition, having received the comments through from the Highways Transport Assessment Team.	152.
Cllr [redacted]	So forgive my lack of expertise about the highways technologies. So the reference from our Highways Officer this evening wasn't to anything beyond what's covered in the recommending conditions already?	153.
Laura Fisher	That's correct.	154.

Cllr [redacted]	In which case, forgive me. Carry on, Chair. The proposal stands un-amended.	155.
Chair	So we will go to the vote. So we are voting for approval to delegate powers to the Head of Planning. All those in favour of approval, please raise your hand.	156.
M2	1, 2, 3, 4, 5, 6, 7, 8, 9.	157.
Chair	Any against?	158.
M2	1, 2, 3.	159.
Chair	Any abstentions? Therefore that has been approved to delegated powers.	160.

ST IVES TOWN COUNCIL

Town Hall, Market Hill, St Ives, Huntingdonshire PE27 5AL
Telephone: 01480 388929 Email: townclerk@stivestowncouncil.gov.uk
Town Clerk: Mrs Libby White BEM BA(Hons) FSLCC

TWINNED WITH STADTALLENDORF

29th August 2025

[redacted]

Huntingdonshire District Council
Planning Development Control
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

Attn: Laura Fisher, Case Officer

Dear Sir/Madam

RE: Land Between Houghton Grange and The How, Houghton Road, Houghton

23/00627/OUT: Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works.

St Ives Town Council wishes to express their concerns regarding the recent decision made regarding Planning Application 23/00627/OUT.

We understand that Houghton and Wyton Parish Council have recently employed Richard Buxton Solicitors to object to the decisions made regarding Planning Application 23/00627/OUT, Houghton Grange Phase 2 – Land Between Houghton Grange and The How, Houghton Road, Houghton) and concerns of malpractice. We support our neighbouring council in their objections to this application and proposed development.

In May 2025, our Planning Committee reviewed this planning application and provided the following recommendation to Huntingdonshire District Council:

> *"St Ives Town Council recommends objection to the application, which was unanimous. Members noted that the Local Plan allocated 88 homes, plus or minus ten percent. The application's plan exceeds this number, and the Committee strongly feels that a figure of minus ten percent would be more appropriate for the area (79 homes). Councillors shared*

local residents' views on the application, noting that many objections have been made by the public.

The Committee expressed concerns on grounds of overdevelopment and a significant strain on local infrastructure and resources. Traffic and congestion issues are a major concern for the Council and local residents. The existing traffic figures and congestion levels on Houghton Road are already very high. This would only increase further with the proposed application.

Additionally, the proposed density of 25dph for the development is not suitable for the edge of a town which cannot sustain a central town density. The application would also eliminate a significant amount of the green space between St Ives and Houghton."

St Ives Town Council strongly stands behind our original comments, listed above, and expresses concern that the number of residential houses appears to be up to the discretion of District Council officers. We must formally request that the public consultation be re-run due to concerns regarding appropriate practice.

In addition, a copy of this letter will be published to the St Ives Town Council website; this is to inform our residents of the actions we have taken and to make a statement that the manner in which this application has been handled is entirely unacceptable.

We encourage Huntingdonshire District Council to kindly consider our request.

[redacted]

Town Clerk

Development Management Committee

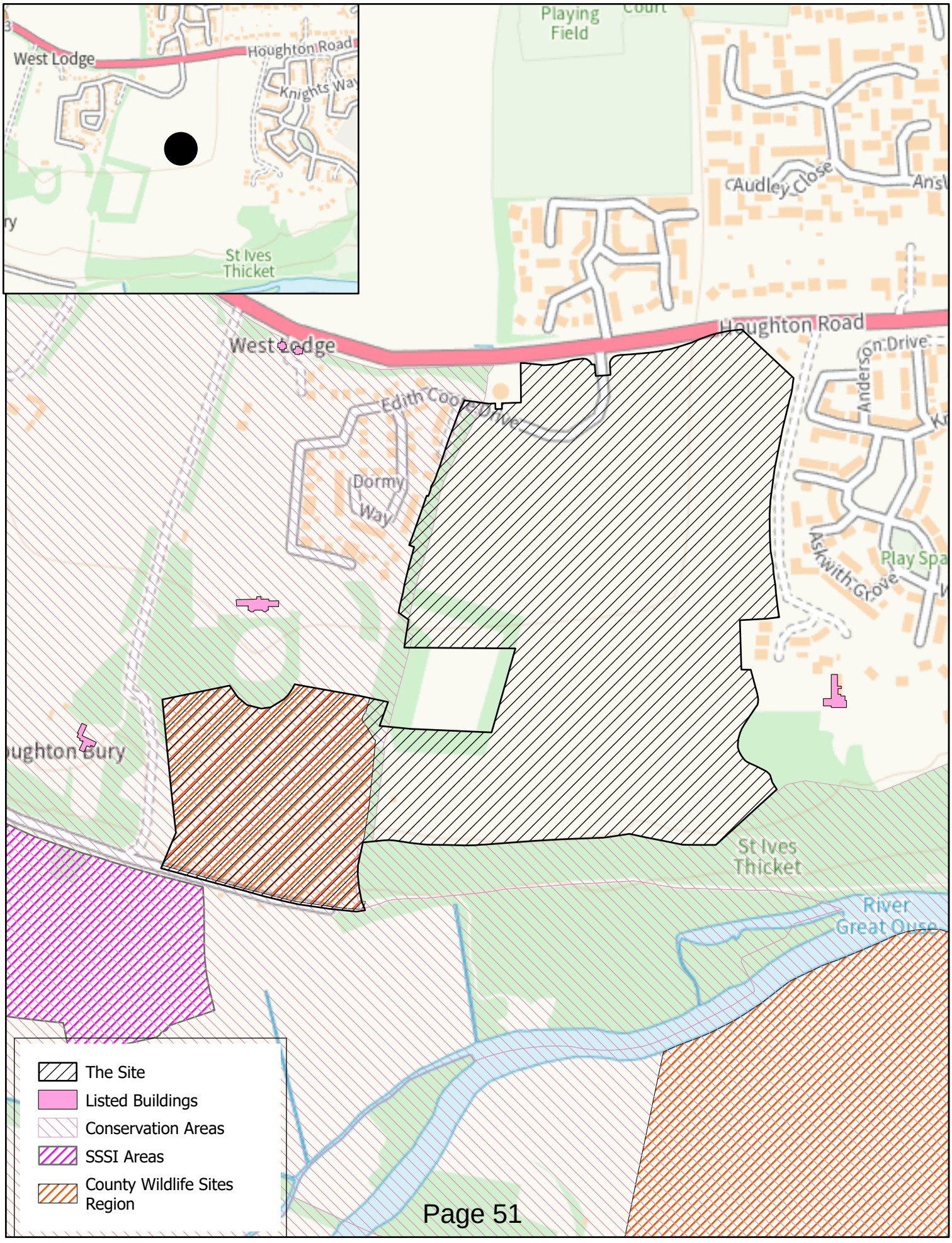
Application Ref: 23/00627/OUT

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Date Created: 09/010/2025

Huntingdonshire DISTRICT COUNCIL

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Development Management Committee
Application Ref: 23/00627/OUT

Scale = 1:5,000

Date Created: 09/10/2025

Huntingdonshire DISTRICT COUNCIL

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DEVELOPMENT MANAGEMENT COMMITTEE 21st JULY 2025

Case No: 23/00627/OUT (Outline Planning Application)

Proposal: Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

Location: Land between Houghton Grange and The How, Houghton Road, Houghton

Applicant: Homes England

Grid Ref: (E) 529919 (N) 272039

Date of Registration: 6th April 2023

Parish: Houghton and Wyton

RECOMMENDATION - POWERS DELEGATED to the Head of Planning, Infrastructure & Public Protection to APPROVE subject to conditions and completion of a Section 106 obligation.

OR

REFUSE in the event that the obligation referred to above has not been completed and the Applicant is unwilling to agree to an extended period for determination, or on the grounds that the Applicant is unwilling to complete the obligation necessary to make the development acceptable.

This application is referred to the Development Management Committee (DMC) as the S106 contributions associated with the development if approved would amount to more than £100,000.00 and the Officer recommendation is contrary to the recommendation of the Parish Council.

1. DESCRIPTION OF SITE AND APPLICATION

1.1 The Houghton Grange Field site which is located within the Parish of Houghton and Wyton comprises approximately 21.87ha of land situated to the eastern edge of the villages of Houghton and Wyton and to the west of the town of St Ives, located to the south of Houghton Road (A1123). The Thicket footpath is located to the south of the site, beyond which is the River Great Ouse floodplain and the settlement of Hemingford Abbots and Hemingford Grey. Part of the Thicket woodland was in the past gifted to the Council by the Biotechnology and Biological Sciences Research Council (BBSRC).

1.2 The Slepe Meadows housing development (Garner Drive) is located to the north whilst to the west is the residential Houghton Grange development phase 1 (being developed by Shelbourne Estates) and to the east is The How development and land formerly part of the golf course (which has been developed for residential purposes known as The Spires). The site has a main pedestrian and vehicular access from Houghton Road, opposite Garner Drive.

1.3 There are five listed buildings close to the site which include the Grade II listed Houghton Grange (Houghton Poultry Research Station); the Grade II listed Houghton Grange East and West Lodges (East Lodge to Houghton Poultry Research Station, West Lodge to Houghton Poultry Research Station); the Grade II listed The How and its curtilage listed Gate Lodge and the Grade II listed Houghton Bury.

1.4 The south-western part of the site is located within the Houghton and Wyton Conservation Area and the St Ives and Hemingfords Conservation Areas are located adjacent to the boundary of the site to the south and south-east respectively.

1.5 The Environment Agency flood maps confirm that the majority of the application site is located in Flood Zone 1, which indicates a low probability of flooding from rivers or the sea in any given year of less than 1 in 1000. There is a very small area at the southernmost tip of the application site which lies partially within Flood Zones 2 and 3, as shown on the updated 2025 Environment Agency maps. The very small proportion of the site within Flood Zone 3 is not material to the proposed development.

1.6 There are statutory ecological designations within the site; part of the application site (to the south of Houghton Grange) comprises a County Wildlife Site. The nearest Site of Special Scientific Interest is the Houghton Meadows SSSI, located to the south west of the site.

1.7 There are a number of trees around the edge of the site and a group within the centre which are subject to a Tree Preservation Order (TPO) (reference 015/91).

1.8 The topography of the site is such that the site generally falls gently from the north to the south towards the River Great Ouse floodplain. Ground levels are approximately 33m AOD in the north, falling to approximately 21-24m AOD across the majority of the area. In the south western part of the site, the ground levels reduce more steeply to approximately 9m AOD, and 7.8m AOD in the most southern point.

1.9 The Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document (SPD) confirms that the site is located within the 'Western Periphery' character area. The site is not located within any statutory landscape designations.

1.10 The application site forms part of the land allocated for residential development in the Local Plan to 2036 within allocation SI 1 'St Ives West'; referred to previously and within the Local Plan as the BBSRC Field Site. The land to the east of the application site comprises The How along with the former St Ives Golf Course, the latter of which has been developed by Barratt Homes as 'The Spires'. The southern part of the former Golf Course is a publicly accessible Strategic Green Space covering approximately 8.4 hectares known as Berman Park. Both the application site and land further to the east and west (Houghton Grange) form part of the Local Plan allocation.

1.11 The application has been made in outline form with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. Details relating to access, layout, scale, appearance and landscaping have been reserved for subsequent approval.

1.12 The final number of dwellings will be determined at the detailed design stage however it is anticipated that the site will achieve up to 120 dwellings. The development will be served from the existing access road (Edith Coote Drive) taken off the A1123 - Houghton Road (already constructed as this serves the adjacent Houghton Grange phase 1 site).

1.13 The application is supported by a Planning Statement, Planning Obligations – Heads of Terms note, Statement of Community Involvement, Design and Access Statement, Cultural Heritage Desk-based Assessment, Transport Assessment, Framework Residential Travel Plan, Landscape and Visual Assessment, Ecological Impact Assessment, Biodiversity Net Gain Assessment, Arboricultural Impact Assessment, Flood Risk Assessment and Drainage Strategy, Phase 1 Land Contamination Report, Noise Assessment, Rapid Health Impact Assessment, Illustrative Masterplan, and Parameter Plan.

1.14 Amendments have been received during consideration of this application, which have been consulted upon accordingly.

2. NATIONAL GUIDANCE

2.1 The National Planning Policy Framework 2024 (NPPF) sets out the three economic, social and environmental objectives of the planning system to contribute to the achievement of sustainable development. The NPPF confirms that 'So sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development…' (para. 10). The NPPF sets out the Government's planning policies for, amongst other things:

- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- achieving well-designed, beautiful and safe places; and
- conserving and enhancing the natural, built and historic environment.

2.2 The National Planning Practice Guidance (NPPG), the National Design Guide 2019 (NDG) and the Noise Policy Statement for England (NPSE) are also relevant and a material consideration.

2.3 For full details visit the government website National Guidance.

2.4 Relevant Legislation:

- Planning and Compulsory Purchase Act 2004
- Town and Country Planning Act 1990 (as amended)
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Ancient Monuments and Archaeological Areas Act 1979

3. PLANNING POLICIES

3.1 Huntingdonshire's Local Plan to 2036 (Adopted 15th May 2019):

- LP1 Amount of Development
- LP2 Strategy for Development
- LP3 Green Infrastructure
- LP4 Contributing to Infrastructure Delivery
- LP5 Flood risk
- LP6 Waste Water Management
- LP11 Design Context
- LP12 Design Implementation
- LP13 Placemaking
- LP14 Amenity
- LP15 Surface Water
- LP16 Sustainable Travel
- LP17 Parking Provision and Vehicle Movement
- LP24 Affordable Housing Provision
- LP25 Housing Mix
- LP29 Health Impact Assessment
- LP30 Biodiversity and Geodiversity
- LP31 Trees, Woodland, Hedges and Hedgerows
- LP 34 Heritage Assets and their Settings
- LP37 Ground Contamination and Groundwater Pollution
- SI1 St Ives West

3.2 Houghton & Wyton Neighbourhood Development Plan 2018 - 2036 (March 2018):

- Policy HWNP1 - Houghton and Wyton built up area
- Policy HWNP2 - Protection of sites
- Policy HWNP3 - Anti-coalescence
- Policy HWNP6 - Retaining and enhancing biodiversity
- Policy HWNP7 - Protection of best and most versatile agricultural land
- Policy HWNP11 - Provision of new community facilities
- Policy HWNP12 - Parking to serve new development/Houghton and Wyton village
- Policy HWNP13 - Access by non-car modes
- Policy HWNP14 - Flooding and drainage
- Policy HWNP16 – Windfall residential development
- Policy HWNP17 - Design of new development

3.3 Supplementary Planning Documents / other guidance:

- Huntingdonshire Design Guide Supplementary Planning Document (2017)
- Developer Contributions SPD (2011)

- Huntingdonshire Landscape and Townscape Assessment (2022)
- Cambridgeshire Flood and Water SPD (2017)
- Huntingdonshire Tree Guidance Note 3
- Annual Monitoring Report – Part 1 (Housing Supply) 2023/2024 (24 October 2024)
- Annual Monitoring Report – Part 2 (Policy Analysis) 2023/2024 (20 December 2024)
- RECAP CCC Waste Management Design Guide (CCC SPD) (2012)
- Houghton & Wyton Conservation Area Character Assessment (2012)
- St Ives Conservation Area Character Assessment (2007)
- The Hemingfords Conservation Area Character Assessment (2008)
- Huntingdonshire District Council Playing Pitch and Outdoor Sports Strategy Document (December 2022)

For full details visit the Council's website Local policies

Housing Land Supply

3.4 NPPF paragraph 78 requires the Council to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against our housing requirement. A substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements was introduced on 12th December 2024 in the revised NPPF and associated NPPG (the standard method).

3.5 As Huntingdonshire's Local Plan to 2036 is now over 5 years old it is necessary to demonstrate a five-year housing land supply (5YHLS) based on the housing requirement set using the standard method. NPPF paragraph 78 also requires provision of a buffer to ensure choice and competition in the market for land. As Huntingdonshire has successfully exceeded the requirements of the Housing Delivery Test a 5% buffer is required here. The five year housing land requirement including a 5% buffer is 5,501 homes. The current 5YHLS is 4,330 homes equivalent to 3.94 years' supply.

3.6 As a result of this, the presumption in favour of sustainable development is applied for decision-taking in accordance with paragraph 11 (d) and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as 'the tilted balance'. While no 5YHLS can be demonstrated the Local Plan policies concerned with the supply and location of housing as set out in the Development Strategy chapter (including policies LP2, LP7, LP8, LP9 and LP10) of

Huntingdonshire's Local Plan to 2036 are considered to be out of date and can no longer be afforded full weight in the determination of planning applications.

3.7 The Huntingdonshire Local Plan to 2036 confirms the strategic policies within the Plan (those which are essential to the delivery of the Local Plan strategy) includes the site allocations, and that Neighbourhood Plans must be prepared in general conformity with the strategic policies of the Local Plan. It is acknowledged that the Local Plan is more recent than the Neighbourhood Plan; therefore, the Local Plan takes precedence, as set out in paragraph 31 of the NPPF.

3.8 The application site is allocated under policy SI 1 'St Ives West' of Huntingdonshire's Local Plan to 2036. Allocation SI 1 stands as adopted in the Local Plan and is not considered to be out of date; policy SI1 is therefore afforded significant weight in the determination of this planning application.

3.9 The Houghton and Wyton Neighbourhood Plan (NP) was adopted in 2018. As the tilted balance is engaged a number of policies within the NP are given reduced weight in the determination of this application. In addition to the tilted balance being engaged, Policy HWNP1 is given no weight as it has been superseded by the site allocation SI 1 and Policy HWNP3 is given significantly reduced weight, noting the conflicts between this policy and allocation SI 1.

4. PLANNING HISTORY

4.1 As referred to at paragraph 1.2 and within the 'Principle of Development' section of this report, there are a number of planning permissions for the surrounding developments, as set out below.

4.2 The David Wilson Homes permissions (9801132OUT and 0900023REM) for residential development and reserved matters details for the erection of 128 dwellings; this development (forming Phase 1 of the Spires development) is now complete.

4.3 The Barratt Homes permissions (1301895OUT, 17/00589/REM, 17/02325/FUL and 19/01671/FUL) relate to the erection of 186 dwellings and change of use of part of the former golf course to a country park (Strategic Green Space); this development (forming part of the Spires development) is now complete.

4.4 Houghton Grange (phase 1) has in total 107 dwellings. This comprises of 5 dwellings within the converted listed Grange (20/01438/FUL), the refurbishment and extension of the two listed lodges (East and West) and 100 new builds on the site, including

4 replacement dwellings (1402210OUT, 19/00828/S73 and 19/01180/REM). The net increase of dwellings at Houghton Grange (phase 1) is therefore 101 dwellings; these are currently being built on site.

4.5 Land associated with The How has permission (19/02280/FUL and 21/02079/S73) for the erection of 18 new dwellings and the refurbishment and extension of the curtilage listed Gate Lodge; this development is currently being built on site.

4.6 1301056OUT - Outline application for 224 dwellings and retail unit and associated roads, pathways, Public Open Space, and landscape – Withdrawn 08.09.2020.

4.7 21/70046/SCRE - EIA Screening Opinion – Response issued 24.03.2021 and is in the public domain. The response concludes that the Local Planning Authority opines the proposed development is not EIA development.

5. CONSULTATIONS

5.1 Houghton and Wyton Parish Council (H&W PC) (COMMENTS ATTACHED dated 28.06.2023) – recommends REFUSAL. The H&W PC objections are detailed in a letter prepared by Richard Buxton solicitors which raises the following summarised objections to the proposals:

- That the development is contrary to the adopted Huntingdonshire Local Plan (in particular policies LP2, LP3, LP10, LP11, LP12 and site allocation policy SI 1);
- That the development is contrary to policies of the Houghton Neighbourhood Plan (in particular policies HWNP1 and HWNP3); and
- That the development is contrary to the NPPF paragraph 174.

In addition, H&W PC commissioned Peter Radmall Associates to prepare two reports: (i) a Review of the Applicant's Landscape and Visual Appraisal ("the LVA Review"), and (ii) Implications for Separation between Houghton and St Ives ("the Separation Report").

5.2 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 22.10.2024) – recommends REFUSAL maintaining their original objections in respect of the development being contrary with policies within the Local Plan, Neighbourhood Plan and the NPPF. A detailed letter has been submitted by Richard Buxton solicitors on behalf of H&W PC which notes that the setback of the development along Houghton Road has been increased which is welcomed, but there has been no reduction in the scale of development; concerns are therefore raised in relation to the density of development proposed. A further review of the LVA

(prepared by Peter Radmall Associates on behalf of H&W PC) was also submitted, raising concerns relating to the amended LVA.

5.3 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 28.02.2025) – recommends REFUSAL and includes an Update Review on the LVA "A review of the applicants revised LVA" prepared by Peter Radmall Associates, which states that there are a number of concerns that are considered to remain as unaddressed. Again, a detailed letter has been submitted by Richard Buxton solicitors on behalf of H&W PC raising concerns relating to the development being contrary with policies within the Local Plan, Neighbourhood Plan and the NPPF. The letter also raises concerns in relation to the density of the proposals and considers that the tone of the application takes no account of local considerations from the parish and neighbouring councils.

5.4 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 24.04.2025) – recommends REFUSAL noting that whilst welcoming the removal of the LEAP from the countryside separation gap, relocating this as an informal play area in the linear green space seems inadequate. They consider that a second LEAP should feature within the developable area, and that there is enough space if the number of homes were reduced. The PC consider that if the proposals were reduced in scale and remodelled then a MUGA or tennis courts could be provided to relieve capacity on the village playing field. Concerns have been reiterated in relation to the number of houses proposed within the village and the capacity of community infrastructure (when taking into account Houghton Grange phase 1 proposals), the density of development proposed and that the proposals would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area, as has been cited on a reason for refusal under application reference 24/02275/FUL[1]. The PC consider that there is a more acceptable solution to the development of this site by reducing the amount of houses which would create more space for play and leisure facilities, thereby enhancing the perception of separation, complimenting Phase 1 and providing a more fitting density of housing for this countryside / small settlement location (all of which would then be consistent with the alternative proposal shared by the PC previously).

5.5 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 23.05.2025) – recommends REFUSAL, noting that LTP3 and the Houghton & Wyton Neighbourhood Plan Policies HWNP 12 and HWNP 13 all point towards refusing this application as it stands, and towards reconsidering it following a reduction to the

[1] 24/02275/FUL - Development of Use Class C2 Residential Accommodation with Care comprising of apartments for people aged 65 and over, communal facilities, associated landscaping, car parking, services and access from Meadow Lane - Land at junction of Harrison Way and Meadow Lane, St Ives.

excessive number of homes currently proposed. They note that the revised TA submitted with the application shows that by 2028, even without this development, the Houghton Road/Garner Drive/Houghton Grange Site Access junction is forecast to operate above capacity in both the AM and PM peak hour, and that by 2033 the Houghton Road/Hill Rise/ High Leys Junction is also calculated to be over capacity. Comments note that this application already pushes the boundaries of excess by trying to build extra housing, over and above the residual allocation for this single piece of land without justification. The PC have noted that in respect of Policy HWNP12: Parking to serve new development previous comments have noted that by removing the excess housing numbers this would create space for additional recreational facilities such as a MUGA to be allocated on the site and which could include public parking. In respect of Policy HWNP13: Access by non-car modes the PC have noted that the Revised Transport Assessment makes assumptions about the mode of travel that residents will use and models a high percentage of movements by non-motorised modes; however, it is felt that these are excessive and that car usage levels will be greater than assumed. The PC have note that they have anecdotal evidence from existing residents of Houghton Grange Phase 1 that there is a tendency to use the car when visiting the village to participate in the social and recreational life of the village rather than to walk or cycle. Concerns are also raised in relation to access to the centre of the village (which is beyond 15-20 minutes away by foot and 5-10 minutes by bike) and that there is a hill involved in the return journey, pointing to the fact that the site is less sustainable than has been suggested, and that car use will be greater than modelled. The comments conclude that this is another reason why the site should not be considered suitable for additional housing numbers beyond those originally allocated within the Local Plan.

5.6 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 26.06.2025) – requests S106 agreement be secured which provides funds to improve the utilisation of existing parish land for sports and recreation provision, together with new land and infrastructure within the developed footprint of the Houghton Grange Phase II site to provide a new, flexible community sports and recreation facility.

5.7 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 28.06.2023) - recommends REFUSAL raising concerns relating to the layout and density of the buildings and elimination of the green entrance to St Ives; the development area size being larger than that shown in the current Local Plan vision of the area, thus impacting the green space and vista from the road; the number of dwellings proposed should be reduced and at or close to the minimum number within the permitted range (56 houses); and the design of houses should be similar to that in phase 1 of the development and not a smaller more cramped town

style development. The Town council noted their agreement with the concerns from Anglian Water regarding the drainage from the site and also with those from the County Council regarding traffic implications. Concerns have also been raised in relation to the lack of provision for Active Travel connectivity with Houghton village through to Huntingdon. Comments also note that feedback from SITC and local residents was very much in opposition to the proposed development in its current format and general consensus was that many changes were required for it to be acceptable.

5.8 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 14.10.2024) recommends REFUSAL noting that members were unhappy about the brevity of the consultation period for town and parish council feedback. While noting the minor changes to the configuration of properties within the proposed plan, members felt that previous concerns about the number and density of properties being proposed had not been addressed, noting that the number of properties still exceeds HDC's requirements for the area and that the density of 28 properties per hectare far exceeds those for Houghton Grange phase 1 (16 properties per hectare) and it also exceeds that for the Spires development in St Ives (26 properties per hectare). SITC comments that there is no perceived justification for the high density of this application and concerns have also been raised in relation to the impact the development would have on local amenities, including schools. Comments were also made in relation to concerns that the developer had not specified the surface water drainage solution to be used at the site and that the more homes that are built on the site, the greater the flood risk from surface water could be.

5.9 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 13.03.2025) – comments received welcome the increased green space in the north side of the development, however it is noted that this is compensated by the play area being moved to the east side. It is also noted that councillors are looking for the impact to be minimal in terms of the open space between the development and St Ives.

5.10 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 15.05.2025) recommends REFUSAL stating that the Local Plan allocated 88 homes, plus or minus ten percent and that the application’s plan exceeds this number; the Committee strongly feels that a figure of minus ten percent would be more appropriate for the area (79 homes). Comments note that Councillors shared local residents’ views on the application, noting that many objections have been made by the public and that the Committee express concerns on grounds of overdevelopment and a significant strain on local infrastructure and resources. Traffic and congestion issues are also raised as a major concern for the Council and local residents, noting that the existing traffic figures

and congestion levels on Houghton Road are already very high and these would only increase further with the proposed application. Comments received also note that the proposed density of 25dph for the development is not suitable for the edge of a town, which cannot sustain a central town density, and that the application would also eliminate a significant amount of the green space between St Ives and Houghton.

5.11 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 16.05.2023) recommends APPROVAL, noting that the proposals meet the Parish Council's concerns initially raised on impact from the development on Hemingford Grey.

5.12 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 15.10.2024) recommends REFUSAL, noting that the number of trees has reduced and the impact of the proposals on drainage, sewerage and traffic. The Council raises concerns about the increased traffic on the A1123, which is already over capacity and that the proposals would further degrade the buffer between Houghton and St Ives. Comments also state that the density of development is far higher than the surrounding area and would need significantly decreasing to be acceptable.

5.13 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 28.02.2025) recommends REFUSAL noting that the proposals represent overdevelopment of the site and that the development overrules the local plan for Houghton and Wyton, places too much strain on local services and roads, and destroys the historic nature of this village to becoming a suburb of St Ives. The PC note that they would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.

5.14 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 22 April 2025) recommends REFUSAL and whilst reiterating previous comments from 28.02.2025, note that the amendments did not seem to be significantly different from previous submissions.

5.15 Hemingford Abbots Parish Council (HAPC) (as adjacent Parish) (COMMENTS ATTACHED dated 30.05.2023) recommends REFUSAL, noting that the development is not in accordance with HDC's Local Plan in relation to the scale and size of the application, with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC also raised concerns relating to the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal (they note that this is especially relevant to Hemingford

Abbots as any damage to the health of the river would directly affect the parish).

5.16 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 22.10.2024) recommends REFUSAL, noting that the unnecessarily short consultation period sets an unwelcome precedent, and does not promote support for local democracy. Comments provided state that the proposals contradict the local and relevant Neighbourhood Plans and that the high density proposed ignores the anti-coalescence policy. Concerns have also been raised in relation to the potential overflow of surface water into the river and it is requested that a full and proper assessment is made with respect to the capacity of the drainage and irrigation systems for the wider site, because much of the infrastructure in the surrounding area is potentially obsolescent and prone to failure.

5.17 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 05.03.2025) recommends REFUSAL – reiterates comments from 22.10.2024.

5.18 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 29 April 2025) recommends REFUSAL – reiterates comments from 30.05.2023.

5.19 Wyton on the Hill Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 25.06.2023) recommends REFUSAL, noting that they do not object to building on this land, but it needs to be proportionate and given proper attention which they consider this application does not. They note that the application has not followed the local plan and raise concerns relating to transport / traffic, flood risk and drainage issues, the integration of settlements, anti-coalescence and loss of valued landscapes.

5.20 Wyton on the Hill Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 14.10.2024) raises concerns relating to the amount of time given for comments. Requests further time to submit comments and in the meantime queries the size of the gap between Houghton and St Ives, the impact on flooding, and the impact of increased traffic.

5.21 Anglian Water – NO OBJECTIONS, noting that there will be available capacity for wastewater treatment at the St Ives Water Recycling Centre. Details of a scheme for an on-site drainage strategy and on-site foul water drainage works are requested to be secured by condition, along with a number of informatives.

5.22 Cambridgeshire County Council – Education: NO OBJECTIONS subject to securing S106 obligations in relation to Early Years, Primary Education and Libraries and Lifelong Learning.

5.23 Cambridgeshire County Council – Lead Local Flood Authority: NO OBJECTIONS in principle subject to the imposition of conditions.

5.24 Cambridgeshire County Council Transport Assessment team – Following receipt of additional information – NO OBJECTIONS subject to conditions relating to the installation of a MOVA at the site access signal-controlled junction with the A1123 and the provision and implementation of Residential Welcome Packs.

5.25 Cambridgeshire County Council Highways team – NO OBJECTIONS subject to conditions, noting that this is an outline application and the actual layout in the form of roads and buildings will be the subject of a reserved matters application.

5.26 Cambridgeshire Fire and Rescue – NO OBJECTIONS subject to provision being made for fire hydrants by S106 or condition.

5.27 Environment Agency – No comments received (officer note: the significant majority of the site is located within Flood Zone 1).

5.28 Natural England – Has provided standing advice, noting that consideration should be given to the recreational pressure impacts to sensitive Sites of Special Interest (SSSI) which could arise from residential development.

5.29 HDC Active Lifestyles – NO OBJECTIONS, noting that a development with 120 dwellings with an average household size of 2.19 would equate to a total average household size of 263 people; as a result requests an offsite contribution of £72,401.40 towards formal outdoor sports provision.

5.30 HDC Arboricultural Officer – NO OBJECTIONS, subject to conditions which include the submission of a Tree Survey (TS),Tree Protection Plan (TPP) and an Arboricultural Method Statement (AMS) as part of any future reserved matters submission.

5.31 HDC Conservation – Confirms that the impact of the development on the significance of the identified assets has been assessed appropriately. It is noted that there will be less than substantial harm to three designated heritage assets and substantial harm to a non designated heritage asset (medieval ridge and furrow). The officer concludes that in accordance with the NPPF the identified level of harm should be weighed against the public benefits of the proposals.

5.32 HDC Environmental Health (contamination) – Notes that the Phase 1 Site Investigation report indicates that the site requires further investigation, so a full “Phase 2” land contamination investigation is recommended which targets the former Leucosis

Unit, with a less intensive investigation of the “greenfield” land (along with the submission of a remediation scheme, implementation of approved remediation scheme and reporting of unexpected contamination), so NO OBJECTIONS subject to conditions.

5.33 HDC Environmental Health (construction period) – Proposes a condition so that construction times and deliveries during the construction and clearance phases are restricted, so NO OBJECTIONS subject to conditions.

5.34 HDC Environmental Health (noise) – Notes that the importance of noise impact should be considered early in the design stage to avoid the reliance on alternative ventilation provision, but that with appropriate mitigation appropriate noise levels can be achieved, so NO OBJECTIONS subject to a condition.

5.35 HDC’s Landscape Consultant (Expert Landscape Consultancy, April 2024, November 2024 and June 2025) – NO OBJECTIONS and considers that the submitted LVA provides a fair assessment of the landscape and visual effects of the development.

5.36 HDC Urban Design Officer – NO OBJECTIONS, noting that the amended scheme is considered acceptable with the key design principles illustrated on the Parameter Plan, and quantum of development illustrated on the Illustrative Masterplan.

5.37 HDC Planning Policy Officer – NO OBJECTIONS, confirming that the information submitted appears to align well with the requirements of the allocation. It has been noted that the cumulative proposals of this scheme in conjunction with the permitted portions of the allocated site will achieve a housing number below that allocated when including the acceptable 10% tolerance set out in paragraph D.8, and that cumulatively it will achieve more green space than that required through the allocation and a substantial proportion of biodiversity net gain. The indicative layout illustrates housing being focussed in the northern part of the site and retaining a substantial band of green space between new homes and the western edge of The Spires development, in accordance with paragraph 11.9 of the Local Plan.

5.38 Historic England – No comments to make and advises to seek views of specialist conservation and archaeological advisors.

5.39 Cambridgeshire County Council Archaeology - Due to the limited results of archaeological works in the locality, there are NO OBJECTIONS or requirements.

5.40 Cambridgeshire County Council Definitive Maps team – NO OBJECTIONS subject to a condition, noting that Public Footpath

Number 8, Houghton and Wyton is located in the south-west section of the site and that the applicant should ensure that there is connectivity between this footpath and the proposed new public highways of the adjacent planning sites.

5.41 NHS – NO OBJECTIONS subject to securing a financial contribution towards the capital cost of delivering the additional primary care floorspace required to serve residents of the new development (towards refurbishment/ extension at the Spinney Surgery in St Ives). Based upon the population generated, for a development of 120 dwellings that would result in 276 people, this would amount to £119,074.00.

5.42 Police Designing Out Crime Officer – notes that whilst this is at an early stage of development it is important that security and crime prevention are considered and discussed at the earliest opportunity to ensure that the security of buildings, and the environment provide a safe place for residents and visitors and should be considered as an integral part of any initial design for proposed development's, it should incorporate the standards of "Secured by Design", to design out crime and reduce the opportunities for crime. Further comments are withheld until a reserved matters application is submitted.

5.43 Wildlife Trust - NO OBJECTIONS subject to conditions which include securing a LEMP, compliance with the submitted Ecological Impact Assessment and an update to the BNG metric (once the detailed layout of the development is known).

6. REPRESENTATIONS

6.1 The following table summarises the 136 comments received (in no particular order) from people that have made representations to the Local Planning Authority relating to the original application and the re-consultations. Several people have submitted more than one representation, typically responding to each consultation undertaken.

Issue / concern raised	Number of comments received
The gap between Houghton and St Ives is too narrow and does not maintain a 'substantial band of green space'.	59
Houghton will become a satellite of St Ives and will lose its identity, changing its character beyond recognition.	37
Overdevelopment of the site.	28
Density of the development is too high and much higher than other developments in the immediate vicinity.	33
Does not comply with HDC Local Plan Policy SI1 (by exceeding the site allocation and as no masterplan has been submitted).	35
Does not comply with HDC Local Plan Policy LP2	1
Inappropriate development for this sensitive area.	13
Does not comply with Houghton and Wyton Neighbourhood Plan anti-coalescence policy (as evidenced by comments from the Landscape assessor appointed by H&W PC).	38
No amenities proposed (no shops or community centre).	4
Creates an increase of over 25% to the size of the village.	13
Concerns over the mosaic of pathways within 'the gap' and play area within the gap, which leads to urban sprawl and ribbon development.	3
Building too close to Houghton Road that results in ribbon development which fundamentally changes the entrance to the site and gateway to St Ives.	19
The number of dwellings should be reduced to 48, as suggested by the Parish Council.	1
No demand for housing or development in the local area (noting existing properties are not selling).	5
There is no access to the village except via the A1123, therefore residents and school children will have to walk along the main road, thicket path or travel by car.	1
No direct, complete or safe cycle link between Huntingdon and St Ives.	3
Site is not in a sustainable location given the reduction in bus services along the A1123.	1
Noise disturbance.	2
Air pollution.	5
Contamination on the site (hazardous waste, infectious and toxic chemicals and radioactive waste which could well be still under this area).	1
Traffic pressures and congestion along the A1123, which is already over capacity.	92
Proposals are based on old traffic survey data, which raises road safety issues.	2
Impact on existing services (hospitals, schools, doctors and dentists).	58
St Ivo school is very large and already full	3
Houghton village currently lacks sufficient amenities to support a large influx of new residents.	1

Impact on sewerage capacity, noting that the wastewater treatment plan is already over- capacity.	12
Increased flooding in the locality.	60
Contamination of the River Great Ouse.	4
Impact on biodiversity and existing wildlife - deer, small mammals and birds.	20
Loss of mature trees in the area over the last 17 years (which were not adequately protected).	1
Concerns regarding securing biodiversity net gain in perpetuity (no transparent S106 agreement process).	1
Increased pedestrian and cycling traffic along the Thicket Footpath put the SSSI meadow, the CWS and the River Great Ouse (CWS) under more pressure.	5
Impact on the Great Ouse Valley (noting it is a Green Infrastructure Priority Area) and its future designation as a landscape of value / AONB.	17
Need to include more social housing (which the PC could manage – which to date, HDC has resisted).	1
The topography of the site means there will be runoff down the hill, through sensitive, important habitats.	1
Proposals do not fully assess the impact on nearby Conservation Areas.	2
Need for smaller properties (not large 4-beds) and that housing should meet local need.	6
Development should not be more than 2.5 storeys high and the heights need reducing.	4
Limited recreation space provided.	1
The ‘gap’ should be planted with woodland.	1
Undermines the quality and value of the current development at Houghton Grange (Shelborne Estates).	21
Visual impact (homes up to 10m tall far too close to the frontage of the site) which effects the visual amenity of the gateway into St Ives, along with views from Hemingford Meadow.	16
Detrimental to views and out of Houghton Hill which forms the backdrop to the Great Ouse Valley.	2
All homes should be fixed with solar panels and heat pumps.	6
Insufficient time to respond to the application proposals.	22
Loss of outlook for residents at Slepe Meadow.	1
Concerns relating to the pathways and how these connect to The Spires development (impact on amenity for existing residents).	1
Legal searches when purchasing on the Shelbourne Estate did not reveal these proposals	2
Will reduce the value of homes in the local area.	3
Very limited communication from Homes England with residents (in the face of local opposition).	11
Ignores H&W PC’s proposals for the site (which includes setting up a CLT).	2

Resubmission only has minor cosmetic changes that fail to address the core concerns previously raised.	3
Loss of the second and important play area (LEAP).	1
Additional sports and recreation facilities required on site.	2
Error in the amended parameter plan: The Thicket footpath and that across the CWS are legally footpaths and not cycle/ pedestrian routes. The parameter plan makes a distinction between proposed pedestrian routes and proposed cycle/pedestrian routes; this distinction should also be made in respect of the existing footpaths.	1
Other recent applications in the local area have been refused on grounds of impacts to the Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area; this equally applies to this site.	2

6.2 Full copies of all comments received can be viewed on **Public Access.** The key objections therefore raised by local residents are as follows:

- That the density of the development is too high and much higher than other developments along Houghton Road.
- The proposals do not comply with Houghton and Wyton Neighbourhood Plan anti-coalescence policy.
- The proposals do not comply with HDC Local Plan Policy SI1 (by exceeding the site allocation and as no masterplan has been submitted).
- That the gap between Houghton and St Ives is too narrow and does not maintain a 'substantial band of green space'.
- Concerns that Houghton will become a satellite of St Ives and will lose its identity.
- The proposals result in overdevelopment of the site.
- The impact on biodiversity and existing wildlife.
- The impact on existing services (hospitals, schools, doctors and dentists).
- Traffic pressures and congestion along the A1123, which is considered to already be over capacity.
- Concerns that the proposals undermine the quality and value of the current development at Houghton Grange (Shelborne Estates).
- The proposals will result in increased flooding in the locality.

6.3 1 comment of support has been received in respect of the principle of building 120 dwellings on this site.

6.4 Objections have also been received from the local MP who has noted the concerns locally regarding the proposal to build on the site, as well as the number of homes proposed, and that local residents have been vocal in their opposition to the plans. Objections have been raised on the following issues:

- Concerns relating to the 10% tolerance on property numbers and how this has been applied in the absence of a detailed masterplan for the site. Considers that without this there is no transparency or scrutiny regarding the justification for these additional units, which are considered unnecessary.
- Considers that the proposed scale and density of the development directly contradicts LP2 of the Huntingdonshire Local Plan, which aims to "protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside".
- Notes that the gap between Houghton and St Ives plays a crucial role in maintaining the rural identity of both and that if this development is approved, the two settlements will lose their distinctiveness and risk becoming indistinguishable from one another.
- Concerns that as a small settlement, Houghton and Wyton's unique character will be severely impacted by a development of this scale and that the proposed density will irrevocably harm the local environment, contrary to the protection offered under LP9.
- Considers that the current design proposal introduces a much higher housing density than what is seen in nearby developments or within Houghton and Wyton, noting that this would create a discordant and visually unappealing environment that fails to integrate with the existing character of the area.
- Concerns that the proposals do not address crime prevention or security, noting that this is particularly troubling given the comments from Cambridgeshire Constabulary (dated 07/10/24), which highlights the need for these issues to be considered.
- No master plan has been provided for the broader St Ives West area. As a result, key elements like site integration, property density, and urban design have not been sufficiently considered, in direct violation of policy SI 1 of the Local Plan.
- The proposal fails to maintain a sufficient sense of separation between Houghton Grange and The Spires. Notes that the plans do not respect the separation requirement stipulated in the Local Plan, which is essential to preserving the character of both developments.
- Raises concerns that the increase from 88 to 120 homes significantly encroaches on the visual and physical separation between Houghton, Wyton, and St Ives, which undermines the core principle of the HWNP to prevent coalescence and protect the distinct identities of these settlements.

6.5 Whilst not raising any material planning reasons, Cllr Dew and Cllr Keane as Ward Members both called the application to DMC for consideration (comments received 22.05.2023). In accordance with the Scheme of Delegation this application already requires

referral to DMC so no further clarification on reasons for the call in have been sought.

7. ASSESSMENT

7.1 When determining planning applications, it is necessary to establish what weight should be given to each plan's policies in order to come to a decision. The following legislation, government policy and guidance outline how this should be done.

7.2 The development plan is defined in Section 38(3)(b) of the 2004 Act as "*the development plan documents (taken as a whole) that have been adopted or approved in that area*".

7.3 As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6); reiterated within the NPPF (2024) at paragraph 2) "*If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise*".

7.4 The Town and Country Planning Act 1990 (Section 70(2)) states that "*In dealing with an application for planning permission or permission in principle the authority shall have regard to —*
(a) the provisions of the development plan, so far as material to the application,
(b) any local finance considerations, so far as material to the application, and
(c) any other material considerations."

7.5 In Huntingdonshire the Development Plan (relevant to this applications) consists of:

- Huntingdonshire's Local Plan to 2036 (2019)
- Houghton and Wyton Neighbourhood Plan (2018)
- Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)

7.6 Within Guidance on Plan Making the PPG (Paragraph: 072 Reference ID: 61-072-20190315) states that "*The requirement to review local plans at least every 5 years, does not apply to neighbourhood plans. However, individual policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a plan that is adopted after the neighbourhood plan becomes part of the development plan*. *In these cases, the more recent policy takes precedence…"* In this instance, the Local Plan to 2036 was adopted after the Neighbourhood Plan. The position is also reiterated within PPG guidance on Neighbourhood Planning where paragraph 044 Reference ID: 41-044-20190509 states "*Should there be a conflict between a policy in a neighbourhood plan and a policy in a local*

plan or spatial development strategy, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan."

7.7 The statutory term 'material considerations' has been broadly construed to include any consideration relevant in the circumstances which bears on the use or development of the land: Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor [2011] EWHC 97 (Admin); [2011] 1 P. & C.R. 22, per Lindblom J. Whilst accepting that the NPPF does not change the statutory status of the Development Plan, paragraph 2 confirms that it is a material consideration and significant weight is given to this in determining applications.

7.8 The main issues to consider in the determination of this application are:

- Background information
- Principle of Development
- Landscape and Visual Impacts
- Design and Character of Built form
- Housing Mix
- Impacts on Trees
- Heritage Impacts
- Highway Safety and Transport Impacts
- Impacts to Residential Amenity
- Biodiversity and Geodiversity
- Drainage and Flood Risk
- Land Contamination
- S106 Considerations
- Other Matters

BACKGROUND INFORMATION

7.9 In respect of relevant background information, the Inspector's report and findings on the Huntingdonshire Local Plan to 2036 (2019) in relation to St Ives West noted that:

147. The site at St Ives West (SI1) is allocated for approximately 400 homes along with social and community facilities and a significant amount of green space. It occupies a sensitive location between the western outskirts of St Ives and the east of Houghton and Wyton and is subject to a number of constraints. There is a complex planning history to the site with a number of planning applications and planning permissions. The eastern part of the site (The Spires) has planning permission for residential development (184 dwellings) and is currently under construction with 48 dwellings completed by the end of 2017/18.

148. The site allocation will make a significant contribution to the housing needs of the District and will be important in sustaining

the role of St Ives in line with the overall spatial strategy and within the context of the constraints to growth in the town that exist.

149. Policy SI1 sets out appropriate criteria which will be effective in guiding development on the site and ensuring a co-ordinated approach. It will also ensure that issues relating to the potential adverse impacts of development are addressed effectively and appropriate infrastructure and mitigation is put in place. In particular, criterion g), the indicative illustration on page 206 of the Local Plan and the requirement in Policy SI1 for approximately 23ha of green space, give adequate safeguards in relation to the maintenance of a sense of separation between developments at Houghton Grange and The Spires whilst providing for some flexibility in terms of the layout of development. They provide a sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected.

150. There are some issues to resolve in terms of bringing different elements of the site forward for development. However, there is clear and definite interest in doing so and good progress has been made at The Spires. I am satisfied that the site overall is deliverable and that the timescales and rates of development set out in the Council's housing trajectory are realistic.

7.10 Within the development guidance section of the Local Plan allocation SI 1, it notes at paragraph 11.3 that this "*is a complex site which contains a number of constraints and will require a sensitive approach to development*" and at paragraph 11.9 it sets out that "*Housing development should be predominantly situated in the northern part of the site and arranged in a series of clusters separated by green corridors running north-south through the site both to screen and separate areas of development and to connect through to the greenspace in the south of the site."*

7.11 Policy HWNP3 of the Houghton and Wyton Neighbourhood Plan is entitled 'Anti-coalescence'. This policy seeks to "*define and protect those areas of land responsible for delivering both the actual and perceived anti coalescence of village and town as experienced from road, footpaths, meadow or river*" (paragraph 5.14) and "*help to protect the special character of Houghton and Wyton which has a clear and distinct identity as a village from that of St Ives as a market town*" (paragraph 5.16). Within the justification to the policy it is recognised that this site occupies the only undeveloped frontage adjoining the A1123, which also runs south to the Thicket Wood.

7.12 Reflecting this policy on anti-coalescence, part g. of the site allocation SI1 requires "*a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network…and maintaining a sense of separation between developments at Houghton Grange and The Spires*". In addition, the development guidance to SI 1 at paragraph 11.9 states that a

"substantial band of greenspace should be retained through the portion of the BBSRC field to the east of the derelict buildings and up to the western edge of the residential development at 'The Spires'". The allocation is also supported by an indicative illustration which shows how development of the area could take place (paragraph 11.4).

PRINCIPLE OF DEVELOPMENT

7.13 The presumption in favour of sustainable development is clearly outlined within the NPPF, with the goal of creating positive improvements in the quality of the built, natural and historic environment, which includes widening the choice of high-quality homes.

7.14 Policy LP1 of Huntingdonshire's Local Plan to 2036 sets out the amount of development the Local Plan seeks to address having regard to the objectively assessed need for development in Huntingdonshire. The Strategy for Development at paragraph 4.4 of the Local Plan confirms that allocated sites are included to promote the deliverability of the strategy.

7.15 St Ives is classified in policies LP2 and LP7 as a Spatial Planning Area (SPA), as one of the district's traditional market towns and most sustainable centres. Collectively, LP2 anticipates that Huntingdonshire's Spatial Planning Areas will deliver approximately three quarters of the objectively assessed need for housing and the majority of employment and retail growth will be focused in SPA's.

7.16 As noted, the application site is included within the wider site allocated under St Ives West SI 1 'St Ives West' of the adopted Local Plan to 2036. Allocation SI 1 relates to 54ha of land within the parishes of St Ives and Houghton and Wyton and allocates a mix of uses to comprise:

1. approximately 23ha of green space;
2. approximately 400 homes; and
3. social and community facilities to meet needs arising from the development.

7.17 The St Ives West Policy (SI 1) lists a number of requirements that successful development of the site will require which include:

a. completion of a detailed master planning exercise to be agreed with the Council
b. design codes or conceptual appearance of development proposals
c. phasing of development, including the provision of green space
d. appropriate access via the Houghton Road/ Garner Drive junction and Knights Way

e. assessment of the surrounding road network and measures to address identified inadequacies that would come about as a consequence of development of this site
f. a sustainable transport network for pedestrians, cyclists and vehicles across the site to be integrated with the wider network
g. a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires
h. social and community facilities appropriate to the scale of development
i. sustainable drainage systems
j. enhancement and provision for habitats in accordance with an ecological strategy
k. production of a management plan for all areas of green space
l. safeguarding and enhancing the character, appearance and setting of the conservation areas and the grade II listed Houghton Grange and the two lodges

7.18 Allocation site SI 1 includes three other developments as well as this application site: The Spires to the east, The How to the east and south east, and Houghton Grange (phase 1) to the west.

7.19 As noted, the Local Plan allocation is supported by an indicative illustration which shows a form of development which could address the opportunities and constraints of the site, but this is indicative only and each application is to be assessed on its own merits against the policies in place.

7.20 In respect of assessing the application against the principles of Policy SI 1, part 1 criterion 1 of the site allocation states that approximately 23ha of green space should be provided. The current application proposal provides for 16.84 ha of green space and in combination with the green space at Berman Park and The How this amounts to 26.4 ha across the wider St Ives west site allocation, which exceeds the requirement for "*approximately 23ha of green space*" set out in part 1, criterion 1 of Policy SI 1; thus part 1 of the site allocation has been addressed.

7.21 In relation to part 1, criterion 2 of the SI 1 allocation, the planning history for the adjacent sites as listed at paragraphs 4.2 - 4.5 of this report sets out that consent has been granted for 305 new dwellings as part of St Ives West (noting there have also been some replacement dwellings for historic residential units on the Houghton Grange site).

7.22 A number of comments and concerns have been received relating to the quantum of dwellings and this application exceeding the Local Plan allocation. Policy SI 1 allocates "*approximately 400 dwellings*". The introductory text to 'Section D: Allocations' in the Local Plan confirms at para. D.8 that there "*is scope for variation*

in the proposed numbers through the planning application process and it is expected that in many cases higher capacities may be achieved on sites as a result of individual design processed." The text continues that a "*10% tolerance either side of the approximate figure set out is considered to be reasonable*" although, where a number outside of this variance is proposed, it does also allow for justification through the Design and Access Statement.

7.23 In terms of the current application proposals for (up to) 120 dwellings, the total number of dwellings would fall within the 10% tolerance referred to in the Local Plan (it would bring the total number across the allocation to 425 which is less than 440 dwellings with the 10% tolerance), thus it is considered that the amount of development sought complies with part 1 criterion 2 of the SI 1 site allocation when the Local Plan wording around the allocations is applied.

7.24 In relation to part 1 criterion 3 of the SI 1 allocation, no social and community facilities have been provided directly on the wider allocated site or are proposed as part of the current application proposals. However, financial contributions have been secured by previous applications across the site allocation towards facilities and contributions are recommended to be secured pursuant to this current application, which include education, libraries, health and outdoor sports facilities.

7.25 In respect of the SI 1 (St Ives West) allocation criteria (a) – (l):

a. It is acknowledged that no detailed master planning exercise has been completed for this site allocation. However, given the planning history to the site whereby consent was granted for the Barratt Homes scheme ahead of the adoption of the Local Plan, and given the planning history to the Houghton Grange phase 1 site which also had outline consent ahead of the Local Plan adoption, there has not been a chance to undertake a master planning exercise. The current planning application is the final element of the site allocation to come forward, thus it is too late to undertake detailed master planning at this stage. The current proposals do take into account the developments that have been granted planning permission to date and the submitted parameter plan ensures that links into these have been fully considered and will be secured (final details to be considered at reserved matters stage, if outline consent is granted). The lack of a masterplan for the whole site does not prevent comprehensive and appropriate development of the site, especially when the Local Plan is supported by an indicative illustration designed to guide development in the same way as a masterplan and give an overall vision and comprehensive indication of the intention for development of the site in a holistic manner, despite the submission of separate applications. This has allowed planning decisions to be guided by not only the policies, but also the overall illustrative vision for the site.

b. No design code or conceptual appearance of development proposals have been prepared. This is a result of no site wide master planning having taken place. However, an acceptable Parameter Plan has been submitted as part of this outline submission (along with an Illustrative Masterplan) and detailed design will be considered at reserved matters stage.
c. In relation to the phasing of development (including the provision of open space) the Barratt Homes development delivered Berman Park and The How proposals have secured further strategic green space land; these areas, alongside existing HDC owned land at The Thicket will link up with the application site to deliver a substantial area of publicly accessible greenspace. The SI 1 allocation has therefore been delivered in a phased arrangement, with the provision of green space linking to the various permissions granted so far.
d. In respect of access via Houghton Road/ Garner Drive junction and Knights Way, the traffic light junction along Houghton Road and access road to the current application site has already been constructed and CCC highways have raised no objections to the proposals, subject to conditions.
e. A detailed assessment of the surrounding road network has been undertaken, as detailed later in this report. CCC highways have confirmed that there are no objections to the proposals subject to conditions. The current application proposals are supported by a detailed Transport Assessment and a Framework Residential Travel Plan, which the CCC Transport Assessment team have reviewed and have raised no objections to.
f. The submitted Parameter Plan illustrates a variety of footpaths and cycleways for future residents, which link in with the Knights way development, the Spires development, The How, the Houghton Grange phase 1 proposals and down towards the Thicket. These will create a sustainable transport network linking the wider SI 1 allocation site to Houghton & Wyton, St Ives, and the wider area.
g. The current application is supported by a detailed LVA, as considered later in this report. The wider site SI 1 allocation has been developed taking into account existing vistas, boundaries and green infrastructure and the A1123 tree lined approach has been retained along this stretch as part of the Houghton Grange phase 1 proposals. The current proposals include new tree planting along the boundary with the A1123 to help maintain the sense of separation between developments at Houghton Grange and The Spires, as required by policy. Further details are set out later in this report.
h. As noted earlier, whilst no social and community facilities have been provided directly on the wider site or are proposed as part of the current application proposals, financial contributions have been secured across the SI 1 site allocation towards facilities which include education, libraries, health and outdoor sports (which will include contributions secured as part of this current application).

i. In respect of sustainable drainage systems, the wider site allocation has delivered a large new SUDS pond as part of Berman Park and a further drainage pond is proposed as part of the current application proposals.
j. The current application proposals deliver a clear and significant biodiversity net gain. TPO protected trees have been incorporated successfully into the wider site allocation (as well as the current application proposals), and the Houghton Grange County Wildlife Site will be enhanced through future restoration proposals. Taken as a whole across the wider SI 1 allocation and the green space that has been secured, habitats have clearly been enhanced and each application (including the current submission) has been supported by appropriate ecological reports and follow up surveys where required, albeit no site wide ecological strategy has been prepared.
k. The green space secured as part of The Spires development delivered Berman Park which was secured through the S106 Agreement as a 100 year lease to the District Council, which is to be managed and maintained by the HDC Operations team. A formal offer of strategic green space associated with land to the south of The How has also been made; if the District Council take ownership this can then also be successfully managed by the HDC Operations team. The green space associated with the current application will include a cascade within any S106 agreement, with the offer for the transfer of this land first being made to the District Council, so that one large publicly accessible area can be successfully managed by the District Council. A requirement for a management plan for all areas of green space on the application site can be secured through the S106 agreement, which will ensure that these open space enhancements are preserved for generations to come.
l. The character, appearance and setting of the adjacent conservation areas and the Grade 2 listed Houghton Grange and two lodges (along with the How listed building and curtilage listed gate lodge) have all been successfully integrated into the development on the wider SI 1 allocation to date. Heritage statements have been prepared for all the applications to date, including the current proposals.

7.26 In respect of relevant Houghton and Wyton's Neighbourhood Plan Policies, Policy HWNP1 'Houghton and Wyton built up area' states:

"The built up area boundary for Houghton and Wyton is shown on Figure 3 above. A built up area is defined as a distinct group of 30 or more homes and their immediate surroundings. Other areas outside the built up area are part of the open countryside. Proposals for development within the built up area will be guided by the relevant Neighbourhood Plan policies and other policies in the development plan. Proposals for development outside of the defined built up areas will be acceptable where they comply with relevant policies for building in the countryside."

7.27 It is noted that the application site is not shown within Figure 3 in the Houghton and Wyton Neighbourhood Plan as being within the built-up area of the village.

7.28 Houghton and Wyton's Neighbourhood Plan Policy HWNP3 'Anti-coalescence' states:

"Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements, or would lead to their coalescence."

7.29 There is a tension between the Houghton and Wyton Neighbourhood Plan's aim of preventing coalescence and the fact that approximately 400 houses are allocated to the west of St Ives in the Local Plan. The H&WNP accepts that the Local Plan, which was emerging at the time the NP was written, would make the decision about where exactly they would be located. The application site subsequently became part of allocated site SI 1 in Huntingdonshire's Local Plan to 2036. As noted above, as the tilted balance is engaged, Policy HWNP1 is given no weight and Policy HWNP3 is given significantly reduced weight in the determination of this application.

7.30 Comments from third parties have been received which refer to the application site being within the countryside and the proposal therefore being contrary to Policy LP10 (The Countryside) of the Local Plan and Policy HWNP1 of the Houghton and Wyton Neighbourhood Plan. As acknowledged above, the site is outside of the built-up area within the Neighbourhood Plan, however this pre-dates the Local Plan policies and is therefore considered to have no weight as it has been superseded by the site allocation SI 1. Under the Local Plan, the definition of the St Ives Spatial Planning Area refers to including the built-up areas of parts of adjacent parishes (including Houghton and Wyton) where the built up area or St Ives extends into them and / or where development is allocated in the plan. Site allocation SI 1 expressly includes land within the parish of Houghton and Wyton and states that once developed, parts of the site that comply with the Built-up-Areas definition will form part of the relevant built-up area. It is therefore not considered that policies LP7 (Development Proposals on Unallocated Sites) and LP10 (The Countryside) are applicable policies for the consideration of this application. These policies help steer unallocated development proposals as is made clear in the supporting text (reasoning) notes to Policy LP7 (paragraph 4.88). As such, the site allocation policy SI 1 is considered to be the appropriate policy for the determination of this application.

7.31 The site is therefore an allocation (SI 1) within the Local Plan which has established the principle of the proposals in this location, and it is therefore considered the principle of residential development is acceptable in accordance with Policy SI 1. The proposal therefore falls to detailed considerations on other matters within the following sections.

LANDSCAPE AND VISUAL IMPACTS

7.32 The application site is located on a ridge of higher ground to the north of the River Great Ouse; the north western corner of the site is the highest point at approximately 35m AOD and the northern half is broadly flat. A belt of trees extends from the eastern boundary, towards the centre of the site, and from here the land falls southwards towards St Ives Thicket and the Ouse Valley Way long distance path, with the Great Ouse flood plain beyond (approximately 20m AOD). The boundaries of the site are largely lined by mature shrubs and trees and the site contains significant trees of different species covered by Tree Preservation Order 015/91; these are of importance to the site and contribute to the wider landscape.

7.33 The land is predominantly pasture, surrounding two discrete areas of hardstanding. Large-scale institutional, agricultural and industrial buildings (Houghton Poultry Research Station) have been demolished on the site in recent years.

7.34 There are a number of Development Plan policies relevant to landscape and visual matters which seek to ensure that developments respond to their context and contribute positive to an areas character and identity. These are Policies LP2, LP3, LP11, LP12 and LP31 of Huntingdonshire's Local Plan to 2036 and Policies HWPN3 and HWNP17 of Houghton and Wyton's Neighbourhood Plan.

The Huntingdonshire Landscape and Townscape Assessment SPD

7.35 In addition, the Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document 2022 (HLTASPD) is a material consideration and identifies nine Landscape Character Areas (LCAs). It also provides an urban character assessment of five market towns within the district, including the St Ives Spatial Planning Area, within which it identifies thirteen individual character areas (CAs). The application site is located within the St Ives Character Area: Western Periphery (SICAWP, Area 11), and adjacent to the Ouse Valley Landscape Character Area (OVLCA).

Local Nature Recovery Strategy and the Nature Recovery Network for Huntingdonshire

7.36 With the introduction of the Biodiversity Net Gain (BNG) and Local Nature Recovery Strategy (LNRS) requirements into the Environment Act 2021, Huntingdonshire District Council's Biodiversity for All project commissioned a report by the Bedfordshire, Cambridgeshire and Northamptonshire (BCN) Wildlife Trust (September 2023), to aid the Council with its approach to these new areas of work. This report is called the Nature Recovery Network for Huntingdonshire (NRNH). The NRNH identifies evidence-led priority landscape areas for large-scale, strategic biodiversity and landscape enhancement in Huntingdonshire; this information informs the statutory Local Nature Recovery Strategy and wider place-shaping strategies and funding streams.

7.37 Local nature recovery strategies propose actions which are intended to help nature and improve the wider natural environment. The Local Nature Recovery Strategy is a County wide piece of work that is being developed by Cambridgeshire County Council who will be undertaking the work on behalf of the Cambridgeshire and Peterborough Combined Authority. The report was formally recognised by HDC at a Cabinet meeting on 15th October 2024 and a Council meeting on 16th October 2024 where it was resolved, amongst other criteria "*to inform the response to and engagement with the development of the Local Nature Recovery Strategy and subsequently future Planning Policy*". Therefore, whilst not forming part of the adopted Development Plan this document represents a relevant material consideration in the determination of this planning application.

7.38 Within the NRNH 'Priority Landscapes of Huntingdonshire' are identified which include the Great Ouse Valley Priority Area (GOVPA). Whilst the GOVPA lies outside the application site, it is immediately adjacent on its southern boundary. It should be noted that the recognition of Huntingdonshire's Priority Natural Landscapes is not designed to inhibit the development and growth of the district, but support it by complementing the vision of the Huntingdonshire Futures strategy.

Landscape and Visual Appraisal

7.39 The application is supported by a Landscape and Visual Appraisal (LVA), which has been updated during consideration of the proposals and provides an assessment of the likely landscape and visual effects resulting from the proposals:

- Landscape effects relate to changes to the landscape as a resource, including physical changes to the fabric or individual

elements of the landscape, its aesthetic or perceptual qualities and landscape character.

- Visual effects are closely related to landscape effects, but concern changes in views and visual amenity experienced by people living, visiting or working (receptors) within the study area.

7.40 The LVA was first updated in early 2024 in response to comments to include: updates to the Parameter Plan; winter photography, updated photomontages; an extension of the ZTV to 5km radius; updates to Landscape and Townscape character areas and updates to the assessment section of the report.

7.41 The LVA was then further updated in December 2024 to reflect adjustments to the site design. This included updates to certain Figures, a re-run of ZTVs, updates to photomontages, and updates to the assessment section. All updates are written in different colours in the document for clarity.

7.42 The Revised Landscape and Visual Appraisal is dated January 2025; this is available to review through Public Access.

7.43 The LVA sets out the likely landscape and visual effects in relation to the application proposals during construction, year 1 and year 15 of operation. The assessment for construction and year 1 operation have been undertaken for winter conditions, when vegetation is not in leaf, and therefore there would be greater perception and visibility of the proposals, representing a worst-case scenario. The assessment for year 15 operation has been undertaken for summer conditions, when vegetation is in leaf, to present the remaining effects after the proposed mitigation planting has established.

7.44 The LVA sets out the susceptibility and sensitivity for both the landscape character areas and visual receptors.

7.45 In terms of landscape effects during construction, in relation to the likely effects on the LCAs, the LVA states that there would be moderate adverse effects for a short duration for part of the Western Periphery LCA, minor adverse effects relating to the Great Ouse Valley LCA and for the remaining LCAs (Central Claylands, Central Expansion and Bridgefoot and London Road LCAs) there would be no direct effects.

7.46 In respect of visual effects during construction, the LVA concludes that these range from neutral to moderate adverse effects, with only four of the receptor groups identified experiencing adverse effects.

7.47 In terms of landscape effects in relation to operations in year 1, the LVA notes that there would be minor adverse effects relating to the Western Periphery LCA where the development is located, but

that once the proposals are operational, perceptual effects on the setting of the Central Claylands, Great Ouse Valley, Central Expansion and Bridgefoot and London Road LCAs would diminish as the proposals would appear within the settlement context of St Ives. In respect of the year 1 visual effects, the LVA concludes that the effects will range from neutral to moderate adverse (with the same groups identified as those most affected as during the construction stage).

7.48 In relation to operations in year 15 the LVA notes that the planting to mitigate the effects of the proposals would have established to help enclose the site and screen and filter views of the proposals, particularly in close distance views. Year 15 effects are set out within the LVA as follows:

Receptor	Sensitivity	Magnitude of impact	Operation Effect (summer year 15)
Landscape Character			
Central Claylands LCA	Low	None	Neutral
Great Ouse Valley LCA	High	None	Neutral
Western Periphery CA	Medium	Very Low	Negligible
Central Expansion CA	Low	None	Neutral
Bridgefoot and London Road CA	Medium	None	Neutral
Visual Receptors			
People walking on footpath 132/10 south of the site	Medium	None	Neutral
People walking on footpath 132/8 within the southern part of the site	Medium	Very low	Negligible
People walking on informal path within the southern part of the site	Medium	Low	Minor adverse
People travelling on the A1123 Houghton Road and residents of Garner Drive	Medium	Medium	Minor adverse
People traveling on the B1090	Low	None	Neutral
Residents of The Spires	Medium	None	Neutral
People walking across Hemingford Meadow, south of St Ives	High	None	Neutral
People walking across Houghton Meadow	High	None	Neutral

People walking across Hemingford Meadow	High	None	Neutral
Residents of Hemingford Grey, north	Medium	None	Neutral
Residents of Hemingford Grey, south	Medium	None	Neutral
People travelling on London Road	Medium	None	Neutral
People travelling on A1096 Harrison Way	Medium	None	Neutral
Residents south of RAF Wyton	Medium	None	Neutral
Recreational users Fen Lane Public Right of Way	Medium	None	Neutral
Road users travelling north along Connington Road	Low	None	Neutral

Comments received in respect of landscaping matters

7.49 Concerns have been raised by members of the public and by the Town and Parish Councils that the proposed development would significantly harm the landscape of the Great River Ouse valley. However, it is noted that the Ouse Valley is not currently subject to any statutory landscape designation.

7.50 H&W PC have submitted four landscape & visual consultant reports during the consideration of the application as part of their formal comments, as follows: (i) a Review of the Applicant's Landscape and Visual Appraisal dated June 2023, (ii) Implications for Separation between Houghton and St Ives dated June 2023; (iii) a Review of the Applicants revised LVA dated October 2024; and (iv) a Review of January 2025 Landscape and Visual Appraisal dated February 2025. These reports are enclosed with this DMC report as part of H&W PC's comments on the proposals.

7.51 The H&W PC report titled 'Implications for separation between Houghton and St Ives' (June 2023) concludes that despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds). This report also notes that the openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St Ives to the north and the vegetated frontages to Houghton Grange and The Spires, and that it is also seen in views from the southern part of the site.

7.52 The report states that whilst built development would occupy only approximately 22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road; as a result the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open

land around 100- 150m wide adjacent to The Spires. The report notes that the visualisations in the LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road and would introduce a developed skyline into views from the southern part of the site. It should be noted that since receipt of this report in 2023 the LVA visualisation from Houghton Road has been updated following amendments made to the Parameter Plan, which reduces the scale (height) of development along the road frontage.

7.53 The June 2023 report also notes that the resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins, which is contrary to the Neighbourhood Plan HWNP3, as well as that the application proposals are at variance with the principles illustrated in Local Plan Policy SI 1, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint. The H&W PC report also states that the development would encroach into open countryside and have a further urbanising influence on the locality, contrary to the Neighbourhood Plan HWNP1, Local Plan policy LP10 and the NPPF 174(b). The report concludes that the Parish Council's concerns about the implications for coalescence and further urbanisation are therefore considered to be justified.

7.54 Comments received from H&W PC on 22 October 2024 included a report prepared by Mr Peter Radmall titled 'Review of Applicant's Revised LVA, October 2024' where it was stated that four concerns remained, including:

- The value of the landscape, particularly with relevance to local conservation areas and the highly sensitive Great Ouse Valley, may have been under-stated;
- The LVA's focus on published character areas has been at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
- There are unexplained variations in the sensitivity of visual receptors; and
- The site's contribution to local character and to separation between the village and St Ives has not been recognised.

7.55 This October 2024 report concludes that as a result the LVA may have understated some of the predicted effects, including the degree to which the development would increase the actual and perceived sense of coalescence between Houghton and Wyton and St Ives.

7.56 Alongside comments received from H&W PC on 28 February 2025 was a further document 'Review of January 2025 Landscape and Visual Appraisal (LVA), February 2025' which states that the most significant change to the parameter plan occurs in the character of

the green corridor with the introduction of a children's play area and additional paths. The report considers that this would result in the existing rural appearance of the meadowland taking on a more suburban character and that as such, there would be a reduction in separating function of the site as a green space to a material degree both spatially and visually meaning there would be little perceived break in the westward extension of the urban fringe of St Ives along the southern side of Houghton Road. It should be noted that following receipt of these comments the Parameter Plan has been amended by the applicant to remove the children's play area from the green corridor and the pathways have been reduced.

7.57 The 'Review of January 2025 Landscape and Visual Appraisal (LVA), February 2025' report states that concerns remain as unaddressed, as follows:

- The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;
- The site's representativeness of/ contribution to the published LCAs/CAs has not been fully assessed;
- The Conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors;
- There was no explicit consideration of whether the site may form part of a valued landscape;
- In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful;
- The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered;
- Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable; and
- The LVA does not assess the latest version of the Parameter Plan.

7.58 The report concludes that no explicit response has been made to most of the concerns remaining from the Second LVA review ('Review of Applicant's Revised LVA, October 2024').

7.59 As a result of the above, H&W PC consider that there are outstanding 'deficiencies' in the submitted LVA which they consider means that the conclusions within the LVA cannot be relied upon.

Landscape and Visual Appraisal Review

7.60 The LVA and its revisions have been assessed independently by a Landscape Consultant engaged by the Local Planning Authority. Expert Landscape Consultancy have provided responses in April 2024, November 2024 and June 2025. These are enclosed as part of the appendices of this DMC report.

7.61 The April 2024 review confirms that the assessment of the landscape and visual effects in the revised LVA is fair.

7.62 In respect of Policy SI 1 of the Local Plan and Policy HWNP3 of the Neighbourhood Plan, the April review prepared by Expert Landscape Consultancy concludes:

"4.1 The application site is within allocated site SI 1. It is the last of a series of developments within that allocation and is located on a field previously associated with the research facility at Houghton Grange. There are conflicting views on whether Houghton Grange belongs to Houghton and Wyton village (it is within the village CA), or to the new western periphery of St Ives (HLT SPD). I consider that the Houghton Grange site now reads as part of St Ives due to:

• The change in character to the Houghton Grange site as a result of the Houghton Grange Phase 1 development, including the access road across the application site ;
• The spread of development from the edge of St Ives on both sides of Houghton Road; and
• Road widening and associated traffic lights.

4.2 The Houghton and Wyton NP Policy HWNP3 seeks to retain the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. The NP considers that the field in which the application site is located makes a significant contribution to this separation. I consider that for the reasons given above the field no longer has a significant role in retaining the individual and distinct identities of the settlements and that the perception of a change in character now begins west of Houghton Grange Phase 1. I do not consider that the application proposals will affect the individual and distinct identities of the settlements.

4.3 The St Ives West (SI 1) allocation in the 2019 Local Plan requires that a sense of separation is maintained between developments at Houghton Grange and The Spires. This sense of separation is important in maintaining an appreciation of the open landscape of the Great Ouse Valley to the south from Houghton Road and providing attractive access to it. That sense of separation would be more clearer defined if the development did not extend as far to the east and if a pinch point with The How Development was relaxed."

7.63 In November 2024, Expert Landscape Consultancy commented on amendments to the Design and Access Statement (and LVA), namely:

- Changes to the Houghton Road frontage;
- Changes to the eastern edge of the development;
- Changes to the development footprint; and
- Changes to public open space (POS) within the development.

7.64 The conclusion was that the amendments to the application are welcomed from a landscape and visual perspective. Expert Landscape Consultancy commented that it would be desirable if:

- *"The height restriction to 8.5m was extended west of the access road and therefore encompassed the whole of the Houghton Road frontage; and*
- *More detail was provided with regard to the location and character of the 'Green Avenue' within 'the eastern open space."*

7.65 In June 2025, Expert Landscape Consultancy reviewed the revised LVA (dated January 2025), the amended Illustrative Masterplan, the amended Parameter Plan and the review prepared by Mr Peter Radmall for Houghton and Wyton Parish Council titled 'A Review of the Landscape and Visual Appraisal' (dated February 2025). Paragraph 7.57 above sets out what Mr Peter Radmall on behalf of H&W PC considers to be the outstanding 'deficiencies' in the submitted LVA.

7.66 As noted, this final review of the landscape and visual documentation from Expert Landscape Consultancy is enclosed within the Appendix of this report. This review responds to each of the outstanding points in detail raised by Mr Peter Radmall on behalf of H&W PC, concluding that the LVA is adequate and that Expert Landscape Consultancy agree with the overall conclusions of the LVA.

7.67 The Executive Summary provides that (as relevant):

"Concerns have been raised by Houghton and Wyton Parish Council (PC) that the development proposed would result in coalescence between Houghton and Wyton and St Ives. I consider that the site already reads as being part of St Ives and this is reflected in the recent Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 (HDC SPD). The HDC SPD includes all of the SI 1 Allocation within the Western Periphery Character Area of St Ives.

The gap between St Ives and Houghton and Wyton is already experienced as the land between the Houghton Grange Phase 1 development, the most westerly part of the SI 1 Allocation, and the

eastern edge of Houghton. This will not change when the proposed development is in place.

The LVA submitted with the application is adequate and has assisted in the assessment of the landscape and visual effects of the development. The methodical approach adopted in the LVA is acceptable although it does not always reflect best practice. Although there has been some underestimation of effects I agree with the overall conclusions of the LVA. I consider that the landscape and visual effects of the proposed development are unlikely to represent a reason to refuse the application."

Landscape and Visual Impact Conclusions

7.68 As established above, a number of documents have been considered as part of the assessment of this application in respect of landscape and visual impact matters. Whilst the objections from H&W PC are noted, taking into account the comments received from Expert Landscape Consultancy, officers consider the submitted LVA is acceptable and that the landscape and visual effects of the proposals do not represent a reason to refuse the application.

7.69 The St Ives West (SI 1) allocation requires that a sense of separation is maintained between developments at Houghton Grange and The Spires. As detailed within the Design and Character section of the report below (see in particular paragraph 7.92) the separation gap varies in width and at its northern end it is approximately 145m wide. This sense of separation is important in maintaining an appreciation of the open landscape of the Great Ouse Valley to the south from Houghton Road and providing attractive access to it. It is considered that the sense of separation has been made more defined following receipt of amended plans. The officer's position is therefore that the application proposals will maintain a sense of separation between the developments at Houghton Grange and the Spires, in accordance with Policy SI 1 of the Local Plan

7.70 It is therefore concluded with regards to landscape and visual impacts that the proposals are acceptable and have considered the natural environment, respond to the context within which they are to sit and will create a sense of separation between the developments at Houghton Grange and The Spires. As such the proposals are considered to be in accordance with the NPPF 2024, policies LP3, LP12 and SI 1 of Huntingdonshire's Local Plan to 2036 and Policy HWNP17 of the Houghton and Wyton Neighbourhood Plan.

DESIGN AND CHARACTER OF BUILT FORM

7.71 The application site is located within the built up area of St Ives, and within the Western Periphery, as identified in the Landscape and Townscape SPD 2022. The site is largely open having been previously cleared of former buildings; it noticeably slopes down towards the south with a drop in ground levels.

7.72 It is noted that this application is in outline form and that future applications will be required with regards to the matters reserved; namely appearance, landscape, layout and scale. At this stage, however, consideration is to be had to whether the Parameter Plan and the indicative Illustrative Masterplan demonstrate an acceptable standard of design can be achieved within the development.

7.73 Following receipt of an amended Parameter Plan and Illustrative Masterplan, the HDC Urban Design Officer has raised no objections to the proposals. The officer considers that the submitted details have adequately demonstrated that the development can be accommodated in a satisfactory manner.

7.74 The Parameter Plan is detailed illustrating the background context, and key elements of the development for approval. The background context information on the plan includes the site constraints which encompass the water mains and foul water routes with their associated easements, the existing Houghton Grange Phase 1 masterplan and consented SUDs pond, vehicular access, existing and consented cycle and pedestrian routes and retained trees.

7.75 The Parameter Plan builds upon the identified site constraints with the developable area of the site for residential use, and seeks in-principle approval for a number of detailed elements which will inform future site layout including open spaces and trees, pedestrian and cycle routes, as well as building height and density.

Building heights

7.76 The scheme proposes development of up to 10m ridge height (from finished ground level) for the main part of the site, except for the perimeter edges around the south and east, and to the north along Houghton Road and the western parcel adjacent to Edith Coote Drive which are limited to 8.5m (from finished ground level) in height. The restriction of building height in these locations is intended to further reduce the impact and visibility of the proposed development when viewed from Houghton Road behind the proposed Houghton Road tree planting, and provide a softer interface with the wider open space to the south and east.

7.77 Development backing onto the tree belt along Houghton Road on phase 1 at Houghton Grange varies in height from 7.8m to

ridge, to 8.7m ridge. Across the wider development there is the inclusion of larger key buildings including 2.5 storey within ridges of 9.8m and 9.2m respectively.

7.78 Along the Slepe Meadow estate frontage onto Houghton Road opposite the application site frontage, dwellings range in height from approximately 7.8m (plot 82 on the Garner Drive / Houghton Road junction), 8.1m (plot 85 on the Garner Drive / Houghton Road junction), to 9.2m (plot 77).

7.79 There is also variation in building height on The Spires phase 1 development close to Houghton Road including 3 storey apartments with a ridge height of 10.3m on Adams Drive, with other apartments on the development of 10.7m in height. Taller 2.5 storey dwellings are located as key buildings fronting key areas of public open space within the centre of the site. The three bespoke dwellings at the southern end of The Spires development (application 19/01671/FUL) fronting Berman Park have ridge heights of 7.8m.

7.80 The How development contains some larger 2.5 storey dwellings under a monopitch roof with ridge height of 8.5m.

7.81 Whilst storey heights have not been specified on the Parameter Plan it is likely that should 2.5 storey development be proposed at a future reserved matters application, that a second floor would be included within the roof space in order to meet the heights set out on the Parameter Plan. The maximum ridge heights proposed over the development are therefore considered acceptable within the context of the site.

Density

7.82 Local residents and Houghton and Wyton Parish Council, St Ives Town Council, Hemingford Grey Parish Council and Hemingford Abbots Parish Council have objected on the basis of density and overdevelopment of the site. However, officers consider that the proposed density of the development is in line with standard densities common in Market Town developments.

7.83 In addition, when considering the density of other developments in the immediate area (calculated with the inclusion of development roads but not public open space to ensure consistency), the average density of the Slepe Meadow estate to the north of Houghton Road is 39.4 dwellings per hectare (dph). The dwellings backing onto Houghton Road on phase 1 of Houghton Grange have an average density of 16 dph, with the average density of the development east of the Lime tree Avenue (73 plots) of 26.7 dph. It should be noted however that the site constraints of phase 1 Houghton Grange are unique with the existing landscape features, trees and listed buildings, which the development layout

successfully responds to and as such the average density is lower than might be typically found on new build developments in both village and town environments.

7.84 The average density on phase 1 Knights Way (David Wilson Homes) at The Spires is 36.7 dph, with an average density on phase 2 (Barratt Homes) being 32.3 dph, with a total average of 34 dph at The Spires.

7.85 Whilst the detailed layout will fall to reserved matters stage, the submitted Parameter Plan and Illustrative Masterplan illustrate three areas within the site that would accommodate residential uses. A residential parcel is proposed to the north of Edith Coote Drive along the Houghton Road frontage, and then two parcels to the south of Edith Coote Drive, separated by a central linear area of public open space. These areas are to contain different densities and the Parameter Plan identifies that the northern part of the site adjacent to the access from Edith Coote Drive and adjacent to Houghton Road will have a density of no more than 23 dph. The Parameter Plan does not stipulate a maximum density for the remainder of the site, however based upon the number of dwellings shown on the Illustrative Masterplan on the two parcels to the south of Edith Coote Drive and their areas (excluding the central linear area of Public Open Space) and the density fix at the northern end of the site, the overall total based upon 120 dwellings would achieve an average density of 31.4 dph across the site.

7.86 It is noted that the two southern parcels are broken up by the central linear POS and whilst detailed layout matters would be agreed at reserved matters stage, the Illustrative Masterplan illustrates detached dwellings on the outer southern and eastern interface with the strategic green space, creating a soft interface and lose grain character.

7.87 The comments from Houghton and Wyton Parish Council are noted in relation to the recent Local Plan call for sites strategic land assessment criteria stating low densities of 25 dph are anticipated at edge of village locations. However the application site forms part of the existing SI 1 St Ives West allocation within the current adopted Local Plan and Local Plan Policy LP11 states that proposals will be supported where they respond positively to their context. The exercise which has been undertaken in relation to the density of adjacent developments is therefore important to note. In addition, the Local Plan call for sites assessment criteria considers densities of around 35 dph are appropriate in edge of town locations.

7.88 In considering the best use of land and the various uses and land requirements the development will need to accommodate, it is considered the proposal does not result in overdevelopment and reflects an appropriate density that has regard to the wider character and adjacent developments.

Trees

7.89 The Parameter Plan also seeks approval for the inclusion of various tree planted areas on the site. The Houghton Road frontage has two areas of tree planting proposed which will facilitate in reinstating the green backdrop to the site before the Houghton Road widening during 2011, and maintain and reinstate the green character along the southern side of Houghton Road. The tree belt to the west of the Houghton Road / Edith Coote Drive junction is proposed at depths ranging from approximately 17.4m to 21.3m. The tree planting area to the east of the Houghton Road / Edith Coote Drive junction is larger ranging in depth between approximately 40.6m to 63m and extends approximately some 85.6m to the east of the junction immediately south of Houghton Road. The proposed residential development is set behind these frontage tree areas creating a similar character of development set behind the tree and landscape character along the southern side of Houghton Road (Houghton Grange phase 1 to the west, and The Spires / Knights Way to the east), and in time views will be largely filtered from Houghton Road by the trees and landscaping.

7.90 Trees are also proposed along the eastern side of the site adjacent to plots 10-12 of The How, around the north eastern corner of the proposed SUDs pond, and a fourth area to the south of the proposed residential area and LEAP connecting the existing East -West tree belt on the eastern side of the site with the trees on the western side of the site.

7.91 A line of trees is also proposed around the outer southern and eastern perimeter edge of the residential development. Street trees within a highway verge are also proposed along both sides of Edith Coote Drive and a linear North – South row of trees are proposed within the centre of the site adjacent to the central area of public open space. Whilst the precise details of this planting will be detailed as part of the reserved matter applications, the inclusion of trees within the Parameter Plan is supported, with the proposed location of trees complementing the development and landscape setting of the site and wider landscape character of the area (noting the presence of trees within Houghton Grange phase 1, The How and The Spires).

Open space

7.92 The Parameter Plan illustrates a significant amount of open space on the site with residential development located within the northwestern corner. A notable amount of open space is proposed to the east of the site between the residential development and The How drive / The Spires development. The gap varies in width, at the northern end it is approximately 145m wide. Within the centre of the gap where there are a number of pedestrian routes

crossing the site, the width is approximately 115m-130.9m. Towards the south eastern corner between plot 10 of The How the width ranges from approximately 136m to 165m.

7.93 Open space continues around the southern side of the development, incorporating a SUDs pond to the southeast between the existing East - West tree belt and the development. The SUDs pond has been illustrated as the maximum extent of water and is located within this area as the site topography falls towards the south. Details of the form of the SUDs pond and opportunities for its dual use with ecology and soft landscaping will be detailed at future reserved matters applications. The location of the SUDs pond in design terms is supported and provides the opportunity for enhanced landscaping along with ecology as a backdrop to the development and wider area of open space. Further details in relation to the SUDs pond are detailed within paragraph 7.252 of the report.

7.94 The Parameter Plan includes two areas for children's play. An informal play area such as a trim trail (to a standard of a Local Area of Play) is included within the central linear area of public open space (POS), and a Local Equipped Area for Play (LEAP) is located within the open space south of the development and central linear POS area. A LEAP has a minimum area of 400 square metres and comprises of informal recreation and varied, simulating and challenging play experiences. The locations of these spaces are considered acceptable, being close to proposed pedestrian routes through the site and encourage activity within the development and wider area of open space to the south. Details of the equipment as well as hard and soft landscaping for these play spaces will be considered via future reserved matters applications.

7.95 A North-South linear green space is also proposed with a pedestrian route and connections into Houghton Grange (phase 1) along the western edge of the site where an existing tree belt is located, ranging in width of 23m to 35m. A community garden / orchard is proposed as part of this wider area of green space to the north east.

7.96 Whilst the site layout and appearance are to be considered via future reserved matters applications, the submitted Illustrative Masterplan demonstrates development being outward facing and providing opportunities for natural surveillance over all areas of open space adjacent to and within the development area and could be achieved with the quantum of development sought.

Pedestrian and Cycle routes

7.97 The Parameter Plan proposes an East - West shared pedestrian / cycle route across the northern part of the site connecting to The How, which will connect to Knights Way and beyond to the St Ivo

High School and further afield. Another pedestrian connection traverses the site East-West to The How to the east and, Houghton Grange phase 1 to the west. There are pedestrian paths within the strategic green space which are located on key desire line routes allowing for wider connectivity with the adjacent developments to the east, and allowing for connectivity to the south onto The Thicket and Public Right of Way. The Parameter Plan has a 15m tolerance of the location of the pedestrian and cycle access points and exact location of the routes to allow precise details to be agreed at future reserved matters stage. The incorporation of these routes is welcomed and accords with the site allocation SI 1 for a sustainable transport network for pedestrians and cyclists to be integrated with the wider network. Such routes are likely to encourage Active Travel by residents and visitors.

7.98 Whilst the Illustrative Masterplan that accompanies the application is not for formal approval it builds upon the principles established within the Parameter Plan to show the quantum of development proposed. The agent has confirmed that the Illustrative Masterplan contains 99 dwellings and 21 apartments. Whilst the proposed apartments are shown on the Illustrative Masterplan to front onto the central linear open green space, it is considered that there could be opportunities under a future RMA for an alternative layout and apartments could potentially be located along the western side of the site (having a dual aspect onto the western tree belt in a similar configuration to the apartments at Houghton Grange phase 1 on the opposite side of the tree belt), with detached or semi-detached dwellings fronting the linear central area of open space for example.

Other design matters

7.99 Comments regarding concerns that the proposals undermine the quality and value of the current Houghton Grange (phase 1) development are noted. Officers consider however that the principles of development established on the Parameter Plan for the current proposal complements the landscape led character of phase 1 into phase 2. This has been created through the identification of key placemaking principles illustrated on the Parameter Plan including the tree lined approach into the site from the junction of Houghton Road along both sides of Edith Coote Drive close to phase 1, the retention of trees along the western boundary with phase 1, the creation of a central North-South linear green space with street trees, the setback of development from the Houghton Road frontage, and restriction on building ridge heights. Details of the scale and appearance of development will be considered at future reserved matters applications and considered on their own individual merits, noting a range of architectural styles within the vicinity of the site. However there could be opportunities to build upon the character

areas established within Houghton Grange phase 1 with a mix of larger detached dwellings and smaller cottage style dwellings.

7.100 As noted, the HDC Urban Design Officer has raised no objections to the proposals and considers that the key design placemaking principles illustrated on the amended Parameter Plan are acceptable.

7.101 In order to ensure the development retains the principles established within the parameter plan, a condition is necessary to require the reserved matters application to include a statement demonstrating how it has accorded with the parameter plan and to justify any variances from it.

7.102 On the whole, therefore, and subject to conditions, officers consider the proposal would be capable of achieving an acceptable design arrangement, in accordance with adopted policies LP11, LP12 and LP13 of Huntingdonshire's Local Plan to 2036, Policy HWNP17 of Houghton and Wyton's Neighbourhood Plan and the provisions of section 12 of the NPPF.

Health Impact Assessment

7.103 Policy LP29 of Huntingdonshire's Local Plan states that a proposal for large scale development will be supported where it has been informed by the conclusions of a rapid Health Impact Assessment (HIA). The application has been accompanied by a rapid HIA which is considered to demonstrate a satisfactory approach to human health, having regard to the subject matter covered by the rapid HIA.

7.104 The submitted HIA has followed the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment toolkit and has assessed the principle health benefits for future residents and within the local community as follows:

a. Provision of housing, including the availability of affordable housing options, adaptable homes and wheelchair accessible homes. It is noted that some of the housing will meet the needs of lower income members of the community, as well as the needs of the disabled;
b. Connection to the Public Rights of Way network and the creation of accessible open space will encourage social interaction and cohesion as well as promoting physical activity; and
c. The construction phase is likely to provide direct and indirect employment opportunities to local people. This has the potential to induce positive health impacts that are associated with increased income, the establishment of networks, job satisfaction and a sense of self-worth.

7.105 The submitted rapid HIA is considered to be acceptable and accords with the requirements of policy LP29 of the Huntingdonshire Local Plan to 2036.

HOUSING MIX

7.106 Policy LP25 requires that developments provide housing in accordance with the Cambridgeshire and West Suffolk 'Housing Needs of Specific Groups (2021)' that provides guidance on the mix of housing required to meet the needs of Huntingdonshire. This gives broad ranges reflecting the variety of properties within each bedroom category. This indicates a requirement for the following ranges needed; 0-10% 1 bedroom, 20-30% 2 bedroom, 40-50% 3 bedroom, 20-30% 4+ bedroom dwellings.

7.107 Policy HWNP16 of the Neighbourhood Plan relates to 'Windfall residential development' and states that windfall sites in the village that meets local needs will be supported. In particular, the provision of one or two bedroom units and housing that meets the needs of older people is particularly encouraged, and self-build units will be supported on appropriate sites. A number of neighbour comments and objections have also been received in relation to the need for smaller properties and to accommodate the needs of older people. Paragraph 11.8 of the Local Plan also notes that the H&W NP indicates a high level of demand for smaller properties and that development proposals should respond to this preference. Whilst the application proposals are not windfall development when considered against the Local Plan allocation (including supporting text), this policy should still be considered, noting the aspiration for smaller sized units in the parish as stated within the NP and within neighbour comments.

7.108 As the Local Plan is a later adopted document Policy LP25 takes precedence; whilst more weight should be given to Policy LP25 in relation to housing mix, given the wording at paragraph 11.7 of the Local Plan a level of smaller properties (in particular two bedroom units) will be discussed and agreed through reserved matters.

7.109 The submitted Design and Access Statement confirms that a mix of housing is proposed, to provide a variety of typologies. The Illustrative Masterplan shows the potential for three apartment blocks along the linear park, whilst semi-detached and detached houses are illustrated within the remaining part of the proposals. The housing mix includes a variety of unit sizes from two to five-bedroom houses, although the specific breakdown for these has not been provided by the applicant at this stage.

7.110 Detailed housing mix would be determined at reserved matters stage and controlled through condition, but based on the submitted illustrative masterplan on the whole the proposal appears to make a positive contribution in terms of its mix,

enabling a range of occupants and dwelling sizes. As this application is in outline a condition would be necessary to ensure that the submission of a reserved matters application complies with policy LP25 in relation to housing mix.

7.111 The requirements within policy LP25 of Huntingdonshire's Local Plan to 2036 relating to accessible and adaptable homes are applicable to all new dwellings. This states that all dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. These include design features that enable mainstream housing to be flexible enough to meet the current and future needs of most households, including in particular older people, those with some disabilities, and also families with young children. Homes meeting M4(3)(a) 'wheelchair user adaptable dwellings' include further design features so that homes are capable of simple adaptation to meet the needs of wheelchairs users, or M4(3)(b) which are built to fully 'wheelchair accessible' standards where affordable housing for a known user is to be constructed. Policy LP 25 seeks a further uplift above the M4(2) 'accessible and adaptable' standard for a proportion of new dwellings unless site specific factors demonstrate achieving this is impractical or unviable. The starting point for negotiations for provision of M4(3)(a) 'wheelchair adaptable dwellings' is set at 9% for market dwellings and 30% for affordable dwellings. As this application is in outline, with only access details submitted for approval, a condition would be necessary to ensure that the submission of reserved matters applications comply with this policy.

7.112 Subject to the conditions set out above, officers consider the proposed development would accord with Policy LP25 of Huntingdonshire's Local Plan to 2036.

IMPACTS ON TREES

7.113 As noted, the site contains significant trees of different species covered by Tree Preservation Order 015/91. An Arboricultural Implications Assessment (AIA) has been submitted which confirms that thirteen individual trees, eight full groups and part of eight groups are to be removed to facilitate the proposed development; this includes part of four groups classed as high quality (Category A), three individual trees and part of two groups classed as moderate quality (Category B) and the remaining ten individual trees, eight full groups and part of two groups classified as low quality (Category C). In addition, nine individual trees, three full groups and part of one group which are identified as unsuitable for retention (Category U) are also required for removal to facilitate the proposals. The AIA confirms that the loss of these trees is necessary to achieve the construction and landscaping proposals for the site, and to avoid inappropriate tree retention in proximity to new structures and surfacing, where future growth is highly likely to cause conflicts. Some pruning of trees may also be

necessary to facilitate pedestrian access, but it is noted that where this is the case, pruning will be kept to a minimum.

7.114 The exact details of the tree loss and pruning to trees would be confirmed at the reserved matters stage once the detailed design of the development has been progressed. It is proposed that tree loss will be mitigated with a robust and high-quality scheme of new tree planting, which represents an opportunity to increase the quality, impact, diversity and resilience of the local tree stock.

7.115 The HDC Tree officer has fully considered the submitted details and confirmed that the precise location of buildings and infrastructure should be considered in the context of the tree constraints. He has noted that the footprint of any new dwelling, hard surfaces, street furniture or over ground / underground services should avoid the Root Protection Area (RPA) of the retained trees, as well as being mindful of shading and future branch growth, not just of the buildings but of garden spaces too. This is particularly important along the western boundary of site, with the master plan showing a close relationship between retained trees and development. The Tree officer has noted that any REM application should be supported with a Tree Survey (TS) (to include any access facilitation works necessary for construction), a Tree Protection Plan (TPP) and an Arboricultural Method Statement (AMS).

7.116 The recent felling of trees and a hedge along the road frontage to facilitate the installation of underground services has also been raised by the officer, who wishes to see significant planting along the road frontage to provide screening and re-instate important habitat links with tree belts on either side of this development. The latest Parameter Plan for the application illustrates a foul water rising main and 3 m easement, but with frontage tree planting to the north of this along Houghton Road; further details of this planting will be secured at reserved matters stage.

7.117 It is therefore concluded with regards to the impacts upon protected trees that subject to conditions the scheme responds to the context within which it is to sit. As such the proposals are considered to be in accordance with Policy LP31 of Huntingdonshire's Local Plan to 2036 and policy HWNP17 of the Houghton and Wyton Neighbourhood Plan.

HERITAGE IMPACTS

7.118 The decision on this application has to be made in accordance with section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (General duties as respects listed buildings and Conservation Areas in exercise of

planning functions). Section 66(1) states, "*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority … shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". Section 72(1) imposes a duty on local planning authorities "*with respect to any buildings or other land in a conservation area… special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*."

7.119 The NPPF 2024 recognises the importance of preserving heritage assets and supports sustainable development. Paragraph 8 of the NPPF 2024 details the three objectives of sustainability. In relation to environmental matters, this confirms that this includes protecting our natural, built and historic environment.

7.120 Section 16 of the NPPF 2024 (paragraphs 202 to 221) sets out principles and policies for conserving and enhancing the historic environment. Paragraph 207 states that Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'. Paragraph 208 says '*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)'*. This paragraph also says that the significance of the heritage assets 'should be taken into account' when 'considering the impact of a proposal on a heritage asset'.

7.121 Paragraph 212 of the NPPF 2024 advises that 'great weight' should be given to the conservation of designated heritage assets; and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm to, or loss of significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification (paragraph 213).

7.122 Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

7.123 Paragraph 216 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having

regard to the scale of any harm or loss and the significance of the heritage asset.

7.124 Policy LP34 of Huntingdonshire's Local Plan to 2036 states that great weight and importance is given to the conservation of heritage assets and their settings.

7.125 The Heritage Assets in the immediate location are:

1. The St Ives Conservation Area
2. The Hemingfords Conservation Area
3. The Houghton and Wyton Conservation Area
4. Seven Grade II listed buildings (and curtilage listed Gate Lodge)

7.126 There are no World Heritage Sites, registered parks and gardens, registered battlefields or scheduled monuments within the application site or within 1km of the site.

7.127 The application site is partially located within the Houghton and Wyton Conservation Area. The St Ives and Hemingfords Conservation Areas are located adjacent to the boundary of the application site to the south and approximately 200m south-east respectively.

7.128 A total of seven listed buildings (Houghton Poultry Research Station, East Lodge to Houghton Poultry Research Station and West Lodge to Houghton Poultry Research Station, Houghton Bury, Houghton Hill House, The How and curtilage listed The How Gate Lodge) are recorded within 500m of the application site, all listed at Grade II.

7.129 Two non-designated parks and gardens are located within 500m of the application site. A further 52 non-designated assets dating from the Palaeolithic period to the modern period are recorded by the Cambridgeshire HER within 1km of the site and a total of 12 previous archaeological investigations (events) have also been recorded.

7.130 The application is supported by a detailed cultural heritage desk-based assessment which includes full details of identified heritage assets and an assessment of the impact of the application proposals upon the significance of the identified heritage assets and the archaeological potential of the application site.

Impacts on Designated Assets:

Houghton And Wyton Conservation Area

7.131 As detailed within the submitted cultural heritage assessment, the application proposals have the potential to impact on two character areas of the Houghton and Wyton Conservation Area:

Houghton Hill, and Thicket Road East and The Meadows. The Houghton Hill character area is centred on Houghton Hill House and takes in the former grounds of Houghton Grange including land to the north, which comprises Phase 1 of the Houghton Grange development and is located immediately west of the application site, and land to the south of the house which is part of the application site. The south-western part of the application site south of Houghton Grange faces the Thicket Road East and The Meadows character area across Thicket Road and the south-eastern part is separated from the character area by St Ives Thicket, a belt of woodland approximately 60m wide and located to the north of Thicket Road.

7.132 No proposed development is shown for the part of the application site within the Houghton Hill character area. Where the application site shares a boundary with the Houghton Hill character area development on it will introduce built development to part of the setting that was formerly agricultural. The area of the application site to be developed to the north of the Thicket Road East and The Meadows character area will be over 300m north of the boundary of the conservation area and will be screened from it by St Ives Thicket. The developable area of the application site does not form part of the setting of this part of the character area which at its eastern end is defined by woodland to the north and the River Great Ouse and its floodplain to the south. Impact on the conservation area as a result of the application proposals will therefore be confined to the boundary with Phase 1 of the Houghton Grange development. This development is currently underway and the change to setting will result in less than substantial harm, at the lower end of that scale.

St Ives Conservation Area

7.133 The St Ives Conservation Area takes in the historic core of the town but also extends to the west in two strands separated by the eastern extent of the Thicket Road East and The Meadows character area of the Houghton and Wyton Conservation Area. The northernmost of these two strands incorporates St Ives Thicket, a belt of woodland to the north of Thicket Road which forms the southern boundary of the application site. The area of the application site to be developed as detailed on the Parameter Plan will be approximately 260m north of this point.

7.134 The land slopes gently up from the southern boundary of the application site with the conservation area (20m AOD) to the upper part of the application site (33m AOD). The majority of the application site will be screened from the conservation area by the natural landform but it is possible that buildings on the southern edge of the developed area will be visible from the boundary of the conservation area on the north edge of St Ives Thicket (see photomontages in LVA from viewpoint 5).

7.135 The other western strand of the conservation area is mainly located between the River Great Ouse and the disused railway line and the application site will be screened from it by St Ives Thicket and the woodland between Thicket Road and the river which is part of the Houghton and Wyton Conservation Area. The south-western extent of the application site is passed immediately to the south by Thicket Road which then continues along the southern boundary of the conservation area. However, this part of the application site will not be developed and those parts of the site that are to be developed are not passed by any other routes leading into the conservation area; the impression of the visitor of the setting of the conservation area on approaching it will not be altered as a result.

7.136 The setting of the conservation area to the north of St Ives Thicket will be changed by the application proposals which will introduce built development to part of the setting that was formerly agricultural. However, the distance of the proposals from the conservation area (adjacent to the southern boundary of the site), the fact that only part of the proposals will be visible and that it will take the place of the previous research buildings will mean that any harm caused to the conservation area will be less than substantial, at the lower end of that scale.

The Hemingfords Conservation Area

7.137 The Hemingfords Conservation Area is a large area located mainly to the south of the River Great Ouse. The southern boundary of the application site is approximately 200m north-west of the conservation area boundary. The area of the application site to be developed is approximately 400m north of the conservation area which is screened from the site in this location by a belt of woodland either side of Thicket Lane approximately 200m deep.

7.138 The setting of the conservation area is the valley of the River Great Ouse including its floodplain and the wooded valley side to the south of the application site. The application site does not form part of this setting. The application proposals are not passed by any routes leading into the conservation area and the impression of the visitor of the setting approaching the conservation area will not be altered as a result. Within the south-west field of the application site, the spire of St Margaret's Church in Hemingford Abbots is visible. While there is intervisibility between the Spire and the south-west section of the site, the proposals are not considered to alter the rural character of the conservation area. As there are no buildings proposed for the south-west field of the site, this would also not affect the views to the church. The application proposals would not alter the special character of the conservation area. Thus there will be no changes to the setting of the conservation area as a result of the proposals and therefore no resulting impact or harm.

Impacts on nearby Listed Buildings and their Settings

Houghton Poultry Research Station (Houghton Grange):

7.139 Houghton Grange is located approximately 80m from the boundary of the application site but approximately 170m west of the area designated for development. The setting of Houghton Grange is its former park and gardens which includes the southwestern part of the application site that occupies the meadow that formed the southern part of the parkland. However, the area of the application site designated for development is confined to the north and northwest parts of the application site which was in agricultural use up to and after its partial development with buildings belonging to the former research station.

7.140 This listed building is well screened from the application site by the curving belt of trees to the east of the house that was part of the original planting scheme, by existing trees on the western boundary of the house's park, and by existing trees bordering the area to the east of that boundary formerly containing research buildings (now demolished) and now used for attenuation in Phase 1 of the Houghton Grange development.

7.141 The setting of Houghton Grange has changed as a result of the Houghton Grange Phase 1 development which has removed the modern wings to either side of the house, converted the house into five residential units and developed the area either side of the lime tree avenue that approaches the house. However, development on the application site will not result in further changes to Houghton Grange's setting. The house's relationship with the remaining elements of its park will be unchanged as a result. The remaining elements of the house's formal gardens to the south will be unchanged by the application proposals and the house's relationship with them will be preserved. Similarly, the important view over the valley of the River Great Ouse for which the house's location will have been chosen will be uninterrupted. There will therefore be no impact on the asset as a result of the application proposals and no resulting harm.

East Lodge and West Lodge to Houghton Poultry Research Station:

7.142 The two lodges are located approximately 215m west of the application site. The setting of the lodges is Houghton Grange and its drive, bordered by an avenue of lime trees that links them to it. While the Houghton Grange Phase 1 development will change this setting by introducing development either side of the avenue, development on the application site will not further detract from this relationship, with no resulting loss of significance. The assets are screened from the application site by existing planting along the western boundary of the site and by existing planting and

buildings within the Houghton Grange Phase 1 site. Development on the application site will be apparent to those travelling west along the A1123 Houghton Road towards the lodges, however, the north-west corner of the site is approximately 240m east of the lodges and the ability of the viewer to appreciate the significance of the assets as gate lodges to a large country house will not be affected at this distance. It is considered therefore that there will be no impact on the assets as a result of the proposals and no resulting harm.

Houghton Bury:

7.143 Houghton Bury is located approximately 80m west of the application site and approximately 330m south-west of the area proposed for development. The majority of the intervening distance is covered with existing tree planting which is dense in places. Development of the application site will not therefore change the asset's isolated setting on the north side of the valley of the River Great Ouse. A proposed footpath from the application site to St Ives Thicket will link with an existing PRoW to the east of the asset and south of Houghton Grange. However, the asset is not visible or appreciable from this location, being screened by dense tree planting. There will therefore be no impact on the asset as a result of the proposals and no resulting harm.

Houghton Hill House:

7.144 Houghton Hill House is located approximately 550m west of the application site. This asset will be screened from development on the site by buildings and existing tree planting in the grounds of Houghton Hill House, existing tree planting either side of and within the grounds of Houghton Grange and buildings within the grounds of Houghton Grange. While development on the site will be apparent to those travelling west along the A1123 Houghton Road the asset is not visible or appreciable from the road and a distance of almost 500m is covered between the north-west corner of the site and the entrance to the asset's grounds. It is considered therefore that there will be no change in the setting of Houghton Hill House with no resulting impact on or harm to the assets as a result of the proposals.

The How:

7.145 The How is located approximately 70m east of the application site boundary and approximately 200m south-east of the area proposed for development. The asset's setting has changed considerably since it was built, from complete isolation on the north side of the valley of the River Great Ouse to the western edge of the suburban fringe of St Ives. The residential development to the north and north-east of the asset (on land previously occupied by a golf course and before that used as agricultural land) has increased this effect. In addition planning permission has been

granted for the development of 18 homes to the north of The How (application reference 19/02280/FUL), which are currently being constructed.

7.146 The asset is reasonably well screened from the proposals by planting within its grounds; however the proposals will be apparent from the How access road, which runs through the belt of trees immediately to the east of the application site.

7.147 The presence of the proposals in the landscape will increase the area of built development to the west of St Ives, further changing the How's setting. However, the broad expanse of agricultural land to the west of this asset, which runs across the southern extent of the application site and on to the boundary of Houghton Bury approximately 700m away will remain unchanged. The asset's important views to the south across the valley of the River Great Ouse, which will have been the reason the house's location was chosen, will also be uninterrupted.

7.148 The application proposals will therefore change The How's setting by introducing further built development to the area to the north of the asset leading to some impact on the asset, but the asset's setting to the south and west and its important views to the south will be unaffected and this, along with the large area of the asset's grounds remaining, mean that the asset will continue to be appreciated as an early 20th century country house. The resulting harm will therefore be less than substantial, at the lower end of that scale.

Gate Lodge to The How:

7.149 The curtilage listed Gate Lodge to The How is located directly to the north-east of the application site. Modern houses have been built to the south-west of the Lodge, situated between the Lodge and the application site. There would likely still be some intervisibility with the site from the first floor of the Lodge.

7.150 The proposals will change the Gate Lodge's setting by introducing further built development to the area to the south-west of the asset, leading to some impact on the asset. The pedestrian cycle access connection to the south of the Gate Lodge may also result in increased movements along the approach road to The How, which would alter the building's setting. However, the addition of modern buildings to the south-west of the Lodge and the increased movements would not alter the Lodge's relationship with The How, or the existing avenue to the house. Thus, the harm caused would be less than substantial as neither the building, nor its relationship to the How, would be changed.

7.151 The submitted Heritage assessment does not specifically confirm at what end of the scale the less than substantial harm will be in respect of the Gate Lodge to the How, unlike the assessment does

for other heritage assets. However, the HDC Conservation officer considers that the resulting harm will be less than substantial, at the lower end of that scale.

Non-Designated Heritage Assets:

7.152 A number of non-designated heritage assets have been identified within the submitted cultural heritage assessment, which include Houghton Grange Park and Garden and Houghton Hill House and Garden. The submitted assessment concludes that there will be no resulting impact on or harm to these identified assets as a result of the application proposals.

7.153 In respect of ridge furrow, based upon previous archaeological evaluation, magnetometer survey and aerial photography it is highly likely that medieval ridge and furrow will be impacted by works associated with the proposals. This is considered to hold local significance based on its archaeological and historical interest; however, it is very degraded, with much of it already ploughed flat and only discernible via geophysical surveys. It is therefore of limited heritage value and it is noted that there are much better examples surviving as earthworks to the west and southwest, outside the application site.

7.154 In relation to previously unrecorded archaeological remains, the submitted statement notes that due to the low significance of the identified medieval ridge and furrow, and the high likelihood for any previously unidentified archaeological remains to have been heavily truncated by ridge and furrow, the County Archaeologist has determined any impacts from intrusive works associated with the construction of the application proposals to be negligible.

Conclusion:

7.155 The submitted assessment concludes that the application proposals will cause no harm to the Hemingfords Conservation Area and will cause less than substantial harm to the Houghton and Wyton Conservation Area through physical changes to the south-west field of the application site and to the St Ives Conservation Area through a change to its setting. However, it is concluded that the harm would be at the lower end of less than substantial.

7.156 Of the listed buildings within the 500m study area it is concluded that the proposals will have an impact on the Grade II listed The How and its curtilage listed Gate Lodge as a result of change to their settings, but that the resulting harm will be less than substantial at the lower end of that scale. The assessment concludes that the proposals will result in no impact on the two non-designated built heritage assets within the 500m study area; Houghton Grange Park and Garden and Houghton Hill House Park and Garden.

7.157 The proposals will result in physical impacts on the site and it will impact upon non-designated assets of local significance (very degraded medieval ridge and furrow). Whilst there would be substantial harm where it results in the truncation of these, it is noted that these assets are of local importance only and are only of low significance as they are very degraded and there are much better examples surviving as earthworks to the west (A34) and south-west (A35), outside the application site.

7.158 Historic England have not offered any comments; instead they have advised seeking the views of specialist conservation and archaeological advisers.

7.159 Cambridgeshire County Council Archaeology have confirmed that due to the limited results of archaeological works in the immediate vicinity, they have no objections or requirements for further archaeological investigations at the site.

7.160 The HDC Conservation officer has fully reviewed the proposals and considers that the submitted report makes a reasonable assessment of the impact of the development on the significance of the identified heritage assets, as set out above (noting that it is considered that the resulting harm will be less than substantial at the lower end of that scale in respect of the impact of the proposals on The How Gate Lodge, as set out in paragraph 7.151 above). The Conservation officer confirms that that a proportionate approach has been taken (the report focuses on the assessment of harm) that accords with the NPPF and is therefore acceptable.

7.161 The Conservation officer has noted that the application is for outline planning permission with all matters reserved and therefore consideration of the proposals are limited to the acceptability of the principle of development. Details such as roads, lighting, noise etc will be fully considered within any future reserved matters application. Therefore at such time as a reserved matters application is submitted, impacts on heritage assets from other aspects of the development, such as roads, lighting and noise can be fully considered and opportunities for mitigation can be identified, if required.

7.162 To conclude on the issues relating to the impacts of the proposals on three designated heritage assets, the development will constitute ‘less than substantial harm’ to these identified designated heritage assets and ‘substantial harm’ to a non-designated heritage asset (medieval ridge of furrow). In terms of the NPPF 2024, paragraph 212 directs that great weight should be given to the conservation of designated heritage assets “*irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*”. Any harm to the significance of a designated heritage asset (including from development within its setting) should require clear

and convincing justification (paragraph 213). Paragraph 215 states that where harm is identified to be 'less than substantial' this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

7.163 Paragraph 216 of the NPPF directs that "the *effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*."

7.164 Later in this report it is concluded that the less than substantial harm to three identified heritage assets and substantial harm to a non-designated heritage asset from the proposed development is outweighed by the public benefits of this development (housing delivery on an allocated site and the delivery of additional public access to green space). Therefore, the scheme is considered to comply with policy LP34 which recognises "*the statutory presumption that the avoidance of harm can only be outweighed if there are public benefits that are powerful enough to do so*".

7.165 Giving effect to the statutory duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 means that they are accorded considerable importance and weight when weighing up any harm against the benefits. Against that background, and applying the relevant paragraphs of the NPPF and Policy LP34 of Huntingdonshire's Local Plan to 2036, the heritage harm identified above must be weighed against the benefits of the proposal.

HIGHWAY SAFETY AND TRANSPORT IMPACTS

7.166 This section is concerned with the impacts of the proposal itself, in terms of the level of vehicle movement associated with its development, appropriate mitigation and related aspects.

7.167 Paragraph 115 of the NPPF (2024) advises that in assessing applications for development, it should be ensured that '*sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location*' and that '*safe and suitable access to the site can be achieved for all users*', and that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 116 goes on to state that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual

cumulative impacts on the road network would be severe, taking into account all reasonable future scenarios.

7.168 Policy LP16 of Huntingdonshire's Local Plan to 2036 encourages sustainable transport modes and LP17 supports proposals which incorporate appropriate space for vehicle movements, facilitates accessibility for service and emergency vehicles and incorporates adequate parking for vehicles and cycles.

7.169 The application is supported by a Transport Assessment (TA) and Framework Residential Travel Plan (FTP). The submitted TA states that access to the site will be via an existing signal-controlled junction on Houghton Road at its junction with Garner Drive. There is a staggered toucan crossing with dropped kerbs and tactile paving at the junction on the southern arm that will connect to the application site, providing safe east-west pedestrian and cycle accessibility along the southern side of Houghton Road. There are also staggered puffin crossings with dropped kerbs and tactile paving across Houghton Road, one each side of the junction, providing a safe route to Garner Drive and beyond to Thorndown Primary School.

7.170 To the north of the application site, along the A1123 Houghton Road, there is a shared footway and cycleway on the southern side of the carriageway between St Ivo Academy to the east and Houghton to the west. There is also a footway on the northern side of Houghton Road to provide access to an eastbound bus stop and connecting to crossing points. The A1123 is single carriageway that has a 30mph speed limit and has street lighting.

7.171 PRoW 132/8 is an existing footpath within the southern area of the application site that runs in an east-west direction for 276 metres from PRoW 132/10. PRoW 132/10 is a footpath to the south of the application site that runs in an east-west direction between Church Street and Meadow Lane (along the Thicket).

7.172 A pair of bus stops are located in the immediate vicinity of the application site along the A1123 Houghton Road. These serve eastbound and westbound services and both are within 50m of the junction. Both stops (which are served by Stagecoach bus routes B and C) have shelters with seating, timetable information and real time service information. The bus services link to the Guided Busway, which provides a fast and frequent public transport link connecting Huntingdon, St Ives and Cambridge.

7.173 With regard to road safety, the submitted TA confirms that collision data for the surrounding highway network has been obtained from Cambridgeshire County Council. This data confirms that there have been two collisions in 5 years, however this is not considered to represent a cluster, and this, in conjunction with the low severity of the incidents recorded, suggests there are no existing safety

issues in the vicinity of the application site that would be exacerbated by the application proposals.

7.174 Multi-modal trip generation of the development has been assessed using trip rates obtained from TRICS and the modal split has been identified using 2011 Census journey to work data. The proposed development has been calculated to generate 117 two-way trips during the morning peak hour 8-9am (26 in and 91 out trips) and 101 two-way trips during the evening peak hour 5-6pm (69 in and 32 out trips). The submitted TA states that that more than half of the development trips (54.6%) are predicted to travel east on Houghton Road towards St Ives while just less than a quarter (24.0%) are predicted to travel west on Houghton Road towards Huntingdon. Some trips are assigned to Sawtry Way for accessing the A1 in the North (16.9%) and both Hill Rise and High Leys generate some trips for those accessing employment locations (3.6% and 0.9% respectively).

7.175 Capacity assessments have been undertaken at three junctions on Houghton Road including the site access, the Hill Rise/ High Leys junction and the junction with Sawtry Way. The results of surveys indicate that the Houghton Road/ Garner Drive/Houghton Grange site access junction currently operates within the desirable maximum during both peak hours and that the Houghton Road/Hill Rise/ High Leys junction operates below maximum desirable in both peaks. In respect of the Houghton Road/Sawtry Way junction, the results indicated that the A1123 Houghton Road / Sawtry Way junction currently operates within capacity with minimal queuing.

7.176 The highway modelling results within the submitted TA compares the 2028 and 2033 future operation of key local junctions, allowing for general background growth and committed development, together with full occupation of the proposed development.

7.177 The Houghton Road/Garner Drive/Houghton Grange site access junction is forecast to be operating with a negative practical reserve capacity (PRC) by 2033 without the proposed development. With the addition of the proposals the PRC reduces by 1.0% in the AM peak and 1.6% in the PM peak, with no significant changes in the mean maximum queue. Therefore, the TA concludes that the impact of the proposals on the operation of this junction is not significant. The Houghton Road/Hill Rise/ High Leys junction is forecast to operate marginally above the desirable maximum degree of saturation in the AM peak and below in the PM peak in 2033, without and with the proposals. The TA therefore concludes that the impact on the operation of the junction is considered to be negligible. The TA states that the proposal is forecast not to have a significant impact on the A1123 Houghton Road / Sawtry Way junction in 2033, operating below the desirable maximum ratio flow to capacity without and with the proposals. These results therefore indicate that, in general, the application

proposals would not be expected to have a significant impact on the operation of the local junctions.

7.178 As noted, access will be taken from the southern arm of the existing signal-controlled junction that serves the Slepe Meadow housing development to the north of Houghton Road. As shown on the submitted Parameter Plan, once into the development, a network of connected routes will be provided to ensure that it is permeable to encourage walking and cycling and that for motor vehicles the site is easy to navigate (noting that the layout of any development would be considered at reserved matters stage). The submitted plans illustrate pedestrian routes to the southern boundary of the site adjacent to the HDC owned land along The Thicket. Within The Thicket HDC land are a series of footpaths that connect to The Thicket (PRoW 132/10). There is also a proposed footpath and cycle path to the east towards The How, which will link up to Knights Way.

7.179 The submitted Framework Residential Travel Plan sets out ways to reduce the use of private vehicles by residents, by promoting active travel and public transport facilities. A range of measures have been identified including promotion of the Travel Plan to actively engage residents in the process, measures and events to promote the benefits of active travel, measures to encourage cycling, and measures to encourage the use of local bus services.

7.180 Following receipt of additional information the County Council as Local Highway Authority (LHA) raise no objections, noting that the site is connected to an existing access road to the highway which has been previously approved and that this is an outline application. They have noted that the actual layout in the form of roads and buildings will be the subject of a future reserved matters application which they will be consulted on in due course. A number of conditions have been proposed by the LHA covering: full details of layout and siting, visibility splays, parking provision, turning and loading areas; details of the proposed management and maintenance of the proposed streets; binder course surface level before first occupation, temporary facilities clear of the public highway during construction and construction traffic routes.

7.181 The County Council Transport Assessment Team (TAT) have fully reviewed the submitted details and following receipt of additional information raise no objections to the proposals. Comments received note that updated LinSig models have been provided for the site access junction with the A1123 and the A1123 with Hill Rise; these have been reviewed by the signals team and are deemed sound. The models show that the site access junction is forecast to operate slightly over Practical Reserve Capacity (PRC) in all forecast scenarios during both peak hours, although it is not forecast to reach absolute capacity. The TAT comments conclude that the proposed development traffic makes the junction performance deteriorate slightly as reported in the transport

statement, and therefore the applicant should introduce MOVA control at the junction to reduce overall delays.

7.182 To note, a MOVA (microprocessor optimised vehicle actuation control) is a sophisticated strategy that uses microprocessors to assess the best signal timings given the physical layout of the junction, the signal stages available and the traffic conditions at the time. Once a MOVA site has been set up successfully, the system will generate its own signal timings cycle-by-cycle, varying continuously with traffic conditions, both in the short term (hour to hour, day to day) and in the long term following annual trends and longer term traffic growth. This means that the signal timings can vary widely as the traffic conditions change, which reduces delays.

7.183 The TAT has confirmed that there are no objections to the proposals subject to two conditions; the first relates to the installation of a MOVA at the site access signal controlled junction with the A1123, with full details to be submitted for approval (unless provided by Morris Homes in the meantime under S278 works). The TAT also propose a condition relating to the provision and implementation of a Residential Welcome Pack, that shall include suitable measures and incentives inclusive of bus vouchers and/or active travel vouchers to promote sustainable travel.

7.184 Officers note the recommended conditions by the Local Highway Authority and Transport Assessment Team and consider these are required to ensure the development is safe for its lifetime in highway terms and that the proposals deliver improvements necessary to ensure there is capacity for the development, and that sustainable travel is promoted.

7.185 The County Rights of Way Team have raised no objections to the proposals, noting that Public Footpath Number 8, Houghton and Wyton is located in the south-west section of the site and that the applicant should ensure that there is connectivity between this footpath and the proposed new public highways of the adjacent planning sites. A condition has been proposed to secure a Public Rights of Way scheme, which is considered to be necessary as it will improve connections.

7.186 Concerns have been raised from nearby residents and Parish/ Town Councils in relation to congestion along the A1123 and impacts of the proposals upon the highway network.

7.187 In response to network capacity, as noted above the application has been accompanied by a Transport Assessment (TA) that, following further modelling and information, is supported by the County Council TAT as a technical consultee. It should also be noted that the Local Plan was supported by the Huntingdonshire Strategic Transport Assessment which included the development scenarios of the site allocations, including SI 1.

7.188 This is a sustainable and accessible location with good public transport provision and bus stops along Houghton Road. The development will include pedestrian and cycle links from the site, through the adjacent How development and into the Spires development and the wider link into the town secured as part of the Barratts development. There will also be a more direct link south towards the Thicket Path (although the topography of this section of the site is acknowledged), thus enhancing the options for journeys by foot and bike. The shared foot and cyclepath along Houghton Road is in good condition, connecting towards Huntingdon and Cambridge.

7.189 Having regard to the NPPF it is therefore not considered that the residual cumulative impacts of this development on the road network would be severe. Subject to adherence to the proposed conditions it is considered that adequate access could be provided for this residential development such that the proposed development would not be detrimental to highway safety. The proposal is therefore considered to comply with paragraph 115 of the NPPF 2024 and policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036.

IMPACTS TO RESIDENTIAL AMENITY:

7.190 The NPPF (2024), Policy LP14 of Huntingdonshire's Local Plan to 2036 and the Huntingdonshire Design Guide (2017) seek to protect the amenity of neighbouring occupiers and ensure a high standard of amenity for future occupiers of new developments.

7.191 The application is in outline form, and as such the detailed design will fall to future reserved matters applications. It is therefore not possible to be conclusive in relation to matters of overlooking, overbearing, or overshadowing impacts. The correct test at this stage with an outline planning application is whether it is reasonably likely the development could be accommodated without adverse impacts to neighbouring residential amenity.

7.192 Officers consider that, given the scale of the development and the separation from neighbouring property there is no reasonable basis to conclude an acceptable relationship cannot be accommodated with neighbouring off-site property in terms of overlooking, overshadowing or overbearing impacts. The development proposes uses that are largely reflective of typical residential locations, and as such there is not considered to be any basis to expect the development would give rise to noise or emissions that would otherwise impact surrounding amenity.

7.193 Whilst development of the application site would change the nature of outlook of some properties constructed on adjacent

development schemes, it is however noted from Case Law that a private view is not something which can be protected within the planning system.

7.194 With regards to construction impacts on surrounding amenity, there will be an effect during the short to medium term without mitigation. The most impactful element of the construction phase will be at the outset during the foundation phase, where there is the heaviest machinery on site. That said, this is likely to be spread across the course of the development as the buildout works through phases. A condition to secure details within a Construction Environmental Management Plan (CEMP) is therefore proposed to include potential mitigation measures (noise limits, compliance with industry standards and inclusion of appropriate review mechanisms). Any CEMP will also include an appropriate point of contact for local residents who may experience issues, together with proposals to ensure resolution. It is considered that this is a reasonable approach to mitigate the construction impacts of the development on surrounding amenity.

7.195 Subject to the conditions set out above, it is considered the proposal is therefore considered to accord with the NPPF and policy LP14 of the Huntingdonshire Local Plan to 2036 in respect to off-site neighbour amenity.

Amenity And Health Of Future Occupants

7.196 The application is in outline form, and as such any matters of detailed design cannot be determined at this stage. Consideration should therefore fall to whether it is likely, having regard to the details available, that satisfactory arrangements can be made for future occupants with regards to amenity and health.

7.197 In respect to amenity, given the scale of the application site, officers consider that there is a reasonable likelihood that residential units can be accommodated that provide sufficient amenity space and are not adversely impacted through overlooking or loss of light. It is noted that, in any event, occupants would be aware of the layout and relationship of the site and would be able to make an informed decision on how that relationship would relate to their personal needs.

7.198 The application proposals are supported by a noise survey which confirms that long term noise surveys have been undertaken at two locations (location 1: to the north of the site at the boundary with Houghton Road and location 2: to the east of the site at the boundary with The Spires) to define ambient noise levels at the site and at nearby noise sensitive receptors.

7.199 At location 1, the dominant noise sources observed on site during the day was traffic noise from Houghton Road, with other noise sources including crickets from the field and very low noise levels from HGV and plant activity from a nearby development site. At

location 2 the dominant noise source was similar to that at location 1, however traffic and site noise were quieter than at location 1 due to the monitor being at a further proximity from these noise sources.

7.200 In relation to internal noise conditions the submitted noise report confirms that the external façades of the proposed development will be designed to ensure provision of suitable internal noise conditions in accordance with BS 8233:2014. The report sets out glazing recommendations, which includes a high performance acoustic glazing for facades directly fronting onto Houghton Road, with standard thermal double glazing elsewhere on the site, to ensure that suitable internal noise conditions are achieved.

7.201 The submitted report explains that it is generally accepted that the sound reduction through a partially open window is 10-15 dB(A). Based on the noise levels measured, ventilation using partially open windows would be acceptable throughout the development site except for the proposed properties directly fronting onto Houghton Road, where ventilation will need to be provided by acoustically attenuated trickle vents.

7.202 To comply with Building Regulations (Part F) (Ref 16)14, it will be necessary to provide ventilation so occupants can ventilate their property without breaking the acoustic seal of the building envelope. Based on the predicted worst-case façade noise levels, acoustically attenuated trickle vents in the window frames are considered to be acceptable. It is noted that glazing and ventilation performance requirements will be refined and determined for all facades of the development buildings, which would be considered at reserved matters stage.

7.203 In relation to outdoor amenity areas (i.e. gardens) the report states that these should aim to achieve noise levels that do not exceed the 55dB LAeq,T threshold stated in BS 8233.

7.204 The report confirms that due to the proposed site layout, distance attenuation and acoustic screening provided by existing and future residences and the topography of the site, all outdoor private amenity areas (e.g. gardens) are expected to achieve noise criteria for external amenity spaces.

7.205 It is noted that operational noise limits for any fixed plant and building services plant have been recommended as to not adversely affect existing noise sensitive receptors. Consideration will therefore need to be given to the noise emitted by fixed plant and building services during detailed design stages (at reserved matters stage) so as to not adversely affect new residential properties in the development itself.

7.206 The HDC Environmental Health officer has fully reviewed the submitted details and confirmed that with appropriate mitigation, the required noise levels can be achieved.

7.207 The officer has however noted that with regard to BS8233, HDC require all properties to be designed to meet the standard within BS8233:2014, defined as an internal noise level of 30dBL_{AeqT} within bedrooms, 35dBL_{AeqT} in living rooms; and 45dBL_{AFmax} for individual noise events in bedrooms at night, as per the World Health Organisation (WHO). These should be achieved with windows partially open in order to ensure that residents do not have to keep their windows closed. Where this is not possible and developers rely on closed windows to achieve suitable internal noise levels, alternative ventilation may be considered by the LPA as a last resort. Full justification demonstrating consideration of alternative mitigation measures such as the design, distance, acoustic screening, orientation of buildings, locating additional windows on quieter facades and screening of sensitive rooms/areas by non-sensitive ones etc, is required to confirm the need for alternative ventilation has been minimised as far as practicable. Good acoustic design measures within ProPG Planning & Noise should be followed. Where alternative ventilation is required full details of the system will need to be supplied, demonstrating that it can achieve air changes comparable to an open window, therefore occupants of all habitable rooms will require a suitable ventilation system which achieves 2 - 4 air changes per hour. Trickle vents are considered to only provide background ventilation and would not be deemed sufficient to provide adequate ventilation for summer cooling. Other mitigation measures to enable internal guidelines to be met with windows open include acoustic plenum windows which may provide sufficient attenuation whilst allowing windows to be open, which could negate the need for alternative/mechanical ventilation in habitable rooms.

7.208 In respect of external noise levels, the Environmental Health officer has noted that as a mainly rural district HDC requires developers to aim for noise levels to not exceed 50dBL_{AeqT} in external amenity areas during the day. It is noted that guidance does provide an upper guideline value of 55dB L_{Aeq}, which it states would be acceptable in noisier environments, therefore HDC may accept this in more urban areas, as the maximum upper limit for sensitive external areas to be within. In this case, with the site being located in close proximity to a main A road and the town of St Ives, 55dB is likely to be considered acceptable externally during the day.

7.209 A noise related condition has therefore been requested by the officer, which is considered to be acceptable and necessary. Conditions have also been requested in respect of construction hours; to cover these matters, a CEMP condition is therefore proposed.

7.210 Noting the comments of the Environmental Health Officer, who has raised no objections subject to conditions, officers therefore consider the proposal would create a satisfactory noise environment for future occupants.

7.211 On the whole, and subject to conditions, officers consider the proposal has made adequate demonstration that a suitable amenity environment can be achieved for future occupants, and therefore accords with the NPPF and policy LP14 of the Huntingdonshire Local Plan to 2036.

BIODIVERSITY AND GEODIVERSITY:

7.212 Section 15 of the NPPF (2024) provides national planning policy on Conserving and enhancing the natural environment. Paragraph 187 of the NPPF (2024) states that '*the planning system should contribute to and enhance the natural and local environment*' including by 'protecting and enhancing sites of biodiversity value (in a manner commensurate with their statutory status or identified quality in the development plan); and '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'*.

7.213 Paragraph 193 of the NPPF (2024) sets out principles to apply when determining planning applications, including:

"(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then planning permission should be refused;

(b) development of land within or outside of a Site of Special Scientific Interest, and which is likely to have an effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest."

7.214 LP30 of Huntingdonshire's Local Plan to 2036 covers Biodiversity and Geodiversity. Its requirements include that proposals demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated; that a proposal likely to have an impact, either direct or indirect, on biodiversity or geodiversity will need to be accompanied by an appropriate appraisal; that adverse impacts are avoided, adequately mitigated, or as a last

resort to compensated against a hierarchy of sites, habitats, and protected species. It also requires a proposal to ensure no net loss in biodiversity and to provide no net gain where possible, with large scale developments required to provide an audit of biodiversity losses and gains.

7.215 Policy HWNP2 'Protection of sites' of the Houghton and Wyton Neighbourhood Plan states that "*all new development should protect and, wherever possible, enhance biodiversity and establish, enhance or extend ecological corridors and the connectivity between them*."

D*esignated And Undesignated Sites:*

7.216 The submitted Ecological Impact Assessment (EcIA) confirms that due to the distance (greater than 5 km) separating the application site from the identified designated sites of international importance, there will be no direct impact (through habitat loss) on habitat and no fragmentation of habitats, or of populations of species using habitats within designated sites of international importance.

7.217 The application site is in close proximity to the Houghton Meadows Site of Special Scientific Interest (SSSI), which lies to the south west of the site. Natural England have raised the issue of residential development resulting in increased visitor / recreational pressure to the SSSI which has the potential to harm the important features that have led to its designation.

7.218 Whilst this concern is acknowledged, the Local Plan allocation for St Ives West seeks to provide approximately 23ha of 'Strategic Green Space' with the first phase (associated with the Barratt Homes / The Spires development) that has already been provided to the Council through the delivery of Berman Park. Additional land has also been secured through 'The How Strategic Green Space' as part of The How development. The current application proposals will result in the delivery of further strategic green space (which contributes to the overall 23ha green space requirement as set out within the Local Plan allocation). Therefore collectively this land will provide a large alternative area of green space which will aid in reducing and limiting potential visitor recreational pressures on the SSSI. Officers therefore consider the proposal is not likely to cause material harm to the SSSI.

7.219 There will be no direct impact (such as through habitat loss) on the Houghton Meadows SSSI as a result of construction of the proposals. There will be no fragmentation of habitats, or of populations of species using the SSSI, during construction. Boundary vegetation, such as hedgerows connecting the site to the SSSI will be retained, which will allow for connectivity for species using such features. There will be no disturbance to the SSSI or habitat degradation through construction of the proposals,

although there will be some dust generation, along with noise, visual disturbance and any lighting. It is noted that providing embedded mitigation measures are adopted, indirect effects to Houghton Meadows SSSI during construction as a result of noise, visual disturbance and lighting will not impact on the integrity or the functioning of this SSSI. There will be no mortality of any species associated with the SSSI during construction of the proposals.

7.220 Part of the application site (to the south of Houghton Grange) comprises a County Wildlife Site (CWS). This has been designated as such as it supports at least 0.05ha of NVC community MG5 Crested Dog's-tail - Black Knapweed grassland.

7.221 All semi-improved neutral grassland present within the CWS will be retained. Security fencing will be erected to protect retained habitats from incursion during construction and there will be no direct loss of semi-improved neutral grassland. During construction, there is the potential that preparation of the site and construction of the proposals will result in dust and other pollutants (such as emissions from construction vehicles and oil-spills) which may impact grassland habitats within the CWS. However, the footprint of the proposals is around 150m from the CWS and the implementation of standard environmental protection measures will ensure that pollution during construction will not affect the integrity of retained grassland habitats.

7.222 Semi-improved neutral grassland across the site will be retained and there will be no species mortality of any species using this habitat during construction of the proposals. Following occupation of the dwellings, increased recreational pressure has the potential to cause habitat degradation through increased recreational use. However, the creation of significant green open space and footpaths within the site and other existing public open space within the vicinity will reduce any potential pressure (through increased recreational use) on the CWS and ensure that there is no damage or destruction on the interest features of the CWS.

7.223 The Wildlife Trust (as the LPA's Ecological consultant) has reviewed the submitted details and confirmed that the Ecological Impact Assessment (EcIA) has been prepared in accordance with CIEEM guidelines and prepared to a high standard.

7.224 In respect of designated sites, the Wildlife Trust considers that the EcIA has properly assessed impacts on internationally and nationally designated nature conservation sites, noting that the assessment correctly identifies that the only site likely to be adversely impacted by the development is Houghton Meadows SSSI. The impacts arise from an increased population and likely increase in numbers of visitors, particularly those walking dogs. However and as noted above, the application includes a significant area of new natural greenspaces which should be capable to

providing suitable alternative natural greenspace to avoid impacts on the SSSI.

7.225 The Wildlife Trust suggests on-site signage to show circular walking routes, other destinations of interest, and to explain the sensitivities of nearby nature sites including Houghton Meadows SSSI and Houghton Grange Grassland CWS, which should be reinforced by the inclusion of information within all new residents' packs. This can therefore be addressed and secured at reserved matters stage.

7.226 In respect of un-designated sites and habitats, the Wildlife Trust notes that the application proposals avoid most impacts on habitats, although there will be removal of species-poor grassland, small areas of scrub, a few trees and a section of low value hedgerow. These are replaceable and the Biodiversity Net Gain Assessment report demonstrates how this will be achieved.

7.227 It is noted that the biggest impacts from the development will be on Houghton Grange Grassland County Wildlife Site, which is within the site boundary and identified as part of the new natural greenspaces to mitigate potential impacts on Houghton Meadows SSSI. While there are no significant direct impacts from the construction phase, there will be adverse impacts from the use of the site as natural greenspace by new residents. The Wildlife Trust suggest that a detailed grassland restoration plan should be included within a Landscape and Ecology Management Plan (LEMP), which should include a reduction in the area of scrub and restoration of areas of species-poor grassland to increase the native wildflower component. A LEMP will therefore be secured by condition.

7.228 With the imposition of conditions, it is therefore considered that impacts on designated and undesignated sites have been suitably addressed in accordance with Policy LP30 and paragraphs 187 and 193 of NPPF (2024).

Protected Species:

7.229 The Ecological Impact Assessment (EcIA) submitted alongside the application confirms the proposals could affect a number of species which include Great Crested Newts, reptiles, breeding birds, bats and badgers.

7.230 In respect of Great Crested Newts (GCN), there are known populations to the west of the application site and to the east; the potential impacts to GCN as a result of the proposals are direct mortality and loss of terrestrial habitat. It is noted that the site is dominated by improved grassland which offers low value habitat for GCN, but the linear habitats (such as tree-lines and boundary

features) do offer more suitable habitat and it is assumed that transient GCN are likely to be present throughout the site, albeit in small numbers. Vegetation clearance is to be undertaken in a sensitive manner and at an appropriate time of year to avoid potential impacts to GCN, which is supported. The submitted EcIA confirms that a Natural England EPS licence will be sought to allow for the clearance of GCN terrestrial habitat that is necessary to undertake construction of the application proposals and that following the implementation of best working practices to reduce the risk of mortality (alongside the licence), there are unlikely to be adverse impacts upon GCN's during the construction period and no significant effects.

7.231 In relation to reptiles, the submitted EcIA confirms that the application proposals will lead to a small loss of habitat that is potentially suitable for transient reptile species, although the majority of habitat that offers suitable reptile habitat (such as the grassland, ditches) is retained within boundary features and is outside the footprint of the development proposals. It is noted that best practice construction methods will ensure vegetation clearance on site will be undertaken in a sensitive manner and at an appropriate time of year to ensure there is no species mortality to transient reptiles during construction. Therefore, through the retention of the majority of habitats on the site that could support reptiles and the mitigation measures outlined in the submitted EcIA, any transient reptiles on the site will be unaffected and there will be no adverse impacts on reptiles and no significant effects.

7.232 In respect of breeding birds the submitted EcIA notes that the construction of the proposals will lead to a small loss of habitat used by breeding bird species, although the majority of habitat supporting breeding birds is retained within boundary features and within scrub and trees outside of the footprint of the proposed built development. It is noted that best practice construction methods will include implementation of measures to minimise noise, lighting and vibration disturbance to breeding birds to ensure that, where construction of the proposals is undertaken within the bird breeding season (typically March to August inclusive), then disturbance to breeding birds in adjacent and retained habitats will be minimised.

7.233 The construction of the proposals, if undertaken within the bird breeding season (typically March to August inclusive), has the potential to cause mortality to breeding birds in habitats that are to be removed. Nesting bird checks will therefore need to be undertaken by an ornithologist prior to construction (where this occurs within the breeding season) to ensure there is no species mortality. Therefore, with mitigation in place, there will be no species mortality of any breeding bird species during construction of the proposals. Therefore, through the retention of the majority of habitats on site that support breeding birds and the mitigation

measures, there will be no adverse impacts on breeding birds and no significant effects.

7.234 In relation to bats, the proposals will not impact upon any identified bat roosts; the buildings that were found to contain bat roosts in 2020 were demolished in 2021 and all boundary and on-site woodland/tree lines are being retained. If the footprint of the proposals result in any other features that are likely to be directly impacted (e.g. trees with moderate or high suitability) then further, more detailed bat roost surveys of trees will be required of specific features to inform mitigation and a EPSML (European Protected Species Mitigation Licence) application should one be required, in accordance with best practice guidance. Compliance with the submitted EcIA can be secured by condition.

7.235 Effects from lighting have the potential to effect roosting bats within and close to the proposals and bats commuting to and from foraging areas during construction and operation. Some bat species are more sensitive to lighting and as the site is currently undeveloped and unoccupied, artificial lighting is minimal. Security and compound lighting is likely to be of a temporary nature and used only during the construction phase. Site activity will predominantly take place during daylight hours and is therefore not expected to cause significant disturbance to foraging or commuting bats. Security lighting where used during the construction phase is likely to be manually operated or on PIR (passive infrared) sensors and should not be on continuously, and given the rural nature of the site, it is unlikely that any security lighting would be often triggered. Therefore, through the retention of the majority of habitats on site that are of value to commuting and foraging bats, the retention and avoidance of roost sites; and the mitigation measures outlined in he submitted EcIA, there will be no adverse impacts on roosting or commuting / foraging bats and no significant effects.

7.236 In relation to badgers, no setts would be lost to accommodate the proposals. The EcIA confirms that standard best practice working methods will be implemented to minimise any risk of direct mortality to badgers. The design of the proposals, which includes the retention of the majority of habitats on site, strategic planting to shield the outlier sett from disturbance and other habitat creation, would ensure that there are no adverse impacts on badgers and no significant effects.

7.237 In relation to habitat impacts all woodland present within the site will be retained and measures embedded within the design to protect retained habitats during construction, including security fencing to protect from incursion. There will be no direct loss of woodland habitat. There will be no fragmentation of habitats, or of populations of species using woodland habitats, during construction. Boundary vegetation, such as hedgerows

connecting woodland sites will be retained, which will allow for connectivity across the site.

7.238 As noted within the submitted EcIA, during construction, there is the potential for dust and other pollutants (such as emissions from construction vehicles and oil-spills) which may impact woodland habitats. The implementation of standard environmental protection measures during construction will ensure pollution during construction will not affect the retained woodland. Where individual trees are removed (e.g. for access), the implementation of standard mitigation measures (such as nesting bird checks), will ensure there is no species mortality. Therefore, there are no impact pathways, either directly or indirectly, that would impact upon woodland habitats, resulting in no adverse impacts and no significant effects.

7.239 In respect of hedgerows there will be a loss of a small section of a defunct species-poor hedgerow during construction, to facilitate the construction of new footpaths. There is likely to be a temporary and short-term adverse effect on this habitat type, however, there will be replacement planting included elsewhere on site and therefore this effect is reversible. During construction, there is the potential that dust and other pollutants (such as emissions from construction vehicles and oil-spills) may impact hedgerows, but the implementation of standard environmental protection measures during construction will ensure pollution during construction will not affect the integrity of retained hedgerows. Furthermore, fencing the boundaries of working areas with appropriate standoffs, where required, will protect both above-ground vegetation and roots. The implementation of standard mitigation measures (such as nesting bird checks), will ensure there is no species mortality of any species using hedgerows during construction of the proposals. Enhancement of hedgerows (widening and strengthening through appropriate planting) would contribute to an overall net gain in this habitat type and over time would result in a beneficial impact.

7.240 In relation to protected species the Wildlife Trust have noted that the EcIA considers the potential for impacts on a range of protected species and that detailed surveys have been undertaken for species groups that follow established best practice, though they are all now dated. The Wildlife Trust confirm that the surveys demonstrate the likely impacts arising from the development and identify appropriate mitigation measures for each group of species.

7.241 While the surveys are dated, the Wildlife Trust have noted that the low ecological value of the land within the development footprint and the minimal loss of habitats means that the potential impacts and mitigation measures that have been identified remain valid (as of early 2025). Some additional surveys will be required prior to

commencement of the development and these are set out in the EcIA. Updated surveys will be required for bats for any trees that are subject to removal and an updated site wide survey will be required for Badgers. The Wildlife Trust have confirmed that surveys for the other species groups will not be required.

7.242 Chapter 7 of the EcIA sets out the detailed mitigation, compensation and enhancement measures that are required arising from this proposed development, which will be secured through appropriately worded planning conditions that shall include a Construction Environmental Management Plan (CEMP), Landscape and Ecology Management Plan (LEMP) together with other planning conditions including a nature friendly lighting strategy; these are all considered appropriate and necessary.

7.243 It is therefore considered that impacts on protected species have been suitably addressed.

Biodiversity Net Gain (BNG):

7.244 Due to the age of this application the development is exempt from the mandatory 10% BNG set out in the Environment Act 2021. Policy LP30 of the Local Plan sets out that a proposal will ensure no net loss in biodiversity and provide a net gain where possible, with large scale developments required to provide an audit of biodiversity losses and gains.

7.245 The proposals are however supported by a Biodiversity Net gain report and metric which demonstrate that the development results in a significant net gain of biodiversity: a net gain of 26.08% for area habitat units and a net gain of 15.43% for hedgerow units, as illustrated in the submitted biodiversity net gain metric and accompanying report.

7.246 The Wildlife Trust has confirmed that the submitted BNG assessment is of a high standard and makes appropriate assessment of the current baseline conditions, as well as predicted future habitats. They have however noted an error in relation to the classification of part of the Houghton Grange Grassland County Wildlife Site, but this change does not affect the principle of the development and only results in a minor change to the overall BNG assessment. As a result of this change the value of the baseline habitats is increased to 107 Biodiversity Units (BU), and the overall net gain reduced to 24.68%. However, this still represents a significant gain, and is line with local ‘Doubling Nature’ ambitions for a 20% net gain in biodiversity from development and the Wildlife Trust notes that this gain is realistic due to the significant area of natural greenspace proposed.

7.247 The Wildlife Trust have raised a query in relation to the location of the different grassland habitat types within the new natural

greenspaces; the proposed habitat map shows an area of better-quality new wildflower grassland around the development, to the north, while that adjacent to the Thicket and providing an extension to Houghton Grange Grassland CWS is shown as the less species-rich Modified Grassland type. The Wildlife Trust considers this to be a minor error as the proposals should be aiming for the better-quality grassland as an extension to the CWS and the Thicket, with which it could be managed as a wildlife rich natural greenspace, while the poorer grassland should be closer to the development, where it will receive greater recreational pressures. Whilst this amendment is likely to result in changes to the BNG assessment and scores, it would be likely to increase the level of net gain as the southern area adjacent to the Thicket and CWS is slightly larger than the northern area around the new housing. This amendment can be dealt with through conditions (LEMP) and future updates to the BNG metric once the detailed layout of the development is known at reserved matters stage.

7.248 The application scheme therefore exceeds the BNG target of 10% BNG for each habitat type; and notwithstanding the exemption, would exceed the minimum legislative requirements under the Environment Act 2021.

7.249 A number of neighbour objections have been received raising concerns in relation to the impact on biodiversity and existing wildlife. Whilst these are noted, the Wildlife Trust (as the LPA's Ecological consultant) have raised no objections to the proposals subject to conditions.

7.250 It is therefore considered that the impacts of the proposed development on biodiversity would be minimised such that it would not have a significant adverse impact on biodiversity and protected species and would ensure the provision of measures to achieve net gains, subject to the proposed mitigation and enhancement measures set out in the EcIA and the imposition of conditions. Therefore, subject to conditions it is therefore considered the proposed development would accord with paragraphs 187 and 193 of the NPPF (2024), policy LP30 of Huntingdonshire's Local Plan to 2036 and policy HWNP2 of Houghton and Wyton's Neighbourhood Plan (2018).

DRAINAGE AND FLOOD RISK:

7.251 The majority of the application site is in Flood Zone 1 as confirmed by the SFRA 2024, which means it has a low probability of flooding. There is a very small area at the southernmost tip of the application site which lies partially within Flood Zones 2 and 3, as shown on the updated 2025 Environment Agency maps. The application is supported by a Flood Risk Assessment (FRA) as the site area is greater than 1 hectare. The very small proportion of

the site within Flood Zone 3 is not material to the proposed development.

7.252 The FRA confirms that the area of the site in which hardstanding development is proposed is restricted to approximately 5 ha in the north-western most corner of the site. SuDS conveyance and storage systems have been proposed across the rest of the otherwise undeveloped site area including a proposed attenuation pond, with a capacity of 3,237 m3, together with a 4-8m wide swale. The report includes consideration of surface water sources, groundwater, sewer flooding and artificial sources to and from the site.

7.253 The FRA concludes that the site is not at risk of flooding from tidal and artificial sources, it is at low risk of fluvial flooding, there is a low risk of groundwater and low risk of sewer flooding, and the risk of surface water prior to mitigation varies across the site from low to high. In respect of mitigation measures, the primary mitigation required is the implementation of a suitable surface water drainage strategy to ensure that the risk of surface water is managed and there is no increase in sewer flooding risk as a result of the application proposals.

7.254 A surface water drainage scheme has been submitted which sets out how surface water will be attenuated on the site and discharged to the existing drainage ditch at a controlled rate (via the attenuation pond), so that the risk of surface water and sewer flooding to the site and surrounding areas is low.

7.255 The LLFA has fully reviewed the submitted documents and raises no objections to the proposals, noting that the submitted documents demonstrate that surface water from the proposed development can be managed and treated through the use of permeable paving, raingardens and green and brown roofing transferred via swales and attenuated with a detention basin with surface water discharge from site being restricted to greenfield equivalents. The LLFA have noted support for using such features for their ability to treat surface water before discharge into receiving waters. It has also been noted that the existing site has little to no surface water flood risk and that water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual. The LLFA have proposed a number of conditions if approval is granted, which include full details of the surface water drainage scheme, details of measures for water run-off during construction, and a survey to be completed once the drainage scheme has been completed. These conditions are all considered to be necessary and acceptable.

7.256 The Environment Agency has reviewed the application and offers no comments.

7.257 Anglian Water has confirmed that foul drainage from this development is within the catchment of St Ives Water Recycling Centre, which has available capacity for the flows. In terms of the used (foul) water network, Anglian Water state they will need to plan effectively for the proposed development and work with the applicants to ensure any infrastructure improvements are delivered in line with the development, given capacity constraints. Anglian Water request conditions relating to a phasing plan and/or an on-site drainage strategy, as well as a scheme for on-site foul water drainage works; these are all considered to be necessary and should be secured. A number of informatives have also been requested.

7.258 It is noted that local objections have been received on the basis that the proposal will lead to increased risk of flooding elsewhere. In response and as noted, the LLFA, Environment Agency and Anglian Water have raised no objections to the proposals subject to conditions.

7.259 On the whole, and subject to the conditions noted above, officers consider the proposed development is considered to be acceptable with regards to flood risk and drainage and is therefore compliant with the NPPF (2024), policies LP5 and LP6 of Huntingdonshire's Local Plan to 2036 and policy HWNP14 of Houghton and Wyton's Neighbourhood Plan (2018).

LAND CONTAMINATION:

7.260 The NPPF 2024 in paragraphs 196 to 201 refers to ground conditions and pollution. Paragraph 197 specifically refers to where sites are affected by contamination and states that the responsibility for securing safe development rests with the developer and/or landowner.

7.261 Huntingdonshire's Local Plan to 2036 policy LP37 sets out the Council's approach in relation to ground contamination and groundwater pollution. This requires investigation as to the risk and remediation where necessary.

7.262 The application is supported by a Phase 1 land contamination assessment which recommends further assessment and discussions with the Local Planning Authority be undertaken, given the history to the site.

7.263 The Council's Environmental Health Officer has fully reviewed the submitted assessment and considers that the site is suitable for the proposed use subject to conditions, including a phase 2 land contamination assessment. The officer has noted that the majority of the site is 'greenfield' with the exception of the former Leucosis Unit and that the site had Made Ground, but the extent has not

been delineated. As hydrocarbon contamination has been identified around the former Leucosis Unit this area should be remediated as a “hotspot”, particularly as it appears to be located close to proposed residential development. The officer has concluded that intrusive ground investigation work has been very limited so a full Phase 2 land contamination investigation is recommended which targets the former Leucosis Unit with a less intensive investigation of the ’greenfield‘ land. Whilst further details are required these can therefore be secured by condition.

7.264 The proposed development is therefore considered to be acceptable subject to conditions in relation to ground conditions and contamination and therefore complies with the NPPF 2024 and Policy LP37 of Huntingdonshire’s Local Plan to 2036.

S106 CONSIDERATIONS:

7.265 The adopted Developer Contributions SPD 2011 (DCSPD) sets out the categories of contribution which the Council will seek to negotiate following the introduction of its Community Infrastructure Levy (CIL) Charging Schedule. Contributions vary according to the scale of residential development.

7.266 Whilst this application is for up to 120 dwellings, it is part of the wider St Ives West allocation. As such, this triggers the wider range of contributions appropriate to a large-scale major development. Policy LP4 sets out that where allocated sites are subdivided, contributions will be calculated on the complete developable area and apportioned appropriately.

7.267 Without prejudice to the eventual determination of the planning application, negotiations have been held with the Applicant in order to determine the extent of the obligations required to make the development acceptable. These negotiations have been held in line with the advice within the Regulations and the outcome is summarised below.

7.268 The Developer Contributions SPD sets out within part 2 that in determining infrastructure needs, the Council and partners have had to translate dwelling numbers into population generation. This has been undertaken utilising the anticipated change in average household sizes. For the purposes of calculating the likely infrastructure requirements, the 2016 average household size has been used (2.19 people per household). With the application seeking permission for up to 120 dwellings this equates to (120 x 2.19) 262.8 (rounded up to 263) people.

Community Infrastructure Levy (CIL)

7.269 The development will be CIL liable in accordance with the Council's adopted charging schedule; CIL payments could cover infrastructure relating to footpaths and access, health and community facilities.

7.270 This application has been submitted in outline form, but on the basis of 120 dwellings CIL receipts would likely be in the order of £1,073,088 (at a rate of £149.04 per sqm based on 72 market dwellings each with 100sqm floorspace). As Houghton and Wyton parish have an adopted Neighbourhood Plan, 25% of CIL receipts would go directly to the parish (CIL receipts to H&W PC would therefore be in the order of £268,272) however total figures can only be determined following approval of reserved matter details once the scale of the dwellings is finalised.

Affordable Housing

7.271 In accordance with LP24 and Section A of the Developer Contributions SPD this development should seek to achieve a target of 40% affordable housing.

7.272 Of the proposed 120 dwellings this would represent a total of 48 affordable units. The supporting text at paragraph 7.9 of the Local Plan clarifies that the expectation is that this is a mix of 70% social or affordable rented, and 30% shared ownership units. Policy does however acknowledge that, in determining the amount and mix of affordable housing to be delivered, site specific considerations and other material considerations, including viability, will be taken into account. In this instance, no site specific considerations have been submitted and therefore the proposal shall provide policy compliant affordable housing provision at 40%.

7.273 The applicant has agreed to provide affordable housing on site and the location and distribution will be agreed as part of any subsequent reserved matters application with the Council's Affordable Housing Officer. The exact mix of units in terms of tenure, scale and appearance will be the subject of planning obligations contained within a Section 106 agreement, which will need to be reflected within the subsequent reserved matters submission.

7.274 This approach is acceptable to Officers and subject to final wording within the S106 Agreement, the scheme is supported with provision of on-site affordable housing in accordance with Policy LP24 and section A of the Developer Contributions SPD.

Green Space

7.275 Policies LP3 and LP4 of Huntingdonshire's Local Plan to 2036 and Part B of the Developer Contributions SPD requires proposals to

provide the development specific land for informal and formal green space.

7.276 In accordance with the Developer Contributions SPD (based on a scheme of up to 120 dwellings) this development should provide 0.557 ha of informal green space on-site and due to the scale of the development formal green space can be negotiated.

7.277 The nature of the development results in a significant over provision of green space on the site. The scheme provides 17.66 ha of open space which is well in excess of the 0.557 ha area required by the Developer Contributions SPD for 120 dwellings. This open space will comprise amenity space, wildflower meadows, a linear park (comprising a LAP) and a children's play area (comprising a LEAP). The improvements to pedestrian connectivity to existing adjacent developments and the Thicket will also increase access for future residents.

7.278 Approximately 16.8 hectares of the strategic green space land is to be secured as an extension to the publicly accessible green space ("Berman Park") secured as part of the S106 package agreed for the Barratt development on the former golf course, which together with the space secured at The How development (part of the wider site allocation), creates one wider publicly accessible area.

7.279 The Developer Contributions SPD details a cascade mechanism for future management and maintenance of informal green space with the land first offered to the Town/Parish Council for adoption, then the District Council and then taken on by a Management Company. The usual cascade mechanism in the SPD is to be included in the Section 106 in order to secure the long-term management and maintenance of the areas of shared open space. A Landscape Maintenance contribution (using the updated costs for 2024/2025) will be secured through the S106 Agreement in the event that the open space is to be transferred to the District or Parish Council.

7.280 A similar cascade will be proposed in respect of the strategic green space land, but with this first being offered to the District Council, then Parish Council and then taken on by a management company. A Landscape Maintenance contribution will also be secured for the strategic green space land.

Outdoor Sports Provision

7.281 On 26th June 2025 Houghton and Wyton PC requested financial contributions to improve existing parish land for sports and recreation provision, together with new land and infrastructure

within the application site, to provide a new, flexible community sports and recreation facility.

7.282 Part B.9 of the Developer Contributions SPD requires proposals to provide Outdoor sports provision on a negotiated basis. Paragraph B.31 of the SPD states that "*Large scale major developments may also require, in addition to provision of LEAPs/NEAPs, Multi-Use Games Areas (MUGAs) and wheeled sports areas. It is recognised that MUGAs and wheeled sports areas serve large areas of population and therefore the decision to request these facilities may vary depending on existing local facilities….These will be negotiated on a case-by-case basis."*

7.283 The HDC Open Space Officer has previously advised that a LEAP/LAP should be provided in the play areas to cater for the children on this development (a LAP for the under 6 age group and a LEAP for children aged 6 and above). It is noted that no officer request has been made for a MUGA on site.

7.284 The HDC Strategic Sports Development Officer has requested an offsite contribution of £72,401,40 towards formal outdoor sports provision. The officer has noted that the Huntingdonshire Playing Pitch and Outdoor Sports Strategy (December 2022) outlines that facilities within Houghton require support to be able to increase sports provision in the area; the football pitches require additional maintenance, ancillary provision which supports Football, Cricket and Bowls has been identified as needing development and the tennis courts require sports lighting to increase its capacity.

7.285 The HDC Strategic Sports Development Officer has undertaken some initial discussions with Houghton and Wyton Parish Council to discuss potential formal outdoor sports provision projects which this contribution could support. A specific project can be identified in due course to support formal sports in the village, to enhance existing provision.

7.286 Whilst Houghton and Wyton Parish Council have requested a MUGA on site, the Huntingdonshire District Council Playing Pitch and Outdoor Sports Strategy Document (December 2022) does not identify a strategic need for a MUGA facility in either St Ives or Houghton and Wyton parish. There is already existing sports provision in the immediate area at St Ivo outdoor centre (located 700m to the north of the site) which comprises two tennis courts, a hockey pitch, a full sized floodlit astro pitch and several grass pitches. Within the development there is adequate space for informal activities to be played. The HDC Open Spaces officer has previously advised that a MUGA is not required and the HDC Strategic Sports Development Officer has not made a request for such.

7.287 On the above basis it is not considered that the Parish Council request for a MUGA on site is acceptable as it does not meet an identified strategic or site need and is not necessary to make the development acceptable in planning terms.

7.288 The obligation to secure a financial contribution (£72,401,40) towards formal outdoor sports provision in the parish of Houghton and Wyton is however considered to meet the statutory tests and is compliant with policy and the SPD. The Applicants have agreed to provide the financial contribution in-line with the above request.

Footpaths And Access

7.289 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part C of the SPD relates to the provision of footpaths and access and also notes that large-scale development should follow policies and strategies to ensure they take place in a sustainable way.

7.290 As referred to elsewhere in this report, this application offers the potential to connect into pedestrian links across The How through to The Spires that was secured as part of the adjacent development. Full details of an adoptable standard cycle/pedestrian link to the east can be secured through the submission of reserved matters.

7.291 Details of links to the south towards the Thicket can also be secured through the submission of reserved matters, to create secure safe links to the surrounding green space, although as noted elsewhere in this report, the levels of this path will mean the route is not suitable for all users.

Health

7.292 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part D of the SPD refers to health service facilities. Within paragraph D.10 the SPD states that the Council will negotiate with the prospective developers with a view to securing the necessary health service facility needs for the development. The SPD sets out how this will be assessed.

7.293 The NHS Cambridgeshire and Peterborough Integrated Care System (CAPICS) has confirmed that a contribution of around £119,074 would be required towards healthcare provision, calculated on the average person yield from the number of dwellings provided (being 120 in total); it would however need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.294 CAPICS have confirmed that this contribution would be used towards refurbishment/ extensions to the Spinney Surgery in St Ives (or primary care-led facilities and associated infrastructure within the local Primary Care Network or successor body). Officers consider that whilst no specific healthcare project has been identified, services are provided for in the local area and is therefore considered sufficient to meet the needs of the development.

7.295 The Applicants have agreed to provide a financial contribution towards health services with the above request from the NHS Cambridgeshire and Peterborough Integrated Care System.

7.296 Officers consider this financial amount to be the requirement to mitigate the impacts of the development in terms of health provision and would be required in accordance with policy LP4 and section D of the Developer Contributions SPD.

Community Facilities

7.297 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part E of the SPD relates to the provision of community facilities (the SPD notes that these include such buildings as village halls, faith and cultural facilities).

7.298 The provision of social and community facilities is set out as being a requirement within the St Ives SI I allocation, however neither the Local Plan allocation nor supporting text sets out specifically what should be included. No direct provision of such facilities are proposed on site as part of the current application scheme and no specific community facility building has been identified as being required on-site. In extensive consultation with the Parish Council no identification of the need for community facilities has been made, nor any request received for improvements to any existing facilities.

7.299 No project has been identified for a contribution towards off-site community facilities in the area and therefore no contributions have been sought.

Libraries And Lifelong Learning

7.300 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part F of the SPD relates to the provision of library facilities.

7.301 The County Council have stated that there is insufficient capacity in St Ives town centre library. In order to mitigate the impact of the additional population, a project has been identified to modify the internal layout and allow for additional shelving units and

resources. A cost has been calculated at £59 per head of new population.

7.302 A contribution of £17,700 is therefore sought to purchase additional furniture, equipment and resources and mitigate the impacts of this development on library provision. This has been calculated on the likely population yield from the development at 120 dwellings; it would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.303 The Applicants have agreed to provide a financial contribution towards libraries and lifelong learning in-line with the above request from Cambridgeshire County Council.

7.304 It is considered necessary to ensure the development has adequate library facilities, in accordance with policy LP4 and section F of the Developer Contributions SPD.

Education And Schools

7.305 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part G of the SPD relates to the provision of education facilities.

7.306 The County Council, as Education Authority, have provided a detailed response regarding education capacity relating to early years, primary and secondary education.

Primary Education And Early Years:

7.307 The County Council has confirmed that 48 Primary School age children and 36 Early Years age children are forecast to be generated by this development. These have been calculated on the likely population yield from the development at 120 dwellings; it would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.308 Of the 36 Early Years children it is advised that 21 children will be eligible for a combination of 15 and 30 hour free spaces and these children equate to 14 full-time classroom spaces within the Early Years setting.

7.309 There is one childcare provider (Thorndown pre-school playgroup) and five childminders in the area, with a total capacity of 71 15-hour places. The forecast demand of 240 x 15-hour places exceeds the current capacity (a deficit of 169 15-hour places).

7.310 The Council will meet the demand for early years places from this and other development by expanding capacity within the St Ives. The details of the specific project are not committed and therefore in accordance with latest Department for Education guidance it is appropriate to secure contributions based on the DFE Scorecard costs, which for the creation of new early years settings in Huntingdonshire is £21,757 per place (indexed from Q4 2023).

7.311 In order to mitigate the impact of the development on early years provision a contribution of £304,598 (14 x £21,757) is requested. As noted, the final amount would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.312 Thorndown Primary School was expanded in anticipation of the St Ives West allocation; this project forward funded the expansion to provide an additional 1FE (210 spaces). The total cost of the project to expand Thorndown Primary School by an additional 1FE is £6,715,943 (based on 2014 cost with PWLB interest applied to 4Q2024). As set out above this development is expected to generate demand for 48 primary education places.

7.313 Therefore, a contribution of £1,535,073 is requested to mitigate the development impacts of 48 primary places. As noted, the final amount would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.314 The obligations are considered to meet the statutory tests and is compliant with policy and the SPD. The Applicants have agreed to provide a financial contribution towards Primary Education and Early Years in-line with the above request from Cambridgeshire County Council.

Secondary Education:

7.315 The County Council has confirmed that 30 Secondary School age children are forecast to be generated by this development.

7.316 The County Council have confirmed that there will be sufficient capacity at St Ivo School and therefore no contributions are sought in relation to this planning application.

Residential Wheeled Bins

7.317 In accordance with Policy LP4 of Huntingdonshire's Local Plan to 2036 and the Developer Contributions SPD (Part H) each dwelling will require the provision of one black and blue wheeled bin (green

bins are payable separately per year as requested by occupiers). The current cost of such provision is £114 per dwelling. For flats, communal 1100 litre bins could be provided rather than individual bins for each dwelling. The current cost for communal bins is £669 each.

7.318 The amount required would be based on a per dwelling calculation, of £114 per dwelling, up to a maximum of £13,680 at 120 dwellings. Any shared bins, such as those serving flats, would require a contribution on the basis of £669 per bin. This would be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.

7.319 It is considered necessary to ensure the development has adequate waste infrastructure, in accordance with policy LP4 and section H of the Developer Contributions SPD.

S106 Summary

7.320 In summary, the following contributions have been identified as being required by the adopted Developer Contributions SPD, or requested by consultees:

- That 40% (up to 48 units) of the dwellings provided affordable, as defined within the NPPF (with an expected provision of 70% to be provided as social or affordable rented properties and 30% shared ownership properties).
- Land to be provided as Public Open Space.
- £72,401,40 towards formal outdoor sports provision in the parish of Houghton and Wyton
- £119,074 towards refurbishment and extensions at the Spinney Surgery.
- £304,598 towards Early Years settings.
- £1,535,073 towards the expansion of Thorndown Primary School.
- £17,700 towards enhancements at St Ives Library.
- Contribution towards provision of wheeled bins of £114 per dwelling (total of £13,680 based on 120 dwellings) or £669 per communal bin.

7.321 Statutory tests require that S106 planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. S106 obligations are intended to make development acceptable which would otherwise be unacceptable in planning terms.

7.322 All of the obligations are considered to meet the statutory tests and are compliant with relevant policies and the Developer Contributions SPD. The planning obligations set out above have been agreed by the Applicants and are considered to mitigate the development in accordance with policies LP3, LP4, LP24 and the Developer Contributions SPD.

Other matters:

7.323 Cambridgeshire Fire and Rescue have requested that the provision of adequate fire hydrants is secured by condition. The imposition of such a condition is considered acceptable and would meet the statutory tests.

7.324 As noted earlier in this report, there has been a significant number of objections to the proposals raised by Houghton and Wyton Parish Council together with neighbouring Town and Parish Councils, as well as from local residents. In respect of these objections and as detailed above, there are no outstanding concerns from any statutory consultees including the LLFA in respect of flooding and drainage concerns and the CCC Highways or Transport Assessment teams. The HDC Urban Design officer has undertaken a full and detailed review of the densities of nearby developments in the local area and is supportive of the amended proposals. In respect of landscaping matters, the LVA is adequate and the landscape and visual effects of the proposed development are considered to be acceptable. There are also no concerns raised by the HDC Conservation Officer or HDC Environmental Health officer.

7.325 A number of neighbour objections have been received raising concerns in relation to the impact of the proposals on existing services (hospitals, schools, doctors and dentists). On the basis of requests made by CCC and the NHS it is considered that the impacts of the development can be mitigated through securing financial contributions towards enhancing existing services.

7.326 In respect of a detailed response to the various concerns raised by Houghton and Wyton Parish Council, these are set out below, along with an officer response/ commentary.

Concerns raised in relation to the development being contrary to policies within the Huntingdonshire Local Plan to 2036:

Concerns the proposals do not protect the character of Houghton and Wyton, contrary to LP2 – Strategy for Development:

7.327 Paragraph 4.4 of Huntingdonshire's Local Plan to 2036 specifically states that to promote deliverability of LP2 the policy is complemented by a series of allocated sites, set out in Section D: 'Allocations'. The allocations (in this case SI 1 St Ives West) have been chosen as they meet the objectives of the development strategy, with criteria for their comprehensive and sustainable development set out separately within the allocation. As such, the assessment of the site in this instance should be guided by the criteria set out within the allocation alongside other policies within the Local Plan, with the exception of LP2 which through the process of allocation it has already been met.

Concerns that the proposals do not contribute to the landscape, wildlife, cultural and historical value of the area, contrary to LP3 – Green Infrastructure,

7.328 Policy LP3 states that proposals will be supported where it demonstrates compliance with a number of objectives. These include incorporation of open/.green space in accordance with the SPD; protecting and enhancing existing green infrastructure; and maintaining and enhancing the rights of way network.

7.329 The submitted Parameter Plan illustrates significant open and green space in excess of policy requirements and the existing PROW network is maintained. The application site is not within the Great Ouse Valley Landscape Character Area (although the southern boundary of the site is located adjacent) but the adjacent land to this is not proposed for any built development.

7.330 Paragraph 11.6 of the Local Plan specifically provides further supporting information relating to tree preservation orders, an early restoration of Houghton Grange County Wildlife Site and appropriate ecological assessments. Likewise paragraph 11.7 requires that proposals reinforce the strategic green corridor along the River Great Ouse by allowing the southern part of the site to comprise a substantial area of publicly accessible green space. The application proposals therefore incorporate previous building lines and trees, as well as levels and slopes, to maximise its contribution to the Ouse Valley Landscape Character Area. The application proposals are considered to provide a separation from the River Great Ouse that reinforce the green corridor and contribution to the Ouse Valley Landscape Character Area by

providing semi-natural greenspace to the east and south, along with the retention of the Houghton Grange County Wildlife site.

7.331 Ecological enhancement is also proposed creating a 24.68% net gain in biodiversity) through the protection and enhancement of existing on-site habitat, including the County Wildlife Site within the site and the delivery of a significant area of green space land. This exceeds the statutory Biodiversity Net Gain provisions set out in the Environment Act 2021 and is considered to be in compliance with the allocation and supporting paragraphs.

7.332 This approach to recognising the intrinsic character and beauty of the countryside is enhanced by the provision of a variety of green spaces which includes semi-natural greenspace, meadowland and amenity green space. This not only provides substantial areas of natural greenspace (paragraph 11.3 of the Local Plan) but recognises the sensitivities of the site (paragraph 11.4) and provides active travel routes to allow access for not only residents, but also the wider residents living in the west of St Ives. The current application proposals provide for approximately 16.84 ha of green space and in combination the green space amounts to 26.4 ha across the wider St Ives west site, which exceeds the requirement for "*approximately 23ha of green space*" set out in criterion 1 of policy SI 1. In addition, the requirement for a management plan for all areas of green spaces can be secured, which addresses criterion K. This will ensure that the open space enhancements are preserved for generations to come.

7.333 As noted earlier in this report, the LVA has been fully assessed and it is considered that this provides an adequate assessment of the landscape and visual effects of the development. It is considered that the proposals ensure a sense of separation is maintained between developments at Houghton Grange and The Spires, as required under criterion g of Policy SI 1.

7.334 The proposals are therefore considered to support green infrastructure and are in accordance with Local Plan Policy LP3.

Concerns that *the proposals do not recognise the intrinsic character and beauty of the countryside, contrary to policy LP10 – The Countryside:*

7.335 As set out earlier in this report, the site is allocated for development and therefore considerations relating to the intrinsic

character and beauty of the countryside were fundamentally dealt with at Local Plan stage ahead of the site being formally allocated.

7.336 Allocation SI 1 St Ives West sets out specific criteria to ensure that the impact on landscaping and countryside is taken into account in the development of the site. It indicates that successful development of the site will require: 'g. *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires'.* For the reasons set out previously the proposals are considered to accord with Policy SI 1 of the Local Plan and Policy LP10 is not an appropriate policy for the consideration of this application

Concerns that the proposals do not positively respond to its context and does not apply the guidance on the Huntingdonshire Landscape and Townscape Assessment (2022) contrary to policy LP11 – Design Context:

7.337 The criteria and supporting paragraphs set out within the Local Plan allocation are there to ensure that the landscape character can be sensitively addressed and provide benefit in terms of ecological and landscape value. As noted earlier in this report, the application site is situated within the Western Periphery LCA, but the southern boundary of the site is adjacent to the Great Ouse Valley LCA. The key characteristics of the Great Ouse Valley include a mosaic of land uses, related by their topography and relationship to the river, including a peaceful character and tranquillity. The Great Ouse Valley landscape character is valued for its recreational opportunities too, with a long distance footpath extending the whole length of the area. The application proposals allow for an enhancement of the Great Ouse Valley corridor by providing substantial open space in the south of the site. In addition it meets the requirements within the SPD for developments set out as follows:

'Development proposals should include:

- *protection and enhancement of a 'Green corridor' along the river to promote both its landscape and biodiversity benefits, including the use of native wetland trees to maintain the traditional vegetation of the area;*
- *promote opportunities for wildlife and conservation initiatives to support and enhance the area's biodiversity;*

- *encourage public access along the Great Ouse Valley."*

7.338 These current application proposals enhance the green corridor by providing semi-natural greenspace along with the retention of the Houghton Grange County Wildlife site, as well as delivering a net gain in biodiversity. The proposals also enhance active travel routes to allow access to the Ouse Valley way for not only future residents, but all those living in the west of St Ives. The proposals are therefore considered to positively respond to its context in accordance with Local Plan Policy LP11.

Concerns that the proposals do not contribute positively to the area's character and identity or integrate with topography and landscape, contrary to policy LP12 – Design Implementation:

7.339 The submitted Illustrative Masterplan is considered to contribute positively to the area's character and identity and integrates with the site's topography and landscape. As noted earlier, the density of the proposals is considered to be acceptable, being similar to The Spires and the Slepe Meadow development. As noted, the development area is located where previously buildings were situated on the site. Details relating to existing trees, as well as levels and slopes, to ensure the development would integrate with the topography and landscape of the site, would be considered at reserved matters stage.

7.340 The proposals are therefore considered to comply with Local Plan policy LP12.

Conflicts with the site allocation policy SI 1 and application of the 10% tolerance found in text at D8 of the Local Plan in an arguably unlawful way by failing to adopt a masterplan at the outset and then proceeding to rely on the 10% tolerance in plan text at D8 for this site rather than the application tolerance across the whole SI 1 allocation, leading to a demonstrable over-development of this site, the remaining parcel of the SI 1 allocation:

7.341 Within the Planning Inspector's final report into the Local Plan (April 2019) on the examination of Huntingdonshire's Local Plan to 2036, it was acknowledged that the SI I site had a complex planning history, with a number of planning applications and planning permissions in place for elements of the development prior to the adoption of the Local Plan. The report also acknowledged that the allocation is important in sustaining the role of St Ives in line with the overall spatial strategy, noting that there

were some issues to resolve in terms of bringing different elements of the site forward, but that there was a clear and definite interest in doing so. As such, the lack of a masterplan due to the commencement of certain elements of the site was not considered to impede its comprehensive delivery and, given that the remainder of the SI 1 allocation now has planning permission and is under construction/occupied, there is limited merit in requiring a masterplanning exercise solely for the remaining portion of the allocated land. In addition, paragraph 149 of the report noted that Policy SI 1 sets out appropriate criteria which will ensure a coordinated approach to delivery. It is therefore not considered that the site has been developed unlawfully and that the lack of a masterplan for the whole site does not impede comprehensive development of the site, especially when the policy is also supported by an indicative illustration designed to guide development in the same way as a masterplan and give an overall vision of the intention of the development of the site in a holistic manner, despite the submission of separate applications. This has allowed planning decisions to be guided by not only the policies, but also the overall illustrative vision for the site. As set out earlier in this report, the timing of the planning decisions on other parts of the allocated site is also relevant in how these schemes have come forward in a separate manner.

7.342 In addition, paragraph 188 of the Inspector's report specifically notes that *"..the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy*."

7.343 Huntingdonshire's Local Plan to 2036 includes at Section D: allocations paragraph D.8 that supports the approach towards to the supply of housing by allowing for a 10% tolerance either side of the approximate figure for allocations, noting that these capacities should be design-led. It can also be noted that paragraph D.8 sets out that where a scheme proposes a number outside of the variance it should be justified though the design and access statement, thereby supporting in principle a variation beyond the 10% tolerance.

7.344 The current application proposes up to 120 homes and taking the allocation in its entirety this amounts to 425 new homes across site allocation SI 1. This is within the 10% tolerance which would at its maximum total 440 homes. The current application proposals are considered to demonstrate a design-led approach to this capacity, which is in compliance with criteria g of the site allocation and by association paragraph 11.7 of Policy SI 1 which states that

"*housing development should be predominately situated in the northern part of the site and arranged in a series of clusters separated by green corridors running north-south through the site both to screen and separate areas of development and to connect through to the greenspace in the south of the site*". It is therefore considered that the applicants' approach to the number of dwellings proposed as part of the 10% tolerance is acceptable. Given that the allocation number refers to the whole site area and does not apportion numbers or density to each part of the site it is considered appropriate to apply the tolerance to the approximate figure for the whole allocation.

7.345 The proposals are therefore considered to comply with site allocation SI 1 and the text at paragraph D8 of the Local Plan.

Concerns raised that the development is contrary to the policies of the Houghton and Wyton Neighbourhood Plan:

Concerns that the development is outside the Houghton and Wyton built up area and is within the open countryside and does not comply with the relevant policies for building in the countryside, contrary to policy HWNP1 – Houghton and Wyton Built Up Area:

7.346 As noted earlier and set out in paragraph 3.9 of this report, Policy HWNP1 has no weight in this determination of this application due to being superseded by the site allocation SI 1.

7.347 As set out in paragraph 31 of the NPPF "*Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently*." Neighbourhood Plan policy HWNP1 is therefore considered to be superseded.

Concerns that the development does not respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives because it individually and cumulatively results in the loss of visual and physical separation between the two settlements and would lead to their coalescence, contrary to policy HWNP3 – Anti-Coalescence:

7.348 Houghton and Wyton Neighbourhood Plan is dated 2018, with Huntingdonshire's Local Plan to 2036 being adopted in 2019. The Local Plan to 2036 clearly sets out its strategic policies within page

4; these include "*all policies that allocate land for development in section D: 'Allocations' as they are required to achieve the strategy as set out 4 'The Development Strategy'*". This means that Policy SI 1 is a strategic policy within the Local Plan. Being the most recent of the plans, Policy SI 1 takes precedence (see paragraph 072 of the NPPG reference ID:61-072-20190315- Neighbourhood Planning in paragraph 7.6 of this report).

7.349 However, the intention of the Neighbourhood Plan policy for required separation is included within the allocation through criterion g of the policy which includes "*maintaining a sense of separation between developments at Houghton Grange and The Spires*" and a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network to enable integration with the wider Ouse Valley network. This is supplemented through paragraphs 11.7 and 11.9 of the Local Plan and the indicative illustration on page 197. This approach was endorsed by the Planning Inspector in paragraph 149 of the Inspector's final report.

7.350 As noted earlier, Policy HWNP3 is given significantly reduced weight in the consideration of this application, noting the conflicts between HWNP3 and the St Ives West site allocation SI 1.

7.351 The application proposals are considered to clearly demonstrate separation from Houghton Grange and The Spires with tree planting, reduced building heights on outer edges and specific landscaping, to provide a distinct transition from built development to open space east to west, and also leading to the south towards The Thicket and the River Great Ouse, in accordance with site allocation SI 1

Concerns that the submitted LVA does not demonstrate that the development complies with the NPPF, requiring that it contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes or recognises the intrinsic character and beauty of the countryside:

7.352 H&W PC have submitted four detailed reports during the consideration of the application; (i) a Review of the Applicant's Landscape and Visual Appraisal dated June 2023), (ii) Implications for Separation between Houghton and St Ives dated June 2023); (iii) a Review of the Applicants revised LVA dated October 2024; and (iv) a Review of January 2025 Landscape and Visual Appraisal dated February 2025.

7.353 The LVA reviews state there are deficiencies in the Applicant's LVA such that its conclusions cannot be relied upon and that the application proposals conflicts with policy on landscape matters. The Separation Report states that the development has implications for coalescence, urbanisation and impacts on openness such that it conflicts with policies.

7.354 A response to the concerns raised in these reports are detailed earlier in this report; but the Council's position remains (in accordance with the Council's Landscape Consultant) that whilst the methodological approach adopted in the LVA does not always reflect best practice, it is acceptable, and similar conclusions are reached on landscape and visual effects without relying on the methodology. The Council considers that the proposals are therefore in accordance with the requirements of Policy SI 1 of Huntingdonshire's Local Plan to 2036, including that a sense of separation is maintained between the developments of Houghton Grange and The Spires and that the proposals will enhance the natural and local environment.

Housing numbers and density concerns:

7.355 In respect of objections raised by H&W PC in relation to housing numbers and the density of development proposed, as noted earlier in this report, a detailed exercise has been undertaken by HDC's Urban Design Officer to compare the density of other developments in the area (calculated with the inclusion of development roads but not public open space to ensure consistency). This exercise has confirmed that the average density of the Slepe Meadow estate to the north of Houghton Road is 39.4dph, the dwellings backing onto Houghton Road on phase 1 of Houghton Grange have an average density of 16 dph, and the average density of the development East of the Lime tree Avenue (73 plots - Houghton Road phase 1) is 26.7 dph. It should be noted however that the site constraints of phase 1 Houghton Grange are unique with the existing landscape features, trees and listed buildings, which the development layout successfully responds to and as such the average density is lower than might be typically found on new build developments in both village and town environments.

7.356 The average density on phase 1 Knights Way (David Wilson Homes) at The Spires is 36.7 dph, with average density on phase 2 (Barratt Homes) being 32.3 dph, with a total average of 34 dph across The Spires development.

7.357 The current application (based upon 120 dwellings) would achieve an average density 31.4 dph; the proposals do not therefore result in overdevelopment and reflects an appropriate density that has

regard to the character of the immediate area and adjacent developments.

7.358 Whilst H&W PC are seeking a reduction to the quantum of housing proposed as they consider that there are no viability grounds for not doing so, the proposals will deliver a development in accordance with Policy SI 1 of the Local Plan. Improvements have been made during consideration of the application in respect of increased set backs along Houghton Road, a reduction in building heights, and the eastern edge of the development has been pulled back, as detailed on the latest Parameter Plan.

Coalescence concerns:

7.359 H&W PC maintain that the proposals fail to grasp that the development is attached to Houghton Grange Phase 1 and is an extension of Houghton and Wyton village, rather than the town of St Ives itself, and that if approved without further amendments, the two distinctly different settlements will be linked. The PC also consider that the proposed development is still located too close to Houghton Road and that by infilling this land the proposal does not correspond with the Local Plan policy illustration, all of which increases the actual and perceived sense of coalescence, which would result in planning harm. Objections are also made in respect of the play area proposed within the 'gap/ green wedge'.

7.360 The Council's Landscape Consultant has concluded that the site is already perceived as being within St Ives (within the Western Periphery Character Area) and that the gap between St Ives and Houghton and Wyton is already experienced as the land between the Houghton Grange Phase 1 development, the most westerly part of the SI 1 Allocation, and the eastern edge of Houghton. This will not change as a result of the proposed development.

7.361 With regard to objections in respect of the play area proposed within the 'gap/ green wedge', this element of the proposals has since been removed from the latest Parameter Plan. As detailed earlier in this report, the latest Parameter Plan illustrates a gap that varies in width, which at its northern end is approximately 145m wide. This gap, alongside the development being set back from Houghton Road and lower building heights around the southern and eastern edges of the housing development area and along Houghton Road alongside significant tree planting, is considered to ensure that the sense of separation between the developments at Houghton Grange and The Spires is achieved, and the proposals accord with Policy SI 1.

Engagement concerns:

7.362 H&W PC state that they have sought to engage with HDC and Homes England in relation to an alternative proposal for the site, but that this has been rebuffed. Concerns have also been raised in relation to missing / out of date information submitted, inadequate levels of engagement, substantial amendments and resubmissions, nearly 270 documents and postings online and thousands of pounds of tax-payers' money being spent on professional help to support and ensure planning policies are adhered to and a positive outcome for all is achieved.

7.363 In response, amendments made to the proposals have included revised plans and details that have responded to both statutory and non-statutory consultee responses. In respect of the last (fifth) consultation this took place following the submission of an amended Transport Assessment; this consultation was undertaken as a number of comments have been raising concerns in respect of highways related matters (from both neighbours and PC's). Throughout the consideration of this application the additional information that has been received has all been placed onto the public file (noting some documents are large in file size so have needed to be broken down) with any superseded documents clearly labelled as such, so it is clear which are the amended documents and plans to review.

7.364 HDC have facilitated two meetings between H&W PC and Homes England (in February and July 2024), which have resulted in amended documents being submitted. Homes England have engaged with the local community since their initial community engagement on the proposals in the summer of 2018 and there has been extensive engagement with stakeholders, including Parish and Town Councils, both before and since the current planning application was submitted in April 2023. It is therefore considered that adequate levels of engagement have taken place in respect of these proposals and that officers have adopted an appropriately participative process which has allowed the Parish Council (including adjacent PC's) and local residents a full opportunity to comment on the proposals where amendments have been received.

Highways concerns:

7.365 H&W PC have also raised objections in respect of transport impacts, noting that there are capacity issues along Houghton Road. In response to this, additional information has been submitted which has been fully consulted upon with the public and Parish Councils. As noted, the CCC Transport Assessment team have now reached a position where, subject to conditions, there are no objections to the proposals from a highways perspective.

Flooding concerns:

7.366 H&W PC also note concerns in relation to flooding, including capacity issues and the potential for flooding downstream. As noted earlier in this report, the LLFA raise no objections to the proposals and neither do the Environment Agency or Anglian Water, subject to conditions.

Request for a MUGA and car parking area:

7.367 H&W PC have requested the inclusion of a MUGA and public car parking as part of the proposals (alongside a reduction in the number of dwellings on site). The current Parameter Plan does not include for either of these facilities and no request for such has been made by the Council's Open Space officer or Sports Development officer. The Huntingdonshire District Council Playing Pitch and Outdoor Sports Strategy Document (December 2022) does not identify a strategic or site need for such a facility and there is already existing provision in the immediate area at St Ivo outdoor centre, as set out earlier in this report. It is not therefore considered that the Parish Council request for a MUGA on site is acceptable as it does not meet an identified strategic need and is not necessary to make the development acceptable in planning terms.

Other decisions:

7.368 H&W PC have also raised objections in respect of other applications recently determined by the District Council, which includes application reference 24/02275/FUL (see footnote below paragraph 5.4 in this report for details of this proposal). H&W PC consider that reason for refusal number 2 on 24/02275/FUL ("*The proposed introduction of 3-4 storey, built form on this undeveloped site within the countryside would have a detrimental urbanising effect and it would erode the existing green character of the site and its contribution to the tranquil setting of the lake. By virtue of its size, scale, massing and design the development would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area which has landscape and biodiversity value. Therefore, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP3, LP10, LP11 and LP12 of the Huntingdonshire's Local Plan to 2036 and the NPPF 2024*") is comparable to the application site. In response, every application is determined on its own merits. Having regard to that the Meadow Lane proposal and decision, it is considered that the Meadow Lane proposal is not directly comparable given (amongst a variety of reasons) it has a lakeside setting and is not an allocated site for development within the Local Plan.

Conclusion:

7.369 Whilst consideration and regard has been given to comments received from Houghton and Wyton Parish Council, it is considered that the objections raised do not materially change the judgments contained in this report nor the recommendation, for the reasons identified and set out above.

CONCLUSION AND PLANNING BALANCE:

7.370 As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6)) determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Town and Country Planning Act 1990 (Section 70(2)) states that in dealing with planning applications the Local Planning Authority shall have regard to have provisions of the development plan, so far as material to the application, and to any other material considerations.

7.371 The NPPF (2024) is a material consideration carrying significant weight. A revised NPPF was published in December 2024, introducing a substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements. This has resulted in the Council being unable to demonstrate a five year housing land supply (5YHLS).

7.372 In those circumstances, the presumption in favour of sustainable development is applied for decision-taking in accordance with paragraph 11 (d) and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as 'the tilted balance'.

7.373 While no 5YHLS can be demonstrated the Local Plan policies concerned with the supply and location of housing as set out in the Development Strategy chapter (policies LP2, LP7, LP8, LP9 and LP10) of Huntingdonshire's Local Plan to 2036 are considered to be out-of-date and can no longer be afforded full weight in the determination of planning applications. Allocation Policy SI 1 can however still be afforded significant weight in the determination of this planning application.

7.374 NPPF (2024) paragraph 11 states (as relevant):

'Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance (7) provides a strong reason for refusing the development proposed; or*

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

7 Footnote 7 states: The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.'*

7.375 As outlined in the report, in light of the advice from technical consultees, there are no strong reasons for refusal in relation to any habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest, Local Green Space, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75) and areas at risk of flooding. In those circumstances, paragraph 11(d)(ii) must be considered and thus the 'tilted balance' is engaged. The balancing exercise should be carried out to determine whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF (2024) taken as a whole.

7.376 The application seeks outline planning permission with all matters reserved for the erection of 120 dwellings on land between Houghton Grange and The How, Houghton Road, Houghton.

7.377 The site is allocated for development under Local Plan allocation SI 1, a policy which is not considered to be out of date; as a matter of judgment, Policy SI1 is afforded significant weight in the determination of this planning application.

7.378 The Houghton and Wyton Neighbourhood Plan was adopted in 2018. As set out in paragraph 31 of the NPPF "*Once a neighbourhood plan has been brought into force, the policies it*

contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently." Neighbourhood Plan policy HWNP1 is therefore considered to be superseded by site allocation Policy SI 1 and HWNP3 is given significantly reduced weight, noting the conflicts between HWNP3 and the St Ives West site allocation SI 1.

7.379 The application proposals are considered to accord with the requirements set out under Local Plan allocation SI 1. In particular, this final phase delivers a significant amount of green space and maintains a sense of separation between the developments at Houghton Grange and The Spires.

7.380 It is considered that the application site could satisfactorily accommodate up to 120 dwellings and the general layout could be made acceptable for reserved matters applications.

7.381 The proposed access is considered to be safe and acceptable in highway terms and the level of traffic generated by the development through the additional trips is not considered to be severe.

7.382 The majority of the application site is located within an area at the lowest risk of flooding (Flood Zone 1), and is therefore acceptable in principle in terms of flood risk and drainage.

7.383 In terms of the social dimension of sustainable development, the site appears to have no significant constraints and is deliverable. It would also increase the supply of housing, contributing up to 120 homes towards the housing supply on an allocated site; significant weight is afforded to this. The proposal will also result in the delivery of 40% affordable homes towards a significant district affordable need and substantial weight is afforded to this. As there is a local identified need for both private and affordable housing thus there would be a net benefit in social terms.

7.384 In terms of the economic dimension of sustainable development, the proposal would contribute towards economic growth, including job creation - during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. Moderate weight is afforded to this.

7.385 In terms of the environmental dimension of sustainable development, the proposal offers potential for the incorporation of energy efficiency measures (to be considered in detail at reserved matters stage) as well as the delivery of a net gain in biodiversity. The application site constitutes a sustainable location for the scale of development proposed in respect of access to local

employment opportunities, services and facilities within the wider St Ives Spatial Planning Area; and is accessible by sustainable transport modes, with walking and cycling opportunities to St Ives, Houghton and further afield. Moderate weight is afforded to this.

7.386 The proposals will also deliver a significant extension to the publicly accessible “Berman park” (country park) secured on the former St Ives Golf Course, to connect the site to St Ives and formalising the sense of the space and public access to the south. Significant weight is afforded to this.

7.387 Financial contributions will be secured to support local infrastructure and moderate weight is afforded to this.

7.388 Less than substantial harm has been established to two Conservation Areas, a Grade II listed building and its curtilage listed Gate Lodge, which are all identified designated heritage assets, with the harm in each case being at the lower end of the scale. Substantial harm has been identified to one non-designated heritage asset (ridge and furrow) which must be taken into account applying a balanced judgment. Although considerable importance and weight must be given to the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990, applying Section 16 of NPPF (2024), the heritage harm here both individually and cumulatively would be outweighed by the public benefits as set out within this report.

7.389 The visual and landscape impacts of the proposed development are not considered to be significantly adverse and it is considered that a clear sense of separation is maintained between the developments at Houghton Grange and The Spires.

7.390 The proposals are in accordance with Policy SI 1 of the Adopted Local Plan and the Development Plan when taken as a whole. Applying paragraph 11 of the NPPF (2024), the identified harm would not significantly and demonstrably outweigh the identified benefits when assessed against the NPPF (2024) taken as a whole.

7.391 There is an overriding need for the development given the lack of a five-year housing land supply and having had regard to the site-specific development allocation in the Adopted Local Plan as set out in Policy SI1 St Ives West.

7.392 Having fully assessed all three objectives of sustainable development; economic, social and environmental within this report, the proposed development achieves these overarching objectives, and Officers consider the collective material benefits of the proposed development firmly outweigh the identified harm. Applying s.38(6) of the PCPA 2004, the proposed development is in accordance with the Development Plan and there are no

material considerations which indicate that permission should be refused.

7.393 The application is therefore recommended for approval subject to conditions as follows and completion of a S106 Agreement.

8. RECOMMENDATION - POWERS DELEGATED to the Head of Planning, Infrastructure & Public Protection to APPROVE subject to conditions and completion of a Section 106 obligation:

- Time limit
- Approved plans (site location plan and parameter plan)
- Submission of reserved matters (appearance, landscaping, layout and scale)
- Approved site principles as shown on parameter plan and conformity statement to be submitted with reserved matters (including justification of any minor variances)
- Phasing with reserved matters (for CIL)
- Finished floor and site levels to be submitted with reserved matters
- Materials to be submitted with reserved matters
- Details of Surface Water Drainage Scheme to be submitted with reserved matters
- Details of surface water run off during construction
- Surface water drainage system completion report
- Details of foul water drainage scheme to be submitted with reserved matters
- Land contamination assessment (phase 2), remediation strategy and any unexpected contamination
- Construction Environmental Management Plan (CEMP)
- Layout, visibility splays, parking provision, turning and loading areas with reserved matters
- Road construction, management and maintenance details
- Roads to binder course prior to occupation
- Landscape and Ecological Management Plan to be submitted
- Compliance with Ecological Impact Assessment Report
- Works during bird breeding season
- BNG metric to be submitted with reserved matters
- Tree survey, arboricultural method statement and tree protection plans with reserved matters
- Timescales for delivery of Houghton Road frontage tree planting to be submitted with reserved matters
- Details of pedestrian and cycle links to adjacent sites to be submitted with reserved matters
- Public Rights of Way scheme to be submitted
- External lighting details to be submitted with reserved matters
- Dwellings accord with M4(2) of the Building Regulations

- Housing mix in accordance with LP25 as part of reserved matters
- Water efficiency (Building Regs doc G)
- Details of bin and cycle stores to be submitted with reserved matters
- Fire hydrants
- Play equipment (LEAP and LAP), seating and bin details
- Noise assessment to be submitted with reserved matters
- Residential Welcome Pack
- Installation of MOVA at the site access signal controlled junction with the A1123 prior to occupation (unless provided by Morris Homes in the meantime under S278 works)
- Details of broadband connection to be submitted with reserved matters
- Details of ELVC to be submitted with reserved matters

OR

REFUSE in the event that the obligation referred to above has not been completed and the Applicant is unwilling to agree to an extended period for determination, or on the grounds that the Applicant is unwilling to complete the obligation necessary to make the development acceptable.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

CONTACT OFFICER:

Enquiries about this report to **Laura Fisher, Senior Planning Officer, Strategic Team** - email laura.fisher@huntingdonshire.gov.uk

RICHARD BUXTON
solicitors
environmental • planning • public law

[redacted]

Planning Development Control
Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon PE29 3TN

Our ref: HOU1/2/LPF
Your ref: 23/00627/OUT

28 June 2023

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

RE: Houghton Grange Phase 2 – Land Between Houghton Grange And The How Houghton Road Houghton ("the Site")

23/00627/OUT | Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works ("the Application")

1. We are instructed by Houghton & Wyton Parish Council ("**the Parish Council**") and write in **objection** to the Application for the reasons set out below.

2. These representations are accompanied by two reports commissioned by the Parish Council prepared by Peter Radmall Associates:

   (i) *Review of Applicant's Landscape and Visual Appraisal* ("**the LVA Review**"), which identifies failings in the Landscape and Visual Appraisal ("**LVA**") commissioned by the Applicant; and

   (ii) *Implications for Separation between Houghton and St Ives* ("**the Separation Report**"), which considers the Parish Council's concerns about the Development's implications for coalescence and further urbanisation.

3. In summary, the Application conflicts with both the development plan and national planning policy. Material considerations also weigh against the grant of permission. In particular:

   (i) The Development is contrary to a number of policies of the Huntingdonshire Local Plan to 2036 ("**the Local Plan**"), the Development:

      (a) Does not protect the character of Houghton & Wyton, contrary to *Policy LP 2 – Strategy for Development*;
      (b) Does not contribute to the landscape, wildlife, cultural and historical value of the area, contrary to *Policy LP 3 – Green Infrastructure*;
      (c) Does not recognise the intrinsic character and beauty of the countryside, contrary to *Policy LP 10 – The Countryside*;

(d) Does not respond positively to its context and does not apply the guidance in the Huntingdonshire Landscape and Townscape Assessment (2022) ("**the HLTA 2022**"), contrary to *Policy LP 11 – Design Context*; and
(e) Does not contribute positively to the area's character and identity or integrate with topography and landscape, contrary to *Policy LP 12 – Design Integration*
(f) Conflicts with the Site Allocation policy LP SI 1 (for St Ives Town) and applies the 10% tolerance found in text at D8 of the Local Plan in an arguably unlawful way by failing to adopt a masterplan at the outset and then proceeding to rely on the 10% tolerance in plan text at D8 for this Site rather than application of the tolerance across the whole SI 1 Allocation, leading to a demonstrable over-development of this Site, the remaining parcel of the SI 1 Allocation.

(ii) Contrary to the policies of the Houghton Neighbourhood Plan ("**the Neighbourhood Plan**"):

(a) the Development is outside of the Houghton & Wyton built up area and is within the open countryside and does not comply with the relevant policies for building in the countryside, contrary to *Policy HWNP1 – Houghton & Wyton built up area*.
(b) the Development does not respect the individual and distinct identities of the village of Houghton & Wyton and the town of St Ives because it individually and cumulatively results in the loss of visual and physical separation between those two settlements and would lead to their coalescence, contrary to *Policy HWNP3 – Anti-coalescence*.

(iii) The Applicant's LVA does not demonstrate that the Development complies with *Paragraph 174 of the NPPF* requiring that it contribute to and enhance the natural and local environment by protecting and enhancing valued landscaped or recognising the intrinsic character and beauty of the countryside.

The Site

4. The Site represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St. Ives and lies within the Great Ouse Valley Landscape Character Area.[1] It forms part of Local Plan allocation SI 1 St Ives West ("**the SI 1 Allocation**"),[2] which allows for mixed use and approximately 400 homes, 23 ha of green space and social and community facilities. The proposed Development is the last of four separate parcels to be developed on the SI 1 Allocation, the other three being: (1) Houghton Grange Phase 1 - 107 houses, (2) The Spires - 186 houses, (3) The How - 19 houses. The Site is nevertheless to be regarded as open countryside.[3]

Planning policy

NPPF 174

[1] defined on pg.77 of the Huntingdonshire Landscape and Townscape SPD (2022).
[2] Page 195, Huntingdonshire Local Plan
[3] Policy SI 1 provides (pg. 195) (underlining added): "Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications."

5. Paragraph 174 of the NPPF provides that (emphasis added):

> *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
>
> *(a) protecting and enhancing valued landscapes […]*
>
> *(b) recognising the intrinsic character and beauty of the countryside […]*

The Local Plan

6. The Local Plan was adopted in May 2019 and includes the Site as allocation SI 1, St Ives West, for the redevelopment of Houghton Grange for approximately 400 homes, 23ha of green space and social and community facilities to meet the needs arising from the development. The policy includes *inter alia* the requirement for *completion of a detailed master planning exercise to be agreed with the Council* and (g) *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires* (emphasis added)

7. In addition, there are numerous Local Plan policies relevant to the application, and these include:

> LP 2 Strategy for Development: provides that the development strategy for Huntingdonshire is to *"Protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside"*.
>
> LP 3 Green Infrastructure: states that proposals should support green infrastructure, incorporating open space and protecting and enhancing the existing network (with reference to the Cambridgeshire Strategic Green Infrastructure Network). LP 3 also states that a proposal within the Ouse Valley Landscape Character Area will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area.
>
> LP 11 Design Context: states that a proposal will be supported where it positively responds to its context and has drawn inspiration from key characteristics of the surroundings. Proposals need to apply the guidance in the Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Townscape Assessment SPD (2007) or successor documents[4] and applicable conservation area character statements.
>
> LP 12 Design Implementation: states that a proposal will be supported where it contributes positively to an area's character and identity, integrating with topography and landscape

The Neighbourhood Plan

8. The Neighbourhood Plan, adopted March 2018, provides:

> ***Policy HWNP3 – Anti-coalescence***

[4] The Huntingdonshire Landscape and Townscape Assessment SPD (2007) has been superseded by the Huntingdonshire Landscape and Townscape SPD (2022)

Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements, or would lead to their coalescence (emphasis added).

*Huntingdonshire Landscape and Townscape SPD 2022 ("**the HLT SPD**")*

9. The parish of Houghton and Wyton lies within the Great Ouse Valley landscape character area ("**GOV LCA**") identified in the HLT SPD, which notes that the landscape character of such parishes is derived from, and directly influenced by, the Great Ouse Valley. We note that the Applicant's LVA refers to the superseded Huntingdonshire Landscape and Townscape Assessment 2007 and therefore does not address a number of important requirements in the current SPD, importantly that (underlining added):

Development proposals should:

- *Enrich the area by reinforcing its special qualities and acknowledging its distinct local character.*
- *Use appropriate building materials to retain the distinctive local character of villages.*
- *Maintain or enhance water quality and quantity and not lead to any adverse impact on flood risk or flood defences.*
- *Protect and enhance the strategic green corridor formed by the river valley, particularly where it passes through settlements.*
- *Minimise the environmental impacts of recreational activities.*
- *Protect and enhance the ecological value of the river, its margins and the valley floor.*
- *Promote opportunities for wildlife and conservation initiatives to support and enhance the area's biodiversity.*
- *Protect the setting of historic structure such as bridges and mill buildings.*
- *Encourage public access along the Great Ouse Valley through.*

Representations

10. As undeveloped land, the Site is currently regarded as open countryside[5] and represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St Ives. The visual and coalescence impacts of the Development are therefore of particular concern and require careful attention as required by LP SI 1 (g) mentioned above.

11. Despite this, the Applicant's LVA does not adequately address a number of important issues relevant to policy and relies on the superseded Huntingdonshire Landscape and Townscape Assessment 2007.

12. The LVA Review highlights a number of serious flaws with the Applicant's LVA and its findings, including:

    (i) Failing to assess the character of the site by considering its landscape/ perceptual attributes as receptors;

[5] Policy SI 1 of the Local Plan; Policy HWNP1 of the Neighbourhood Plan.

(ii) Failing to assess the site's representativeness or and contribution to published character types/ areas
(iii) Failing to assess the site's landscape components and perceptual attributes at a local level, including with reference to the adjoining conservation areas.

13. As a result, the LVA has played down the severity of effects, particularly those on the most sensitive visual receptors and, that smaller-scale variations at a local level may have been overlooked.

14. Because the LVA fails to assess the Development's effects on site character, including its component landscape/perceptual attributes, and does not explicitly assess the site's representativeness of/contribution to the published LCAs[6] (especially the HLT SPD 2022, which requires that development proposals should Enrich the area by reinforcing its special qualities and acknowledging its distinct local character), it does not demonstrate that the Development does not conflict with the Local Plan policies identified above, or *Paragraph 174(b)* of the NPPF.

15. Additionally, as the LVA Review demonstrates, the failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the Site and failure to consider whether the Site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB, means that it is not demonstrated that the development complies with *Paragraph 174(a)* of the NPPF.

16. As explained in the Parish Council's Separation Report, the Development would encroach into open countryside and have a further urbanising influence on the locality, contrary to Neighbourhood Plan *Policy HWNP1 – Houghton & Wyton built up area,* Local Plan *Policy LP 10 – The Countryside*, SI 1 (g) and *Paragraph 174(b)* of the NPPF.

Anti-coalescence

17. The above failures related to the assessment of character also mean that there has not been adequate assessment taking account of the distinct identities of the village of Houghton & Wyton and the town of St Ives for the purposes of assessing compliance with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*. The Development presents very serious loss of openness of the remaining green gap between Houghton & Wyton and St Ives and would result in an increase in the actual and perceived coalescence between Houghton & Wyton and St Ives and urbanisation, such that the Development does not accord with the development principles illustrated in *Local Plan Policy SI 1* and conflicts with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*.

18. Indeed, it is apparent from the Applicant's Design and Access Statement ("**DAS**") that, notwithstanding the strong policy requirement to retain actual and perceived separation between Houghton & Wyton and St Ives, the Applicant has failed properly to consider the importance of avoiding coalescence between the settlements in designing its development. As the Parish Council's Separation Report makes clear, extending built development eastward in close proximity to the main road running along the northern edge of the Site exacerbates the actual and perceived loss of separation and tightens the pinch points between the settlements in the vicinity of the water tower, which is entirely contrary to the schematic principles proposed in the LP SI 1 Allocation. Indeed, it is notable that the Schematic Layout included with Policy SI 1 Allocation deliberately leaves a green buffer to the east of the water tower. The design evolution in sections 4.3-4.4 of the DAS

[6] LVA Review, section 5.

demonstrates that, contrary to the requirements of development plan policy, none of the design options tested involved any consideration of leaving open this most sensitive area of open countryside. The proposed development has thus, from inception, been contrary to adopted development plan policy. The Applicant has simply never considered, tested or otherwise assessed a proposal which would achieve the approach mandated by development plan policy.

Flawed application of 10% tolerance (LP text D8[7])

19. The harmful landscape impacts and loss of settlement separation is the direct consequence of the applicant's aggressive and potentially legally flawed interpretation and application of the 10% tolerance found in a text in Section D: Allocations at D8 which HE has relied on to increase the number of dwellings on this Site, and the failure early to adopt a Masterplan for the whole of the whole of the SI 1 Allocation. These concerns have been raised in correspondence with Homes England ("**HE**") multiple times and HE have failed repeatedly to engage with the Parish Council on a way forward for successful development of the Site. We most recently wrote to the HE on 12 June 2023 and received no substantive engagement in response. The principal points we make in relation to the 10% tolerance are set out in our letter of 12 June but for ease are recorded below.

20. The material planning harm arising from the application arises from two inter-related material failures early on in the commencement of the development of the S1 1 Allocation:

    (1) The first is HE's failure to agree with adjoining landowners and submit for approval a masterplan for the entire S1 1 Allocation before approvals in 2021-2022 for the Grange Phase 1 and the How (19/01180/REM and 19/02280/FUL respectively), as required by the policy. This was a critical requirement in the policy that was never achieved.

    (2) The second is that HE has adopted an arguably flawed legal interpretation of an application of the 10% tolerance found in text at D 8 in which results in overdevelopment of this Site, the last parcel that comprises the S1 1 Allocation.

21. Had a masterplan been in place as required by SI 1 (a) to guide development across the S1 1 Allocation, it would have been possible to decide at the outset whether and how best to use the 10% tolerance across the SI 1 Allocation and in accordance with the indicative layout in policy S1 1. As matters stand, there was no agreement through the masterplan process on how to allocate the 10% tolerance, and now HE is seeking to take advantage of the entire 10% tolerance which applies for the whole allocation of 400 dwellings to this Site, being the last remaining (and arguably most sensitive) parcel of undeveloped land within the SI 1 Allocation.

22. In other words, the Applicant's approach is to seek to rely on the fact that it did not include the relevant pro rata of the 10% tolerance on any of the other three parcels which comprise the SI 1 Allocation as a justification for an excess of new dwellings well in excess of 10% on the last Site's capacity. This is a fundamentally flawed interpretation and application of policy resulting in material planning harm, namely breaches of anti-coalescence objectives in policies in the District Local Plan and the Houghton & Wyton Neighbourhood Plan (P1 and P3). If the current parameter plan is approved without the changes they seek to address their concerns, the Parish Council are prepared to test these policies and the

[7] D8 provides for flexibility in delivering allocations and proposes a 10% tolerance either side of the allocation figure.

erroneous construction of the ‘tolerance’ through the courts. For this purpose, and reluctantly, the Parish Council have already retained Counsel, Charles Streeten of Francis Taylor Building, in anticipation of any litigation.

23. Since litigation is costly for all parties, and would introduce delay to the consent process, the Parish Council sought a meeting with HE representatives to discuss these concerns, with an expectation that scheme changes could result in a revised parameter plan layout they can support.

24. In summary, the Parish Council can support a scheme with modest changes to the north of Site, which at present presents a hard and overdeveloped edge. They wish to see the Site frontage pulled back from Houghton Road to introduce a softer landscaped edge to the access into the Development, as shown in the indicative plan to the SI 1 Allocation. This will help to define a clear division between Houghton & Wyton from the town of St Ives. This separation would also improve the amenity for these edge-facing houses otherwise adversely impacted by the traffic on Houghton Road.

25. The second change the Parish Council requests is to the footprint of the development to reduce the spread of the eastern edge so as to reduce the overall developed area to less than that in Phase 1. The eastern edge unnecessarily encroaches into the landscape buffer which separates the parish from St. Ives, and which creates an inappropriate hard suburban edge to the landscape buffer.

26. These changes to the parameter plan are economically viable in light of FOI correspondence with HE, which confirms that there is no commercial necessity for excess housing on this Site, the last parcel of the S1 1 Allocation in the Local Plan 2019. FOI references RFI3582 and RFI13408 reveal that the total HE site was valued at £7.2m, with Houghton Grange Phase 1/Morris Homes sold for 4.6m, hence leaving a residual value for the Site of £2.6m.

Transport Impacts

27. We note Cambridgeshire County Council’s comments on the proposal dated 25.5.23 which state that the application does not include sufficient information to properly determine the highway impact of the proposed development and therefore request the application is not determined until such time as the additional information has been submitted and published for public comment.

28. However, recent traffic studies - notably in connection with Eagle Mill (HDC ref 22/00371/FUL); Houghton & Wyton’s successful 2022/23 LHI application and justification for speed reduction along the A1123; together with HDC’s Option Assessment Report for the St. Ives Transport Study, all point to capacity issues on this road and therefore provide further evidence and support for a reduction in the overall number of dwellings on the Site.

Flooding

29. We also note the comments from CCC, the lead flooding authority, Cambridgeshire Water and Anglia Water, which refer to capacity issues within the system and potential for flooding downstream if certain conditions are not met.

30. Given the seriousness of the situation, these issues need to be addressed in full before an outline planning decision is made regarding given the excess of development proposed for the Site.

Conclusion

31. For the reasons detailed in the LVA Review, there are deficiencies in the Applicant's LVA such that its conclusions cannot be relied upon and the Development conflicts with policy on landscape.

32. Furthermore, as confirmed by the findings in the Parish Council's Separation Report, the Development has implications for coalescence, urbanisation and impacts on openness such that it conflicts with the policies identified above.

33. For the reasons set out above, **the Application should be Refused.**

Yours faithfully



Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT



IMPLICATIONS FOR SEPARATION BETWEEN HOUGHTON AND ST. IVES

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

June 2023

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1. Introduction

1.1 Peter Radmall Associates have been commissioned by Houghton and Wyton Parish Council to review the implications of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT) for maintaining separation between Houghton village and the built-up area of St. Ives.

1.2 The description of development is as follows:

Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

1.3 A landscape and visual appraisal (LVA, AECOM, March 2023) has been submitted in support of the application. A review of the LVA has been presented as a separate document.

1.4 This note is organised as follows:

- Section 2 summarizes the relevant policy context;
- Section 3 describes the current relationship between Houghton and St. Ives and the contribution made by the site;
- Section 4 assesses the impact of the proposed development on spatial and visual separation; and
- Section 5 provides a summary and conclusion, including the implications for relevant policy.

1.5 This exercise has been based on a site visit, discussions with Parish Council members and review of relevant documentation, notably the Neighbourhood Plan, the LVA, the NPPF and the applicant's Planning Statement.

2. Policy Context

Neighbourhood Plan

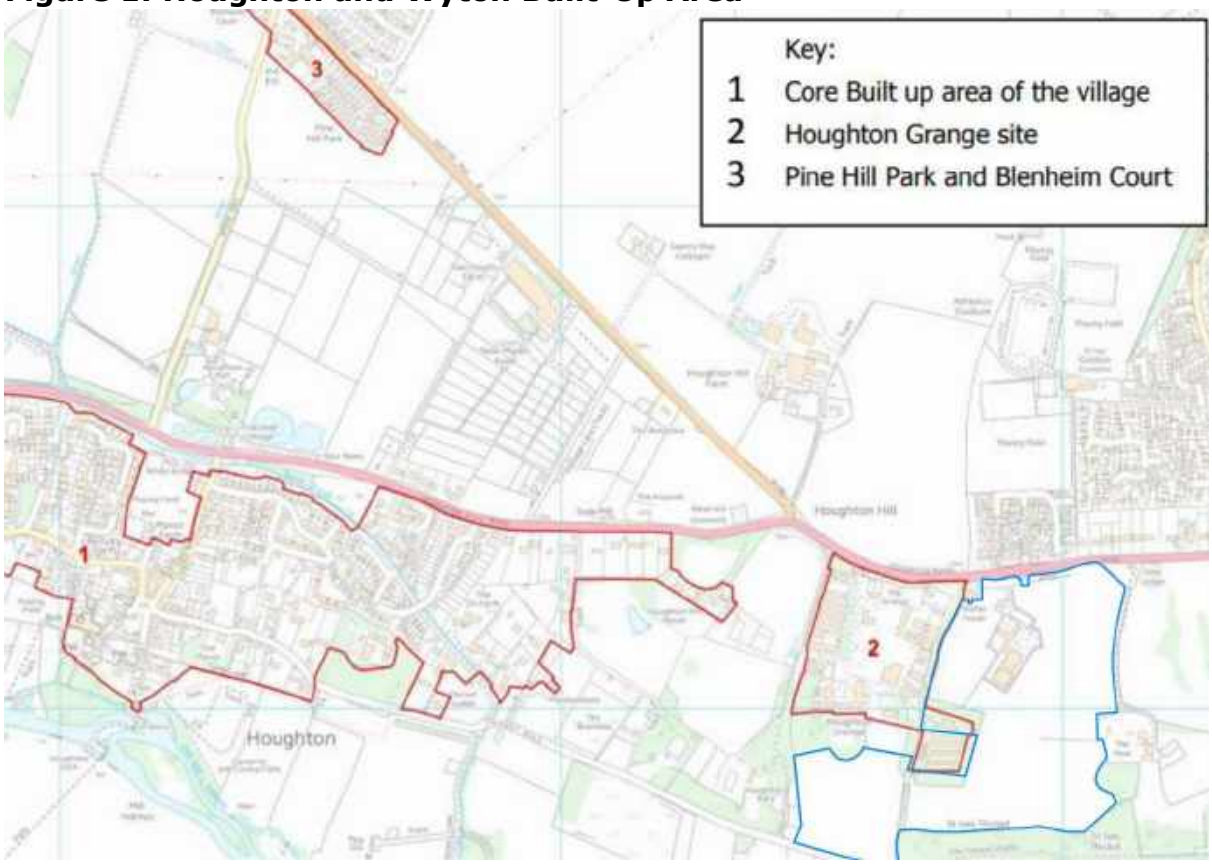
2.1 Objective 3 of the NP is "*To retain the separate identity of Houghton and Wyton as a small rural village and avoid any further merging with neighbouring towns and villages.*"

2.2 This objective is directly reflected in two NP policies:

- HWNP1: Houghton and Wyton built up area; and
- HWNP3: Anti-coalescence.

2.3 Policy HWNP1 defines the built-up area boundary for the village and confirms that areas outside this boundary form part of the open countryside. Proposals within this area are considered to "*be acceptable where they comply with relevant policies for building in the countryside*." The site's relationship to the built-up area boundary (shown as a red line) is shown in **Figure 1** (extracted from NP Figure 3, with the site boundary added as a blue line).

Figure 1: Houghton and Wyton Built-Up Area



2.4 As can be seen, the site lies immediately to the east and south of the Houghton Grange part of the built-up area. This forms an outlier of recent development within the greater part of the former poultry research station that occupied the

site from 1948-1992. This development, known as Houghton Grange Phase 1, is partly (c20%) complete and is accessed through the application site from the signalised junction on Houghton Road opposite Garner Drive. In the context of NP policy, the site is therefore located within open countryside.

2.5 Policy HWNP3 states the following: "*Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements, or would lead to their coalescence."*

2.6 The following main themes emerge from this:

i. The policy explicitly applies to separation between the village and St. Ives;

ii. Separation implies the maintenance of sufficient undeveloped (and ideally greenfield) land between the settlements to be perceived as an open gap. Openness can be interpreted both spatially (i.e. in terms of the absence of built development) and/or visually (i.e. so as to maintain a degree of visibility across the gap).

iii. The policy test refers to loss of separation, which can reasonably be interpreted to mean a "material reduction" as well as its elimination, as would result from coalescence (i.e. merging); and

iv. This can apply both to an individual development and to its cumulative effect, taking account of existing and/or other consented developments.

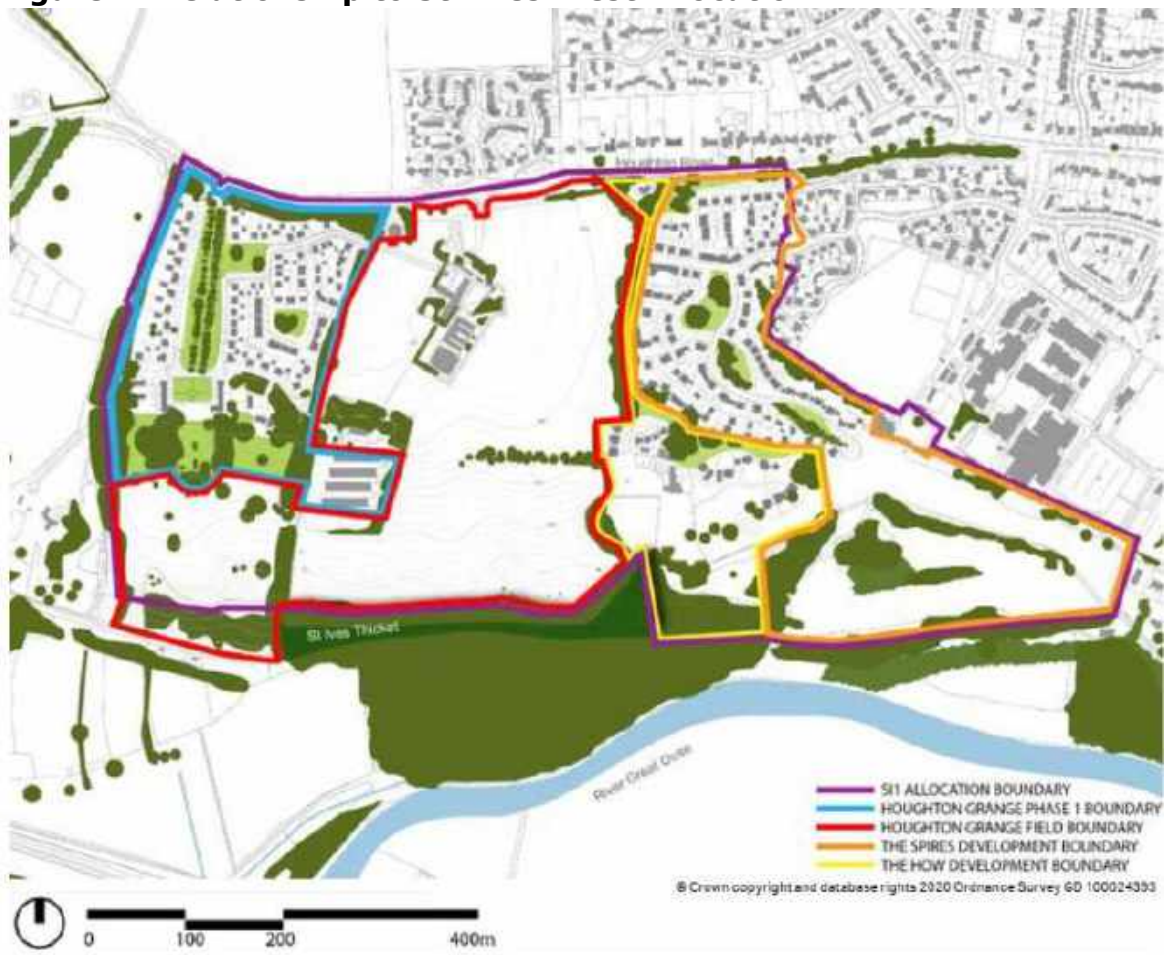
2.7 The last point above is specifically relevant in view of the allocated status of the application site, and recent extension of the settlement edge of St. Ives up to the parish boundary (see below).

<u>Local Plan Allocation</u>

2.8 The application site, together with Houghton Grange Phase 1 (to the west) and a triangular area to the east (most of which was formerly the St. Ives Golf Course), fall within Strategic Allocation S11: St. Ives West, as identified in the Local Plan (May 2019). The site's relationship to this area is shown on **Figure 2**.

2.9 The northern parcel of land to the east has now been built out (The Spires), whilst development of the land to the south of this (The How) is underway. With completion of these developments, the application site (known as the BBSRC field) represents the last remaining parcel of open land separating the settlement edges of Houghton/Wyton and St. Ives.

Figure 2: Relationship to St. Ives West Allocation



2.10 This is acknowledged in Policy S11, which states that: *"Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications."* Until that time, however, the site is to continue to be regarded as open countryside.

2.11 The need to retain a degree of separation is also acknowledged in the policy, which states that "*Successful development of the site will require… a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires*."

2.12 Para 11.9 of the explanatory text states that: "*Housing development should be predominantly situated in the northern part of the site and arranged in a series of clusters separated by green corridors running north-south through the site both to screen and separate areas of development and to connect through to the greenspace in the south of the site. A substantial band of greenspace should be retained through the portion of the BBSRC field to the east of the derelict buildings and up to the western edge of residential development at 'The Spires'. Management plans should be prepared for the greenspaces within the site which should encourage ecological diversity"*.

Other Policy

2.13 As noted above, the status of the site remains that of open countryside (until such time as it has been developed). This means that the following policies and guidance also remain engaged:

i. Local Plan 10: The Countryside;

ii. Local Plan 31: Trees, Woodland, Hedges and Hedgerows;

iii. Huntingdonshire's Landscape and Townscape Assessment SPD (2007); and

iv. NPPF 174 re the need for "*planning…decisions [to] contribute to and enhance the natural and local environment [my emphasis] by…(b) recognising the intrinsic character and beauty of the countryside…"*

2.14 It should be noted that it is arguable whether NPPF 174(a) re valued landscape may also be engaged. Whilst the value of the site and its setting has not been assessed in the LVA with a view to confirming this, it is clear that parts of it are of value (e.g. within the conservation areas and their setting). In addition, the "host" character area in which the site is located (LCA 4: Ouse Valley) is, according to the Neighbourhood Plan, "*what makes this such a special place to live or visit*" [NP 3.4]. It is also noted that this part of the Great Ouse Valley is a candidate for designation as an AONB, and that the application site falls within the defined area (ref separate LVA review).

3. Role of the Site in Maintaining Separation

Physical Separation

3.1 The character of the site and its relationship to the surrounding areas is shown in **Figure 3**. This aerial photo (from Google Earth) is now somewhat outdated, in that the poultry sheds that formerly occupied the central/northern part of the site have been demolished, and the junction/access road serving Houghton Grange Phase 1 has been completed. In addition, development within Houghton Grange and The How is well advanced.

Figure 3: Overview of Site and Immediate Context



3.2 The main part of the site clearly remains as the last "gap" of open land to the south of Houghton Road, separating the settlement edge of St. Ives from that of Houghton (as represented by the eastern edge of Houghton Grange Phase 1). This separating function is reinforced by the open and/or greenfield condition of most of the site, and the buffers of established vegetation that form its western and eastern boundaries. These features also reinforce its role as part of the open countryside.

3.3 The relatively recent completion of the Garner Drive development, to the north of Houghton Road, has extended the settlement edge of St. Ives the equivalent distance along the site frontage. As a result, this separating function is essentially interrupted by a pinch-point at the water-tower, before it is resumed

by the arable land to the north of Houghton Grange. This has become a "gateway" location in terms of how the transition between Houghton and St. Ives is perceived on the ground (see below).

Visual Separation

3.4 The separating function of the site is best appreciated from the sequence of views experienced along Houghton Road. **Figures 4-10** below show the views travelling eastwards from Houghton, the key features of which are as follows:

- Fig 4: Just east of the Sawtrey Way junction, the vegetated frontage to Houghton Grange frames the view to the right, whilst open views are gained across arable land towards the settlement edge of St. Ives to the left.

- Fig 5: Approaching the historic entrance to Houghton Grange, the lodges interrupt the vegetated frontage to the right, whilst a sense of openness is retained beyond the hedgerow to the left.

- Fig 6: Approaching the water-tower, new dwellings are seen through the vegetated frontage of Houghton Grange to the right, whilst a view opens up to the left towards the settlement edge of St. Ives. The water-tower is behind the group of conifers in the middle ground.

- Fig 7: At the "pinch-point" approaching the St. Ives welcome sign, the settlement edge of St. Ives approaches the road corridor from the left, whilst the site frontage opens up beyond the trees to the right.

- Fig 8: At the Garner Drive/Houghton Road junction, the proximity of the settlement edge to the left, and the urbanizing influence of the junction, are evident. However, the site reintroduces a sense of openness to the right, providing views towards the vegetated frontage to The Spires.

- Fig 9: Despite the paraphernalia associated with the access road (temporary screen fencing, flagpoles etc), the site clearly retains a greenfield condition, providing views towards the vegetated frontage of The How.

- Fig 10: The road corridor begins to close in as it approaches the settlement edge, although the site retains a sense of openness to the right, with development in The Spires visible beyond.

3.5 **Figures 11-16** below show the views travelling westwards out of St. Ives, the key features of which are as follows:

- Fig 11: At the entrance to The How, whilst the road corridor is well vegetated, it is clearly embedded within the built-up area (note the driveways accessing it to the right).

Figure 4: Eastward View along Houghton Road (a)



Figure 5: Eastward View along Houghton Road (b)



Figure 6: Eastward View along Houghton Road (c)



Figure 7: Eastward View along Houghton Road (d)



Figure 8: Eastward View along Houghton Road (e)



Figure 9: View into Site from Garner Drive



Figure 10: Eastward View along Houghton Road (f)



- Fig 12: Beyond The How, the site begins to open up to the left, with the Houghton and Wyton welcome sign visible in the middle ground, whilst the road corridor also widens on the approach to Garner Drive.

- Fig 13: Approaching the junction, the openness of the site is very evident to the left (even though the roadside hedgerow screens its greenfield cover). Medium-distance views are gained towards the vegetated frontage of Houghton Grange, with the settlement edge of St. Ives visible to the right.

- Fig 14: View north-westwards, looking towards the "pinch-point" at the water-tower. The openness of the arable land beyond the settlement edge is apparent, with the vegetated character of Houghton Grange to the left.

- Fig 15: View from the pinch-point, with the water-tower visible to the left, the vegetated frontage of Houghton Grange beyond, and the openness maintained by the arable fields north of the road to the right.

- Fig 16: New dwellings within Houghton Grange are visible to the left, within an otherwise vegetated frontage, whilst the arable land maintains openness to the right.

Figure 11: Westward View along Houghton Road (a)



Figure 12: Westward View along Houghton Road (b)



Figure 13: Westward View along Houghton Road (c)



Figure 14: View from Site Access Road



Figure 15: Westward View along Houghton Road (d)



Figure 16: Westward View along Houghton Road (e)



Other Views

3.6 The openness of the site can also be appreciated from LVA VP5, which is taken from a PRoW on its southern boundary – ref **Figure 17** below (and **Figure 19** for the VP location). Three key points should be noted from this view:

- Apart from the poultry sheds seen on the skyline in the centre of the view, the character of the site is dominated by its grassland cover and its established tree belts, which give it a semi-parkland appearance.

- These sheds have since been demolished, and at the time of my own site visit (in May 2022) had been reduced to a mound of rubble (ref **Figure 18**); and

- Neither the settlement edge of St Ives nor buildings within the Houghton Grange Phase 1 site are visible in the LVA view.

3.7 The perception of the site from LVA VP5 reinforces both its role as part of the open countryside and its contribution to maintaining visual openness as a foil to both the vegetated character of Houghton Grange and the built-up character of St. Ives beyond the skyline.

Figure 17: LVA View from VP5



Figure 18: May 2022 View from Further North within Site



4. Impact of the Development

Spatial Openness

4.1 The proposed built development would occupy c22.5% of the site, concentrated in its north-western corner, on either side of the existing access road. The remainder of the site would be retained as green infrastructure for a range of uses, including informal recreation, biodiversity enhancement, structural landscaping, a SuDs pond and children's play.

4.2 Whilst the majority of the site would technically remain open, the concentration of development adjacent to Houghton Road would reduce the existing width of the east/west green gap between Houghton Grange and The Spires (i.e. the settlement edges of Houghton and St. Ives respectively) by an average of c66%.

4.3 As a result, the functional gap would be reduced to a corridor of green space c100-150m wide occupying the eastern third of the site, beyond the developed area. In addition, the location of the development would "plug" the pinch-point between Houghton and St. Ives close to the water-tower, such that any residual separation between the settlements would be confined to the width of the road corridor along a 150m long section of Houghton Road. Since this section of road is inherently urban in character (with traffic lights, street lights, signage etc), its separating function is unlikely to be meaningful.

Visual Openness

4.4 The ZTV presented in the LVA shows that the immediate visual influence of the built development would extend east/west along Houghton Road, north-westwards across the arable land to the north, and across the remainder of the site eastwards to the settlement edge of St. Ives and south/south-westwards as far as The Thicket (ref **Figure 19**). As shown in the visual analysis in Section 3, these open areas currently contribute to the perception of separation between Houghton and St. Ives.

4.5 The Year 1 visualizations for Views 6 and 5, extracted from the LVA, confirm the loss of openness that would result (ref Figures 20 and 21). In View 6, built development would entirely obstruct the sense of openness that is currently gained from looking along the access road. In View 5, the development would infill the gap in the vegetated skyline that remains following demolition of the poultry sheds, introducing buildings into a view where none currently occur.

4.6 In addition, the proposed tree planting within the undeveloped parts of the site would over time further reduce visual openness (as well as screening views of

the development). This will particularly apply to views from Houghton Road, as planting along the road frontage becomes established.

Figure 19: Extract from ZTV with Viewpoint Locations



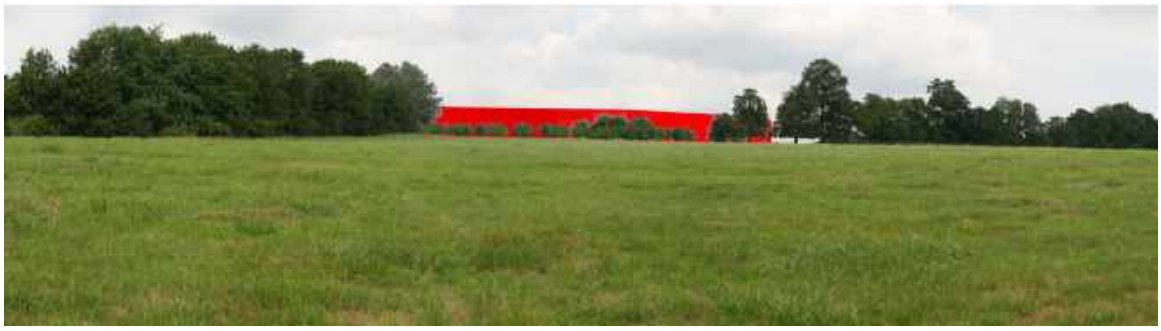
Intrusion into Countryside

4.7 As noted previously, the majority of the site qualifies as open countryside and its appearance contributes to that role (even though its recent use and management may not have been positive). In physical terms, the development would result in the urbanization of less than a quarter of the site, which is envisaged would be perceived as an extension to Houghton.

Figure 20: Year 1 Visualization for VP6



Figure 21: Year 1 Visualization for VP5



4.8 The proposed treatment of the remainder would include a range of initiatives that could enhance some of its attributes as countryside, notably its biodiversity, appearance and accessibility. At the same time, however, the urbanizing influence of the development would extend across much of the site, through its visual impact (ref **Figure 19**), its implications for tranquillity, and the introduction of recreational uses that are typical of urban fringe locations. The degree to which these parts of the site would continue to be perceived as open countryside may therefore be arguable.

Comparison with Notional Allocated Scheme

4.9 Whilst Policy S11 does not specify the precise footprint of development, the explanatory text includes an illustration of how the allocation is envisaged to be laid out in general terms. This is shown in **Figure 22** below (which has been annotated to provide more information).

4.10 Comparison with the submitted Parameter Plan (ref **Figure 23**) shows that built development was originally envisaged:

- not to extend east of the access road junction, so as to occupy a smaller proportion (up to c55%) of the distance between the edges of Houghton Grange and The Spires/The How;

- to be pulled southwards from Houghton Road, broadly corresponding to the alignment of the access road, rather than infilling between the access road and the main road; and

- to occupy a footprint demonstrably smaller than that of Houghton Grange.

Figure 22: Schematic Layout from Policy S11

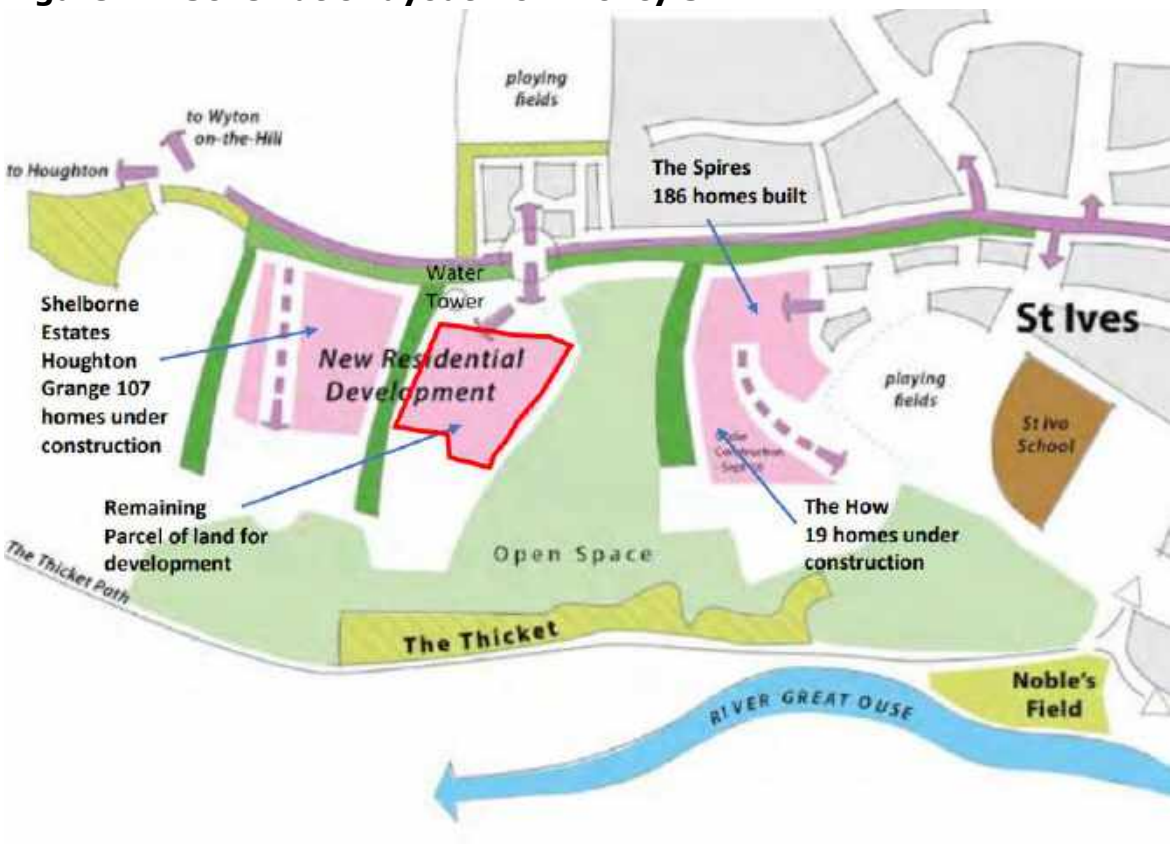


Figure 23: Parameter Plan



4.11 By extending built development further to the east, and closer to the main road, the current proposal exacerbates the actual and perceived loss of separation and tightens the pinch-point between the settlements in the vicinity of the water tower. This is evidently contrary to the schematic principles proposed in the policy.

5. Summary and Conclusion

5.1 The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road. The majority of the site retains a greenfield character that reinforces its role as part of the open countryside. Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).

5.2 The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road. This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.

5.3 The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires. It is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.

5.4 Development would occupy only c22.5% of the site. However, it would be concentrated on its north-western corner, adjacent to Houghton Road. As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.

5.5 The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west. The visualizations in the LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.

5.6 The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins. This is clearly contrary to NP Policy 3.

5.7 It is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.

5.8 The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b).

5.9 The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.

23rd June, 2023

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Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT



REVIEW OF APPLICANT'S LANDSCAPE AND VISUAL APPRAISAL(LVA)

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

June 2023

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4. Year 1/Year 15 Visualizations for VP5

1. Introduction

1.1 I have been commissioned by Houghton and Wyton Parish Council to carry out a review of the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT). The description of development is as follows:

Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

1.2 A landscape and visual appraisal (LVA, AECOM, March 2023) has been submitted in support of the application. This document comprises a review of the LVA in terms of its compliance with best practice and comments on whether its findings appear to be robust, complete and reasonable.

1.3 The exercise has been informed by the relevant technical guidance[1], which advises that such reviews should consider:

- the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
- the baseline, content and findings of the assessment; and
- the presentation of the assessment findings.

1.4 The review has been based on:

- the submitted LVA material and other relevant application documents/drawings;
- published guidance and policy documents (notably GLVIA3[2]); and
- a visit to the site and surrounding area;

Limitations

1.5 The following limitations should be noted:

- This review does not purport to be an LVA/LVIA in its own right, and therefore does not attempt to identify and categorise all the potential effects;

[1] Reviewing LVIAs and LVAs, LI TGN 01/20 (January 2020)
[2] Guidelines for Landscape and Visual Impact Assessment, LI/IEMA, 2013

- It has not at this stage included a detailed technical audit of the photographic and visualization material;
- Consequently, it places a degree of reliance on the submitted material;
- The fieldwork undertaken for this review was confined to publicly-accessible locations, and only selected viewpoints were visited;
- The review has not considered the status of, or the weight to be given to, relevant policy; and
- Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

2. Compliance with Best Practice

2.1 The LVA has been reviewed in terms of its compliance with the main requirements of the process as set out in GLVIA3 and prevailing practice; this is presented in **Table 1** below. Responses that raise queries or potential concerns are shown in bold and are addressed in Section 3.

Table 1: LVIA Compliance Checklist

Criterion	Response	Comment
1. Overall Approach		
1.1 Does the assessment distinguish between landscape and visual effects?	Yes	
1.2 Are the methodology and terminology clearly explained?	Yes	LVIA Appendix A
1.4 Does the assessment state whether the effects are beneficial, adverse or neutral?	Yes	
1.5 Does the assessment distinguish between the effects of construction and the completed development?	Yes	
1.6 Where a potential for adverse effects has been identified, has mitigation been proposed?	Yes	Embedded/primary mitigation is described in LVA Section 6 and is shown on LVA Appendix B, Figure 6: Parameter Plan
1.7 Has the effectiveness of this mitigation been assessed (e.g. by reporting effects at Years 1 and 15)?	Yes	
2. Presentation		
2.1 Is the LVA clearly structured and presented?	Yes	
2.2 Is it adequately supported by:		
- Maps/plans?	Yes	LVA Appendix B
- ZTV?	Yes	
- Photos?	Yes	
- Visualizations?	Yes	
3. Landscape Character		
3.1 Has reference been made to published LCAs at the appropriate levels?	Yes	At national (NCA 88) (LCA 4.2.3.1) and district (Huntingdonshire LCA/TCA, LVA 4.2.3.2) levels.
3.2 Has the character of the site been adequately described and assessed?	**Partly**	Whilst the site is described (LVA 4.2.2), neither it nor its landscape/perceptual attributes (e.g land cover, landform, significant

		vegetation, openness) have been treated as receptors for assessment purposes.
3.3 Has the site's representativeness of/contribution to the published character types/areas been assessed?	**No**	There is no explicit consideration of this in LVA Section 7, since the site is not identified as a receptor.
3.4 Have relevant designations been identified?	Yes	There are no landscape designations within the study area. However, the Houghton & Wyton and St Ives Conservation Areas adjoin the site, and the settings of such areas are a material consideration.
3.5 Have the relevant landscape receptors been assessed?	**No**	Landscape receptors are confined to the district-level LCAs – ref LVA Section 7. Neither the site, its landscape components and perceptual attributes, the adjoining conservation areas or their component sub-areas are identified as receptors.
3.6 Has landscape sensitivity been assessed on the basis of its susceptibility and value?	Yes	LVA Section 7.
3.7 Has the LVA considered whether the site may form part of a valued landscape?	**No**	The value of the site and its immediate setting (which includes parts of the conservation areas) has not been explicitly considered.
4. Visual Impact		
4.1 Has a ZTV/ZVI been produced?	Yes	Ref LVA Figures 4 + 5
4.2 Were the assessment views agreed with the LPA?	**Assumed Not**	Since there is no reference to such agreement in the LVA.
4.3 Are these views sufficiently representative?	**Partly**	See below – Whilst 20 views suggest a reasonable degree of coverage overall, a query have been raised about viewpoint selection.
4.4 Have seasonal influences been taken into account?	**Partly**	Although the photos were taken in July, the Y1 assessment is based on a winter (i.e worst-case) scenario - but the Y15 assessment is based on a

		summer (i.e. best-case) scenario.
4.5 Can the photography and visualizations be relied upon?	**Assumed So**	In the absence of a detailed technical audit.
4.6 Have all potential receptors been identified?	**Partly**	Ref LVA Section 5.2 – subject to query relating to viewpoint selection
4.7 Has their sensitivity been properly assessed?	**Partly**	Ref LVA Section 7 – queries have been raised about the sensitivity of some residents and users of PRoWs.
5. Policy Considerations		
5.1 Does the LVA set out the landscape policy context?	Yes	LVA Section 2
5.2 Does the LVA comment on the degree to which the proposed development complies/conflicts with relevant policy?	No	But this is not unusual, and is typically addressed in the applicant's Planning Statement.

3. Key Points Arising

3.1 Whilst the LVA has been carried out in accordance with the principles of the guidance, the following queries and potential deficiencies should be noted:

i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;

ii. The site's representativeness of/contribution to the published LCAs has not been assessed;

iii. The conservation areas adjoining the site (and their component sub-areas) have also not been identified as landscape receptors;

iv. There has been no explicit consideration of whether the site may form part of a valued landscape;

v. The assessment views do not appear to have been agreed with the LPA;

vi. The location/representativeness of some of the viewpoints – the Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered;

vii. Seasonal influences on visibility and effects are not evident from the photography/visualizations;

viii. The reliability of the visual material has been taken as read; and

ix. The sensitivity of some visual receptors.

<u>Effects on the Site and its Component Attributes</u>

3.2 The assessment of landscape character effects is essentially an aggregating exercise, whereby changes to individual landscape components and perceptual attributes may to varying degrees "cascade upwards" through each specific site, locality, neighbourhood, study area and hierarchy of published character areas (district to national).

3.3 This is reflected in the guidance, which states that "*The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected…, often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects*." [GLVIA3, 5.34 bullet 1].

3.4 Since the LVA does not follow this approach, and identifies only the district-wide LCAs as receptors, it is difficult to understand how it has arrived at its assessment of effects on them. This is particularly the case because there is

no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs.

Effects on the Conservation Areas

3.5 The relationship of the site to the two conservation areas is shown in **Figure 1** below (extracted from the DAS). Whilst conservation areas are primarily heritage designations, they often have landscape (as well as townscape) implications, particularly where they may include greenfield land and/or possess a wider setting. That is the case here.

3.6 The ZTV mapping (LVA Figures 4/5) indicates that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The LVA fails to assess whether there would be any effects on the character or setting of either CA.

Figure 1: Relationship to Designations



Valued Landscape

3.7 The LVA does not consider whether the site may form part of a valued landscape, and thereby worthy of consideration under NPPF174(a), by following

either Box5.1[3] or Table 1 in TGN02/21[4]. It is not the purpose of this review to carry out such an assessment or to put forward a case for the site to be regarded as such.

3.8 However, whilst most of the site is not officially accessible to the public, and its northern part is of unremarkable character, its sloping southern part is more distinctive. In addition, its south-western part falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton CA, whilst its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.

3.9 In addition, the site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB). AONBs define landscapes that are of national importance for the protection and enhancement of their natural beauty, designated under the National Parks and Access to the Countryside Act, 1949.

3.10 The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.

3.11 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site is considered to contribute to that value. This has not been acknowledged in the LVA.

Visual Assessment

3.12 It is good practice to agree the assessment views with the LPA. Since the LVA makes no reference to such an agreement, it is assumed that this was not the case here.

3.13 The assessment has been based on 20 representative viewpoints, as shown on **Figure 2** below. These are presented as "Type 1" visualizations (i.e. existing views annotated to show the site extent, blue dots), of which six were then used for the preparation of "Type 4" visualizations (i.e. existing views with the development envelope added, pink dots).

3.14 At first sight, this appears to represent a reasonable number and distribution of views. However, in view of the parish council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful.

[3] GLVIA3 p84

[4] Assessing landscape value outside national designations, Landscape Institute, February 2021

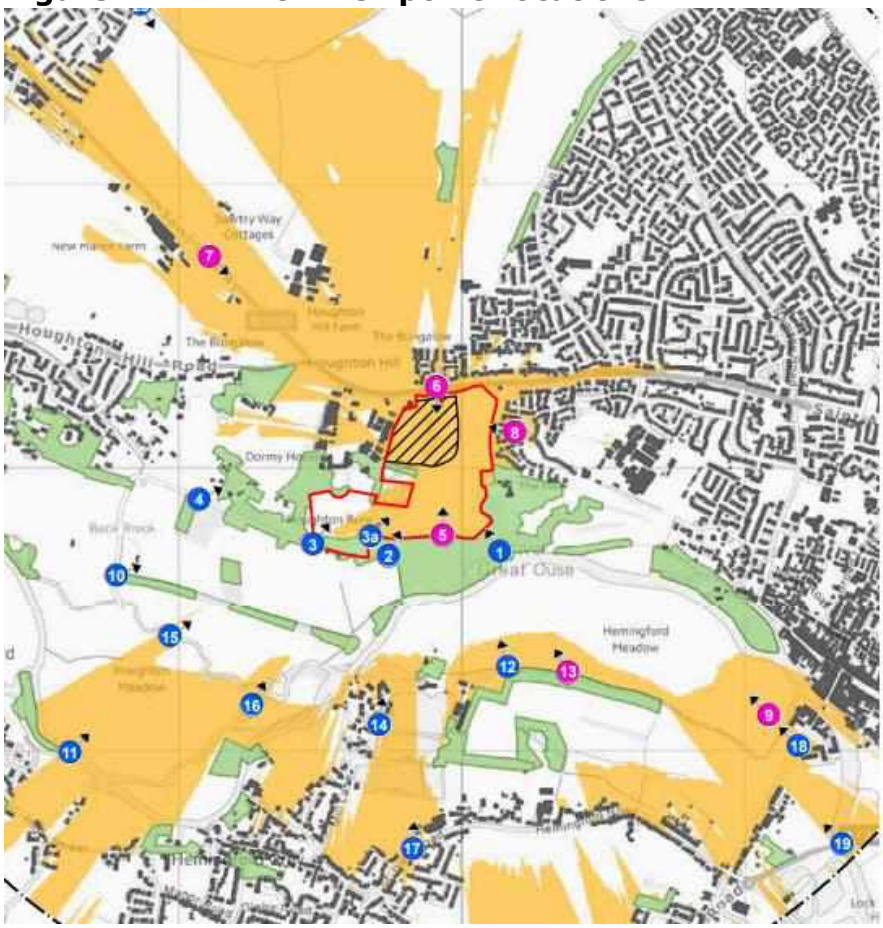
3.15 Whilst no detailed technical audit of the ZTV, photography or visualizations has been undertaken at this stage, a preliminary review of this material (by MS Environmental) has raised the following points:

- The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4km in height, but their ZTVs typically extend to 5km).
- The ZTV with visual buffers is poor, as it identifies viewpoints with no visibility.
- Whilst there are 20 identified viewpoints, all but three have no view of the site and should probably have been replaced; these include four of the six "Type 4" visualizations.
- Winter and summer photography should have been provided for each viewpoint.
- Viewpoint 6 ("Type 3") fails to capture the full extent of the site and is a poor example; in addition, it is not clear why this is specified as Type 3 rather than Type 4.
- There should be additional closer-range viewpoints along Houghton Road and the Ouse Valley Way.
- The reference to a 10-15m tolerance on the Parameter Plan is ambiguous, although it is assumed to apply to layout.

3.16 Whilst the LVA allows for variations in effects between summer and winter conditions, these are not evident in the photography and visualizations, which only show the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability, and in the judgments based on it, and in view of the March submission date for the LVA could conceivably have been provided.

3.17 Finally, the discrepancies in sensitivity between the same categories of visual receptor are not readily explicable. Of the six receptor groups comprising users of PRoWs or public access land, three are of medium sensitivity and three are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that "*visual receptors most susceptible to change are…likely to include…residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way*…".

Figure 2: ZTV with Viewpoint Locations



4. Critique of LVA Findings

Sources of Impact

4.1 Since the development is fully described in the Design and Access Statement and elsewhere, a summary of the main sources of landscape/visual impact will suffice as follows (for reference purposes, the Parameter Plan is presented in **Figure 3**):

- The current use of most of the site (as former pasture) would be displaced.

- The Arboricultural Impact Assessment reports the following regarding tree loss:

  - Thirteen individual trees, eight full groups and part of eight groups are to be removed to facilitate the Proposed Development; this includes part of four groups classed as high quality (Category A), three individual trees and part of two groups classed as moderate quality (Category B) and the remaining ten individual trees, eight full groups and part of two groups classified as low quality (Category C).

  - In addition, nine individual trees, three full groups and part of one group which are identified as unsuitable for retention (Category U) in the context of the current land use are also required for removal to facilitate the Proposed Development. These trees are arguably not suitable for long term retention and their removal is justified regardless of the Proposed Development.

  - Further tree removals may be required to facilitate the installation of pedestrian footways within the RPAs of G269, G270, G315 and G319 (of high quality) and G196 and G333 (of moderate quality)

- The part of the site to be developed is gently sloping and would to a degree need to be reprofiled to accommodate the building footprints and access/parking areas.

- Vehicular access would be provided off the constructed Houghton Grange Phase 1 access road.

- The buildings would be a maximum height of two storeys (10m to ridge).

- The development area would occupy c22.5% of the site, concentrated in its north-western corner.

- The remainder of the site would comprise green infrastructure, including a mix of informal amenity space, children's play, habitat creation, a SuDs pond, retained tree cover and new structural planting, with new pedestrian/cycle links to the surrounding area.

- Once completed and occupied, the development would introduce lighting onto what is currently an unlit site (although the nearby sections of Houghton Road and adjoining built-up areas are lit).

Figure 3: Parameter Plan



Construction Effects

4.2 The LVA predicts the landscape character effects to be no greater than minor adverse (for LCA4: Ouse Valley) and the visual effects to be no greater than moderate adverse (for users of the informal path on the southern part of the site, travellers on Houghton Road and residents of Garner Drive) [ref LVA 8.1.1.3].

4.3 These conclusions appear to be consistent with the judgmental framework used in the LVA. In relation to the landscape effects on LCA4, LVA Table 3-9 (in LVA Appendix A) indicates that a low magnitude of change to a highly sensitive receptor can give rise to a moderate/minor effect, and it is assumed that the conclusion of minor in this case reflects the limited duration of the works.

Year 1 Landscape Effects

4.4 The LVA predicts that the landscape character effects would be no greater than minor adverse, in relation to LCA3, resulting from a low magnitude of change to a receptor of high sensitivity [LVA 8.1.2.3]. This reflects the relatively low sensitivity part of the site where built development would be located, together with its insignificant proportion of/peripheral location within the LCA, and its separation from the remainder of the LCA by St Ives Thicket.

4.5 Whilst this logic appears to be reasonable, an explicit evaluation of the role of the site within the LCA would have been helpful. In addition, the district-wide LVAs are relatively large-scale units, and LCA4 includes locally significant variations in character such as the St Ives urban fringe, the Houghton Grange estate/recent residential development, the valley slopes, River Ouse floodplain and valley crest (where the built development would be located).

4.6 A finer-grained assessment may well have teased out more meaningful variations in effect. Such an approach should arguably have considered the potential for effects on the character and/or setting of the two conservation areas (rather than leaving this entirely as a matter for the Cultural Heritage DBA), and also the relevant character areas identified in Appendix 1 of the Neighbourhood Plan.

4.7 In relation to the St. Ives CA, the DBA reports that "*…it is possible that buildings on the southern edge of the developed area will be visible from the boundary of the conservation area on the north edge of St Ives Thicket*" [DBA 6.2], and that "*The setting of the conservation area to the north of St Ives Thicket will be changed by the Proposed Development which will introduce built development to part of the setting that was formerly agricultural*" [DBA 6.4].

4.8 In relation to the Houghton and Wyton CA, the DBA reports that "*The Proposed Development has the potential for impact on two character areas of the Houghton and Wyton Conservation Area, Houghton Hill and Thicket Road East and The Meadows"* [DBA 6.5], and that "*Impact on the conservation area as a result of the Proposed Development will…be confined to the boundary with Phase 1 of the Houghton Grange development*" [DBA 6.6].

Year 1 Visual Effects

4.9 The LVA predicts that the visual effects at Y1 would be moderate adverse for two of the 14 receptor categories, minor adverse for one, negligible for one,

and neutral for the remaining 10. Table 3-9 in LVA Appendix A makes it clear that neutral essentially means "no effect", since it results from no change.

4.10 This very limited range of effects, together with the absence of any effects of major magnitude - even though this relates to the worst-case scenario (winter, before landscaping has begun to take effect) - invites scrutiny. The greatest effects relate to views 5 and 6.

4.11 For VP5, the LVA predicts that medium sensitivity x medium change would give rise to a moderate adverse effect. However, as noted previously, footpath users could legitimately be considered to be of high sensitivity where their setting contributes to their amenity. If that were to be applied here, the effect could be categorised as major or moderate.

4.12 For VP6, the LVA predicts that medium sensitivity x a high degree of change would give rise to a moderate adverse effect. However, Table 3-9 in LVA Appendix A indicates that such a combination can give rise to a major or moderate effect. The "Type 4" visualization for VP6 indicates that the development would amount to a fundamental change to what is currently an open view (beyond Houghton Road), it is not clear why a major effect has not been reported in this case.

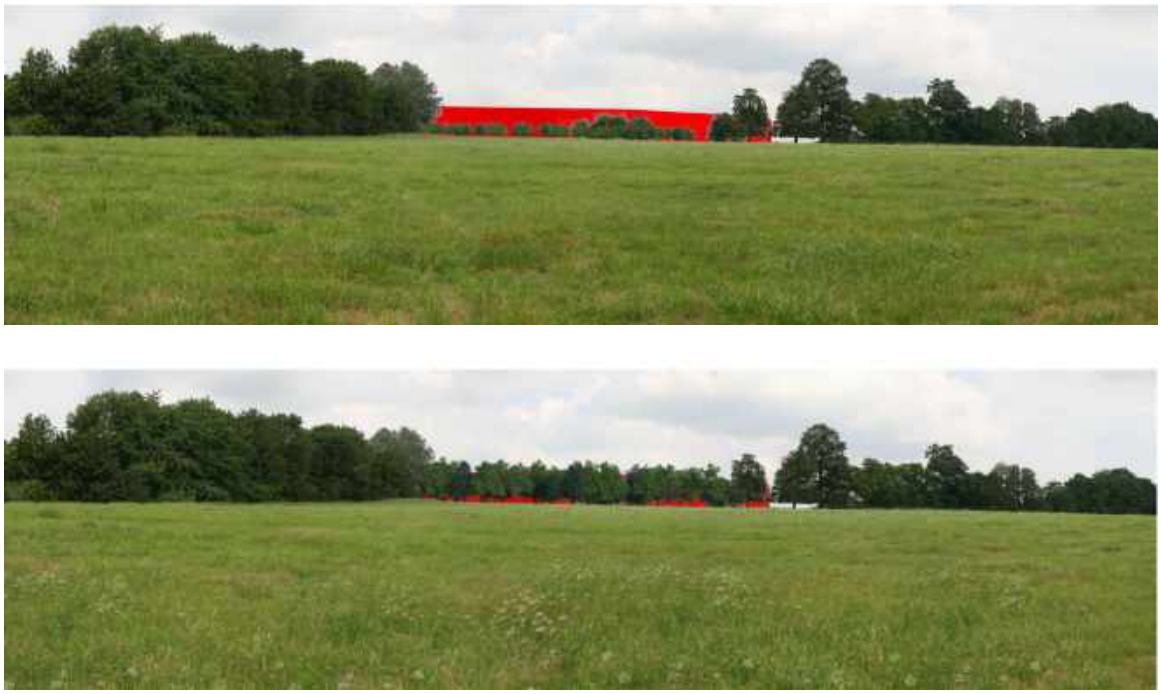
4.13 The visualizations for the remaining VPs indicate that vegetation would obstruct views of the development, notably from VPs 5 and 8. This rapid falling away of visibility with distance from the site is not entirely uncommon. However, due to the absence of winter views from such locations, we have no option but to take the conclusions of the LVA at face value.

Year 15 Effects

4.14 By Y15, the LVA predicts that the effect on LCA4 would be reduced to negligible, and that the effects on the receptor groups represented by VPs 5 and 6 would be reduced to minor adverse, with all other visual effects becoming either negligible or neutral [LVA 8.1.3.3]. This reduction in effects, typically by an order of magnitude, is a common outcome in LVA, and reflects the assumed effectiveness of the proposed landscaping in integrating the development into its landscape context and screening specific views.

4.15 Scrutiny of the Y15 visualizations for VPs 5 and 6, however, suggests that this assumption should not necessarily be taken at face value. In relation to VP5, the Y1 visualization clearly shows what could legitimately be regarded as a major effect, with the development closing the skyline gap between the tree-belt within the site (to the right) and the trees within the Houghton Grange site (to the left). The Y15 visualization shows this gap to remain closed, with the development likely to remain visible beyond the proposed tree planting (and probably even more so in winter). This comparison is shown in **Figure 4** below.

Figure 4: Year 1 and Year 15 Visualizations for VP5



4.16 In relation to VP6, the Y1 visualizations shows the open view beyond Houghton Road completely obstructed by the proposed development. This obstructing and urbanizing effect would remain at Y15, with relatively little mitigation provided by the proposed landscaping around the site entrance/Houghton Road frontage. This comparison is shown in **Figure 5** below.

Figure 5: Year 1 and Year 15 Visualizations for VP6



5. Summary and Advice to the Parish Council

Robustness of LVA and its Findings

5.1 The LVA is considered to be consistent with the principles of GLVIA3. However, reservations have been identified in relation to the following:

i. Its failure to assess the effects on site character and its component landscape/perceptual attributes;

ii. The absence of explicit assessment of the site's representativeness of/contribution to the published LCAs;

iii. Its failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the site (although this is addressed in the Cultural Heritage DBA);

iv. Its failure to consider whether the site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB;

v. The absence of any finer-grained breakdown of the character effects below that of the district-level LCAs (including, for example, the character areas from the Neighbourhood Plan);

vi. The apparent absence of agreement of the assessment views with the LPA;

vii. The extent and basis for the ZTV, and the location/representativeness of some of the viewpoints, 85% of which indicate no view of the site;

viii. The absence of worst-case (winter) versions of the photography/visualizations;

ix. The need to take the reliability of the visual material as read at this stage;

x. Potential under-reporting of the sensitivity of some visual receptors and the magnitude of change to some views, which could influence the predicted effects; and

xi. Potential exaggeration of the effectiveness of the proposed mitigation.

Conclusion

5.2 Taking account of the above, the conclusions of the LVA should not necessarily be taken at face value, without considering the points raised in this review.

5.3 In particular, the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects, notably those on the most sensitive visual receptors within some of the closest-range views.

5.4 It is also noted that the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the LVA to overlook smaller-scale variations in effects that could be meaningful at a local level.

5.5 The Parish Council are advised to form their own judgments about the acceptability of the proposals in landscape and visual terms. These judgments should be informed by the factual information in the LVA and elsewhere, by the matters raised in this review, and by their own perception of the potential impacts and the effectiveness of the mitigation, within the policy framework provided by the Neighbourhood Plan.

23rd June, 2023

Peter Radmall Associates
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[redacted]

From: [redacted]
Sent: 22 October 2024 15:34
To: DevelopmentControl
Cc: [redacted]
Subject: Houghton Grange Phase 2 (23/00627/OUT)
Attachments: We sent you safe versions of your files; HDC (out) 22.10.24.pdf; HoughtonRevisedLVAreviewOctober24FinalForSubmission[2].pdf

Categories: S[redacted]

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Ms Fisher,

Please see attached letter sent on behalf of our client, Houghton & Wyton Parish Council objecting the above planning application as well as an associated updated review by Peter Radmall.

Kind Regards,

[redacted]

[redacted]
Paralegal
Richard Buxton Solicitors
Dale's Brewery, Gwydir Street, Cambridge CB1 2LJ
T. [redacted]
E. [redacted]
W. [redacted]

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Huntingdonshire District Council
Planning Development Control
Pathfinder House
St Mary's Street
Huntingdon PE29 3TN

Our ref: HOU1/2/LPF
Your ref: 23/00627/OUT

22 October 2024

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

RE: Houghton Grange Phase 2 – Land Between Houghton Grange And The How Houghton Road Houghton ("the Site")

23/00627/OUT | Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works ("the Application")

1. We are instructed by Houghton & Wyton Parish Council and write in response to the recent consultation on updated information including a revised parameters plan (Rev 6 dated 8/8/24) and revised LVA, a Planning Statement Addendum and a Design and Access Statement ("DAS") Addendum. According to updated information the Application continues to seek consent for up to 120 dwellings. This letter updates our objection letter sent in June 2023.

2. Our clients appreciate there has been some minor layout changes in response to points raised in their initial objection and by officers but for the reasons set out below, the Parish Council **continue to maintain an objection to the Application**.

3. The DAS addendum notes one material change in layout comprising a setback along Houghton Road to create a softer edge along Houghton Road, especially to the east of the access road. The original scheme set back built development from the road by approximately 15 metres. The revised proposals provide set-backs of between 19m and 22m to the west of the access road and between 45m and 60m to the east of the access road.

4. The Parish Council welcome this change but are disappointed that the effect of this landscape change has not translated to a modest reduction the housing numbers so that there remains overall a very dense development as explained in the updated Planning Statement: *Limitation of housing density closest to the Houghton Road site access to not more than 23 dwellings per hectare to promote a 'village' feel at the site entrance. The overall housing density across the housing development area is 28 dwellings per hectare*.

5. The Planning Statement addendum also explains changes to the building heights along the southern and eastern edge where concerns over coalescence arise:

Introduction of a lower maximum building height limit around the southern and eastern edges of the housing development area, reflecting the sensitivity of these locations fronting onto major open spaces. The Revised Parameter Plan shows a general maximum building height limit of 10 metres to ridgeline from finished ground level, but only 8.5 metres maximum height to ridgeline at the periphery of the housing development area.

6. However this change in height fails to address the planning harm caused by coalescence of the Parish with St Ives and remains the Parish Council's primary objection. It is a breach of the Neighbourhood Plan Policy HWNP3 – Anti-coalescence (see para 16 and discussion at paras 24-28 below and the PC's expert report on loss of separation (Peter Radmall) submitted in June 2023)

7. To be frank, the Parish Council can see no good reason (e.g., viability concerns) why the development cannot proceed with relatively minor adjustments to the quantum of new housing to protect this sensitive site and deliver the much needed housing. The intransigent stance of the Homes England in refusing to work with the Parish Council is regrettable and not in the spirit of efficient delivery of new housing into an established community - and wholly at odds with the Government's drive to bring housing forward and reflects entrenched attitudes of non-engagement. Angela Rayner would be disappointed.

8. As officers may recall as far back as January 2022 our clients sought a pre-app with officers on a reduced density scheme with a suitable settlement buffer in order to open a constructive dialogue with the Council and the applicant on how to deliver housing on the site some 30 months ago. These efforts to work together were rebuffed by the Council who refused to engage in the pre-app and not taken seriously by Homes England when the Parish Council sought discussion of their alternative scheme.

LVA review

9. Our June 2023 representations were accompanied by two reports prepared by Peter Radmall Associates (i) *Review of Applicant's Landscape and Visual Appraisal* ("**the First LVA Review**"), which identifies failings in the applicant's 2023 Landscape and Visual Appraisal ("**2023 LVA**") and (ii) the *Implications for Separation between Houghton and St Ives* ("**the Separation Report**"), which considers the Parish Council's concerns about the Development's implications for coalescence and further urbanisation.

10. Mr Radmall has now considered the updated information and the applicant's revised 2024 LVA ("**the 2024 LVA")** and his October 2024 Update Review is enclosed.

11. In summary, as we said in June 2023, the Application conflicts with both the development plan and national planning policy. Material considerations also weigh against the grant of permission. In particular:

    (i) The Development is contrary to a number of policies of the Huntingdonshire Local Plan to 2036 ("**the Local Plan**"), the Development:

        (a) Does not protect the character of Houghton & Wyton, contrary to *Policy LP 2 – Strategy for Development*;

        (b) Does not contribute to the landscape, wildlife, cultural and historical value of the area, contrary to *Policy LP 3 – Green Infrastructure*;

(c) Does not recognise the intrinsic character and beauty of the countryside, contrary to *Policy LP 10 – The Countryside*;

(d) Does not respond positively to its context and does not apply the guidance in the Huntingdonshire Landscape and Townscape Assessment (2022) ("**the HLTA 2022**"), contrary to *Policy LP 11 – Design Context*; and

(e) Does not contribute positively to the area's character and identity or integrate with topography and landscape, contrary to *Policy LP 12 – Design Implementation;*

(f) Conflicts with the Site Allocation policy LP SI 1 (for St Ives Town) and applies the 10% tolerance found in text at D8 of the Local Plan in an arguably unlawful way by failing to adopt a masterplan at the outset and then proceeding to rely on the 10% tolerance in plan text at D8 for this Site rather than application of the tolerance across the whole SI 1 Allocation, leading to a demonstrable over-development of this Site, the remaining parcel of the SI 1 Allocation.

(ii) The Development is contrary to the policies of the Houghton & Wyton Neighbourhood Development Plan ("**the Neighbourhood Plan**"):

(a) the Development is outside of the Houghton & Wyton built up area and is within the open countryside and does not comply with the relevant policies for building in the countryside, contrary to *Policy HWNP1 – Houghton & Wyton built up area*;

(b) the Development does not respect the individual and distinct identities of the village of Houghton & Wyton and the town of St Ives because it individually and cumulatively results in the loss of visual and physical separation between those two settlements and would lead to their coalescence, contrary to *Policy HWNP3 – Anti-coalescence*.

(iii) The Applicant's 2024 LVA does not demonstrate that the Development complies with current 2023 *Paragraph 180 of the NPPF* requiring that it contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes or recognising the intrinsic character and beauty of the countryside.

The Site

12. The Site represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St. Ives and lies within the Great Ouse Valley Landscape Character Area.[1] It forms part of Local Plan allocation SI 1 St Ives West ("**the SI 1 Allocation**"),[2] which allows for mixed use and approximately 400 homes, 23 ha of green space and social and community facilities. The proposed Development is the last of four separate parcels to be developed on the SI 1 Allocation, the other three being: (1)

[1] defined on pg.77 of the Huntingdonshire Landscape and Townscape SPD (2022).
[2] Page 195, Huntingdonshire Local Plan

Houghton Grange Phase 1 - 107 houses, (2) The Spires - 186 houses, (3) The How - 19 houses. The Site is nevertheless to be regarded as open countryside.[3]

Planning policy

NPPF 180

13. Paragraph 180 of the NPPF provides that (emphasis added):

> *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
>
> *(a) protecting and enhancing valued landscapes […]*
> *(b) recognising the intrinsic character and beauty of the countryside […]*

The Local Plan

14. The Local Plan was adopted in May 2019 and includes the Site as allocation SI 1, St Ives West, for the redevelopment of Houghton Grange for approximately 400 homes, 23ha of green space and social and community facilities to meet the needs arising from the development. The policy includes *inter alia* the requirement for *completion of a detailed master planning exercise to be agreed with the Council* and (g) *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires* (emphasis added)

15. In addition, there are numerous Local Plan policies relevant to the application, and these include:

> LP 2 Strategy for Development: provides that the development strategy for Huntingdonshire is to *"Protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside"*.
>
> LP 3 Green Infrastructure: states that proposals should support green infrastructure, incorporating open space and protecting and enhancing the existing network (with reference to the Cambridgeshire Strategic Green Infrastructure Network). LP3 also states that a proposal within the Ouse Valley Landscape Character Area will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area.
>
> LP 11 Design Context: states that a proposal will be supported where it positively responds to its context and has drawn inspiration from key characteristics of the surroundings. Proposals need to apply the guidance in the Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Townscape Assessment SPD

[3] Policy SI 1 provides (pg. 195) (underlining added): "Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications."

(2007) or successor documents[4] and applicable conservation area character statements.

LP 12 Design Implementation: states that a proposal will be supported where it contributes positively to an area's character and identity, integrating with topography and landscape

The Neighbourhood Plan

16. The Neighbourhood Plan, adopted March 2018, provides:

> ***Policy HWNP3 – Anti-coalescence***
> *Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements, or would lead to their coalescence (emphasis added).*

*The Huntingdonshire Landscape and Townscape SPD 2022 ("**the HLT SPD**")*

17. The parish of Houghton and Wyton lies within the Great Ouse Valley landscape character area ("**GOV LCA**") identified in the HLT SPD, which notes that the landscape character of such parishes is derived from, and directly influenced by, the Great Ouse Valley. The HLT SPD requires:

> ***Development proposals should:***
> - *Enrich the area by reinforcing its special qualities and acknowledging its distinct local character.*
> - *Use appropriate building materials to retain the distinctive local character of villages.*
> - *Maintain or enhance water quality and quantity and not lead to any adverse impact on flood risk or flood defences.*
> - *Protect and enhance the strategic green corridor formed by the river valley, particularly where it passes through settlements.*
> - *Minimise the environmental impacts of recreational activities.*
> - *Protect and enhance the ecological value of the river, its margins and the valley floor.*
> - *Promote opportunities for wildlife and conservation initiatives to support and enhance the area's biodiversity.*
> - *Protect the setting of historic structure such as bridges and mill buildings.*
> - *Encourage public access along the Great Ouse Valley through.*

Representations

18. As undeveloped land, the Site is currently regarded as open countryside[5] and represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St Ives. The visual and coalescence impacts of the Development are therefore

[4] The Huntingdonshire Landscape and Townscape Assessment SPD (2007) has been superseded by the Huntingdonshire Landscape and Townscape SPD (2022)

[5] Policy SI 1 of the Local Plan; Policy HWNP1 of the Neighbourhood Plan.

of particular concern and require careful attention as required by LP SI 1(g) mentioned above.

19. Despite this, the revisions which comprise the current scheme do not adequately address a number of important issues relevant to the 2022 updated Huntingdonshire Landscape and Townscape Assessment. These are also not addressed in the 2024 LVA.

20. Mr Radmall's First LVA Review highlighted a number of serious flaws with the Applicant's 2023 LVA and its findings, including:

    (i) Failing to assess the character of the site by considering its landscape/ perceptual attributes as receptors;
    (ii) Failing to assess the site's representativeness or and contribution to published character types/ areas
    (iii) Failing to assess the site's landscape components and perceptual attributes at a local level, including with reference to the adjoining conservation areas.

21. On this basis Mr Radmall concluded that the 2023 LVA played down the severity of effects, particularly those on the most sensitive visual receptors and, that smaller-scale variations at a local level may have been overlooked. These serious failures have not been fully rectified as recorded in Mr Radmall's Update Review: -

    "3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered."

22. Because the 2024 LVA fails to assess the Development's effects on site character, including its component landscape/perceptual attributes, and does not explicitly assess the site's representativeness of/contribution to the published LCAs[6] (especially the HLT SPD 2022, which requires that development proposals should enrich the area by reinforcing its special qualities and acknowledging its distinct local character), it does not demonstrate that the Development does not conflict with the Local Plan policies identified above, or *Paragraph 180(b)* of the NPPF.

23. Additionally, the 2024 LVA failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the Site (Radmall Update Review paras 2.10-2.13). The 2024 LVA also fails to consider whether the Site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB (Radmall Update Review 2.14-2.17). These failures mean that it is not demonstrated that the development complies with *Paragraph 180(a)* of the NPPF.

24. As explained in Mr Radmall's June 2023 Separation Report, the Development would encroach into open countryside and have a further urbanising influence on the locality, contrary to Neighbourhood Plan *Policy HWNP1 – Houghton & Wyton built up area,* Local Plan *Policy LP 10 – The Countryside*, SI 1 (g) and *Paragraph 174(b)* of the NPPF. None of these concerns have been addressed as recorded in the Update Review:

[6] LVA Review, section 5.

4.2 Having reviewed the 2024 LVA, and compared their respective parameter plans, I consider those conclusions to remain fundamentally valid. Unsurprisingly, the 2024 LVA makes no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives.

Anti-coalescence

25. The above failures related to the assessment of character also mean that there has not been adequate assessment taking account of the distinct identities of the village of Houghton & Wyton and the town of St Ives for the purposes of assessing compliance with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*. The Development presents very serious loss of openness of the remaining green gap between Houghton & Wyton and St Ives and would result in an increase in the actual and perceived coalescence between Houghton & Wyton and St Ives and urbanisation, such that the Development does not accord with the development principles illustrated in *Local Plan Policy SI 1* and conflicts with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*.

26. Indeed, it is apparent from the Applicant's DAS addendum that, notwithstanding the strong policy requirement to retain actual and perceived separation between Houghton & Wyton and St Ives, the Applicant has failed properly to consider the importance of avoiding coalescence between the settlements in designing its development.

27. As the 2023 Separation Report makes clear, extending built development eastward in close proximity to the main road running along the northern edge of the Site exacerbates the actual and perceived loss of separation and tightens the pinch points between the settlements in the vicinity of the water tower, which is entirely contrary to the schematic principles proposed in the LP SI 1 Allocation. Whilst the current scheme has increased the development offset from Houghton Road and infilled this with additional tree planting in order to provide greater **visual** separation, it provides no material protection of **spatial** separation, and therefore continues to contribute to increased coalescence between the settlements.

28. Indeed, it is notable that the Schematic Layout included with Policy SI 1 Allocation deliberately leaves a green buffer to the east of the water tower. The design evolution in sections 4.3-4.4 of the Addendum DAS demonstrates that, contrary to the requirements of development plan policy, none of the design options tested involved any consideration of leaving open this most sensitive area of open countryside. The proposed development has thus, from inception, been contrary to adopted development plan policy. The Applicant has simply never considered, tested or otherwise assessed a proposal which would achieve the approach mandated by development plan policy.

29. There is a ready explanation why and this is found in a flawed interpretation of the policy buffer of +/- 10% above 400 dwelling.

Flawed application of 10% tolerance (LP text D8[7])

30. The harmful landscape impacts and loss of settlement separation is the direct consequence of the applicant's aggressive and potentially legally flawed interpretation and application of the 10% tolerance found in a text in Section D: Allocations at D8 which

[7] D8 provides for flexibility in delivering allocations and proposes a 10% tolerance either side of the allocation figure.

Homes England has relied on to increase the number of dwellings on this Site, and the failure early to adopt a Masterplan for the whole of the whole of the SI 1 Allocation.

31. These concerns have been raised in correspondence with Homes England multiple times and Homes England have failed repeatedly to engage with the Parish Council on a way forward for successful development of the Site. It has latched on to the figure of 120 dwellings and not budged. To be clear 120 dwellings eats into the plus 10% and causes material planning harm.

32. The material planning harm arising from the Application arises from two inter-related material failures early on in the commencement of the development of the SI 1 Allocation:

    (1) The first is HE's failure to agree with adjoining landowners and submit for approval a masterplan for the entire SI 1 Allocation before approvals in 2021-2022 for the Grange Phase 1 and the How (19/01180/REM and 19/02280/FUL respectively), as required by the policy. This was a critical requirement in the policy that was never achieved.

    (2) The second is that Homes England has adopted an arguably flawed legal interpretation of an application of the 10% tolerance found in text at D8 which results in overdevelopment of this Site, the last parcel that comprises the SI 1 Allocation.

33. ***Had a masterplan been in place as required by SI 1 (a) to guide development across the SI 1 Allocation, it would have been possible to decide at the outset whether and how best to use the 10% tolerance <u>across the SI 1 Allocation</u> and in accordance with the indicative layout in policy SI 1.***

34. As matters stand, there was no agreement through the masterplan process on how to allocate the 10% tolerance, and now Homes England is seeking to take advantage of the entire 10% tolerance which applies for the whole allocation of 400 dwellings on this Site, despite the Site being the last remaining (and arguably most sensitive) parcel of undeveloped land within the SI 1 Allocation.

35. In other words, the Applicant's approach is to seek to rely on the fact that it did not include the relevant pro rata of the 10% tolerance on any of the other three parcels which comprise the SI 1 Allocation as a justification for an excess of new dwellings well in excess of 10% on the last Site's capacity. This is a fundamentally flawed policy interpretation and application of policy resulting in material planning harm, namely breaches of anti-coalescence objectives in policies in the District Local Plan and the Houghton & Wyton Neighbourhood Plan (P1 and P3). If the current revised parameter plan is approved without the changes they seek to address their concerns, the Parish Council are prepared to test these policies and the erroneous approach to the 'tolerance' through the courts. For this purpose, and reluctantly, the Parish Council have already retained Counsel, Charles Streeten of Francis Taylor Building, in anticipation of any litigation.

36. To reiterate, as has been made clear in meeting with Homes England and the Council officers, the Parish Council can and would support a scheme with modest changes to the two aspects including to the north of Site, which at present presents a hard and overdeveloped edge. They advocated for the Site frontage pulled back from Houghton Road to introduce a softer landscaped edge to the access into the Development, as shown in the indicative plan to the SI 1 Allocation. This will help to define a clear division between Houghton & Wyton from the town of St Ives. This separation would also improve the amenity for these edge-facing houses otherwise adversely impacted by the traffic on Houghton Road.

37. The second change that the Parish Council has long requested is regarding the footprint of the development to reduce the spread of the eastern edge so as to reduce the overall developed area to provide a landscape buffer which separates the parish from St. Ives. This has not changed to reduce the loss of spatial separation as explained in the Peter Radmall report.

38. These changes are economically viable. FOI correspondence with Homes England confirms that there is no commercial necessity for the proposed quantum of housing on this Site, the last parcel of the SI 1 Allocation in the Local Plan 2019. FOI references RFI3582 and RFI13408 reveal that the total Homes England site was valued at £7.2m, with Houghton Grange Phase 1/Morris Homes sold for 4.6m, hence leaving a residual value for the Site of £2.6m.

39. It has not been possible to access the planning portal to review updated information from the County Council on Highways. The issues occurred on 22 October and have been reported to Development Control. Once we are able to review the new information we will write separately if necessary.

Conclusion

40. For the reasons detailed by Mr Radmall in the Update Review, there are deficiencies in the Applicant's 2024 LVA such that its conclusions cannot be relied upon and the Development conflicts with policy on landscape.

41. Furthermore, as confirmed by the findings in the Parish Council's Separation Report, the Development has implications for coalescence, urbanisation and impacts on openness such that it conflicts with the policies identified above.

42. For the reasons set out above, **the Application should be Refused.**

Yours faithfully

[redacted]

RICHARD BUXTON SOLICITORS

Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT

REVIEW OF APPLICANT'S REVISED LVA

on behalf of

Houghton and Wyton Parish Council

October 2024



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EXECUTIVE SUMMARY

1. This report, issued on behalf of Houghton & Wyton Parish Council, comprises a review of the applicant's Revised Landscape and Visual Appraisal (LVA) issued in September 2024.

2. It assesses the degree to which the Revised LVA has responded to the concerns raised in the First LVA Review carried out in June 2023. It also comments on any implications for separation between the village and St. Ives, which is a key concern of the Council and the subject of a separate report issued at the same time as the First LVA Review.

3. Of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three have been partially addressed, and the remaining four have received no response.

4. As a result, concerns remain in relation to the following:

   - The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley;
   - The LVA's focus on published character areas, at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
   - Unexplained variations in the sensitivity of visual receptors; and
   - The site's contribution to local character and to separation between the settlements.

5. As a result, the proposed development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.

6. In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a reliable basis for determination.

7. For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.

1. Introduction

1.1 Peter Radmall Associates (PRA) were commissioned by Houghton and Wyton Parish Council in June 2023 to consider the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT). This took the form of a review of the landscape and visual appraisal (LVA) issued by AECOM in March 2023. I refer to these as the **2023 LVA** and the **First LVA Review**.

1.2 At the same time (June 2023), I produced a **Separation Report,** which considered the Implications for Separation between Houghton and St Ives, one of the key concerns of the Parish Council.

1.3 In response to comments from Huntingdonshire District Council (HDC) and other consultees, together with changes to the scheme parameters and some policy and published character references, a revised LVA was issued in September 2024 (**the 2024 LVA**).

1.4 This document reviews the 2024 LVA, advises on whether the areas of potential concern identified in the first LVA review have been addressed, and comments on the degree of reliance that can be placed upon it. I refer to it as the **Second LVA Review**.

1.5 This review has been based on a desktop study only – as agreed with the Parish Council, a site visit to the two additional viewpoints addressed in the 2024 LVA has not been considered necessary. The same limitations apply as for the First LVA Review, which are as follows:

- It does not purport to be an LVA/LVIA in its own right, and therefore does not attempt to identify and categorise all the potential effects;
- It has not included a detailed technical audit of the photographic and visualization material, which has been taken as read;
- It relies on the original fieldwork, which was confined to publicly-accessible locations, and visits to selected viewpoints;
- It has not considered the status of, or the weight to be given to, relevant policy; and
- Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

2. Response to First LVA Review Concerns

2.1 The First LVA Review assessed the 2023 LVA against a checklist of compliance with good practice, from which it identified a number of matters of potential concern. These may be summarized as follows:

i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;

ii. The site's representativeness of/contribution to the published LCAs has not been assessed;

iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors;

iv. There has been no explicit consideration of whether the site may form part of a valued landscape;

v. The assessment views do not appear to have been agreed with the LPA;

vi. The location/representativeness of some of the viewpoints may be questioned – the Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered;

vii. Seasonal influences on visibility and effects are not evident from the photography/visualizations;

viii. The reliability of the visual material has been taken as read rather than subject to a technical audit; and

ix. The sensitivity of some visual receptors appears to have been under-stated.

2.2 In addition, the Visual Assessment part of the review raised a number of subsidiary matters such as the ZTV and viewpoints. I have therefore added these to produce a consolidated list of matters against which to review the 2024 LVA.

2.3 The Second LVA Review is reported in the remainder of this section. For each matter of concern, explanatory text from the First LVA Review is provided, followed by a comment on the completeness of the response provided in the 2024 LVA, using the following descriptive scale:

- FULL: The matter has been fully addressed;
- NONE: No explicit response has been provided; or

- PARTIAL: Whilst some response has been provided, queries or uncertainties remain.

i. Assessment of the Site and its Component/Perceptual Attributes as a Landscape Receptor

2.4 GLVIA3 advises that "*The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected…, often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects*." [GLVIA3, 5.34 bullet 1].

2.5 The 2023 LVA did not follow this approach, identifying only the district-wide landscape character areas (LCAs)as receptors. Whilst the 2024 LVA also considers the townscape character areas (CAs) within St. Ives, it fails to consider individual landscape components and perceptual factors (e.g. pastoral land, openness). As a result, the 2024 LVA perpetuates this omission. Response to First LVA Review: **NONE**.

ii. The site's representativeness of/contribution to the published LCAs has not been assessed

2.6 The 2023 LVA included no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs. It was therefore difficult to understand how it had arrived at its assessment of effects on them.

2.7 The 2024 LVA has updated the baseline LCAs in accordance with the Huntingdonshire Landscape and Townscape SPD, 2022, and includes new descriptions of the relevant St. Ives character areas [Ref 2024 LVA 5.2.3.2].

2.8 The site is located within the Western Periphery (Townscape) Character Area, and the Great Ouse Valley LCA, which are assessed as being of Medium and High sensitivity respectively. There is still, however, no explicit reference to the degree to which the characteristics of the site contribute to/detract from this CA/LCA, and therefore to how the development's impact on them has been derived. Response to First LVA Review: **PARTIAL**.

iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors

2.9 Whilst conservation areas are primarily heritage designations, they often have landscape (or townscape) implications, particularly where they may include greenfield land and/or possess a wider setting (which is the case here). Their conservation status suggests that they should be regarded as being of high landscape/townscape sensitivity.

2.10 The First LVA review noted that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The 2023 LVA did not assess whether there would be any effects on the character or setting of either CA.

2.11 The 2024 LVA also contains no such assessment (or cross-reference to a Heritage Statement or similar). However, effects on these CAs, and their settings, are reported in the Cultural Heritage Desk-Based Assessment (DBA, AECOM, December 2021). Whilst it is reasonable that a parallel assessment within the LVA has not been provided, an explicit reference to the DBA – and in particular to how it has influenced landscape value – would have been useful. Response to First LVA Review: **NONE**.

iv. <u>There has been no explicit consideration of whether the site may form part of a valued landscape</u>[1]

2.12 The First LVIA Review pointed out that the south-western part of the site falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton Conservation Area. Its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.

2.13 The site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB, now National Landscape). The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.

2.14 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site may contribute to that value. This possibility was not acknowledged in the 2023 LVA, although the Great Ouse Valley LCA is considered to be of high sensitivity. Such an acknowledgement is also absent from the 2024 LVA. Response to First LVA Review: **NONE**.

v. <u>The assessment views do not appear to have been agreed with the LPA</u>

2.15 The 2024 LVA confirms that this agreement was secured in December 2020 [Ref 2024 LVA 6.1.1]. Response to First LVA Review: **FULL**.

vi. <u>In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional</u>

[1] As per NPPF180(a)

viewpoints looking towards the site from both directions along Houghton Road would have been helpful

2.16 No additional views in this location have been added for the 2024 LVA. However, additional viewpoints requested by HDC (3a and 18) have been added, together with two longer-distance views from the south-east (21/22). Response to First LVA Review: **PARTIAL**.

vii. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.

2.17 The request for longer-distance views from the south/south-east has been addressed in the 2024 LVA by the addition of VPs 21/22. No additional short-range views have been provided. Response to First LVA Review: **PARTIAL**.

viii. The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4m in height, but their ZTVs typically extend to 5km)

2.18 The ZTV has been extended to 5km for the 2024 LVA [Ref 2024 LVA Figures 4a/5a]. Response to First LVA Review: **FULL**.

ix. Winter and summer photography should have been provided for each viewpoint

2.19 The First LVA Review commented that, whilst the 2023 LVA allowed for variations in effects between summer and winter conditions, these were not evident in the photography and visualizations, which only showed the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability.

2.20 The 2024 LVA has responded as follows [Ref 2024 LVA 1.3]: "Winter photography was captured in January 2024 from the 20 viewpoints. This was as closely matched to the summer photography as practical. Baseline summer and winter photography have both been accurately annotated to show the horizontal site extents in the views, based on the 3d model of the main development area. This has been reviewed and updated for the summer photography, which was previously annotated based on approximate development extents." Response to First LVA Review: **FULL**.

x. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable

2.21 The First LVA Review commented that, of the six receptor groups comprising users of PRoWs or public access land, three are of medium sensitivity and three

are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that "*visual receptors most susceptible to change are…likely to include…residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way…*".

2.22 There has been no change to 2024 LVA Appendix A: Methodology in relation to the sensitivity of visual receptors. As a result, potential concerns over the reliability of the 2024 LVA remain in relation to visual impacts. Response to First LVA Review: **NONE**.

Summary of LVA Response

2.23 Of the ten matters highlighted in the First Review, three have received a full response in the 2024 LVA, four have received no explicit response, and the remaining three have received a partial response. Those for which a full response has been provided relate to the agreement of viewpoint locations, the extension of the ZTV to 5km and the provision of summer/winter photography.

2.24 Two of the matters to which partial responses have been provided relate to the inclusion of additional viewpoints in the 2024 LVA. These comprise the two viewpoints requested by HDC, and two longer-distance viewpoints to the south/south-east that reflect the extended ZTV. No additional close-range viewpoints, as requested by the Parish Council, have been provided.

2.25 Notably, there has been no explicit response to the matters relating to the assessment of site character and its component attributes, its contribution to the published LCAs/CAs, the Conservation Areas or sensitive visual receptors. Neither has any explanation been provided as to the reason for this absence. It seems likely, however, that the consultation comments from HDC have been prioritised, together with more obviously technical matters, whilst those which challenge the judgmental basis for the LVA have remained unanswered.

3. Implications for the Reliability of the 2024 LVA

3.1 My advice to the Parish Council from the First Review was that "*…the conclusions of the [2023] LVA should not necessarily be taken at face value, without considering the points raised in this review*".

3.2 In particular, I advised that "*…the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects, notably those on the most sensitive visual receptors within some of the closest-range views*".

3.3 I also noted that "*…the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the [2023] LVA to overlook smaller-scale variations in effects that could be meaningful at a local level.*"

3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered.

3.5 One final comment should be made about the reliability of the 2024 LVA. Section 1.3 of the 2024 LVA, bullet 1, states the following:

The Parameter Plan has been updated. This Revised LVA considers the parameter plan shown in Appendix B (dated 06/11/23). The plan has been amended since (Rev 06, dated 08/08/2024), which includes a greater set-back of development from Houghton Road, with significantly more tree planting between built development and Houghton Road than is considered in this Revised LVA

3.6 For reference purposes, the parameter plan from revised LVA Appendix B is reproduced in **Figure 3.1**. The original version should be accessed for greater legibility, reference to the key etc.

3.7 For comparison, the parameter plan from the 2024 LVA review is shown in **Figure 3.2**.

Figure 3.1: Parameter Plan from 2024 LVA Appendix B



Figure 3.2: Parameter Plan from 2023 LVA Review



3.8 Even allowing for slight disparities in scale (due to both images having been copied as screen-shots), material differences between them are not readily visible. Whilst the proposed development area has not changed, the most obvious difference of relevance to this discussion is the introduction of a peripheral zone within which the height parameters have been adjusted downwards (from 10m to 8.5m), in response to comments from HDC's urban design officer.

3.9 However, as the text from the 2024 LVA 1.3 points out, the parameter plan shown in Figure 3.1 is not the latest version. This plan was updated in August 2024 to show a greater offset of development from Houghton Road, together with more tree planting. These changes are not reflected in the 2024 LVA, which therefore may not provide the complete information required before the application can be reliably determined.

4. Implications for Separation between Houghton + Wyton and St. Ives

4.1 As noted above, in June 2023, alongside my First LVA Review, I produced a report on the development's "*Implications for Separation between Houghton and St. Ives*". The Summary and Conclusion of this report was as follows:

- The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road.

- The majority of the site retains a greenfield character that reinforces its role as part of the open countryside.

- Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).

- The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road.

- This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.

- The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires.

- This openness is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.

- Although development would occupy only c22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road.

- As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.

- The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west.

- The visualizations in the 2023 LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.

- The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins.

- This is clearly contrary to NP Policy 3, and is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.

- The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b)[2].

- The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.

4.2 Having reviewed the 2024 LVA, and compared their respective parameter plans, I consider those conclusions to remain fundamentally valid. Unsurprisingly, the 2024 LVA makes no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives.

4.3 However, the 2024 LVA does assess the development's impact on the St. Ives urban character areas (CAs), of which the Western Periphery CA - in which the site is located – is most relevant. This is shown as the green-shaded area on **Figure 4.1**.

4.4 As its name suggests, this CA forms the western fringe of the town, comprising a combination of built-up areas (Garnier Drive and The Spires), mature tree belts and open grassland. The area's association with the Great Ouse Valley, the Thicket Path and the Houghton and Wyton conservation area is acknowledged in the revised LVA to be of "increased local value".

4.5 Overall, the Western Periphery CA is considered in the revised LVA to be of Medium value and Low susceptibility, giving rise to Medium sensitivity [Ref 2024 LVA, Table 5.2.1-1]. As can be seen from Figure 4.1, the proposed scheme would introduce a cluster of built development up to 10m high onto the central/northern part of the site, which is currently open land. This is

[2] Now NPPF180(b)

considered in the 2024 LVA to amount to a Low magnitude of change, which in combination with Medium sensitivity gives rise to a Minor Adverse effect at Year 1 [Ref 2024 LVA 9.1.2.3].

Figure 4.1: Relationship to Western Periphery Character Area



Extracted from 2024 LVA Appendix B, Figure 3: Published Character Areas

4.6 In my opinion, the predicted Minor Adverse effect under-states both the susceptibility to change of the green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. Comparison of Figures 3.1 and 3.2 indicates that there has been no material reduction in this degree of encroachment as the masterplan has evolved, which cannot reasonably be described as a "slight alteration" to the CA [Ref 2024 LVA 9.1.2.1].

4.7 The 2024 LVA refers to the retention of a "green wedge of open space" between the development and The Spires. As pointed out in the conclusion to the original LVA review, however, the width of the east/west green gap between Houghton & Wyton and St. Ives (which falls within this CA) would be reduced by about two-thirds. The peripheral and transitional character of the CA – and thereby its contribution to separation between the settlements – would be further eroded by the urbanizing effect of the proposal.

5. Summary

5.1 This review of the Revised LVA concludes that, of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three more have been partially addressed, and the remaining four have received no response.

5.2 Concerns remain in particular that:

- The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley, may have been under-stated;
- The LVA's focus on published character areas has been at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
- There are unexplained variations in the sensitivity of visual receptors; and
- The site's contribution to local character and to separation between the village and St. Ives has not been recognized.

5.3 As a result, the LVA may have understated some of the predicted effects, including the degree to which the development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.

5.4 In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a wholly reliable basis for determination.

5.5 For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.

[redacted]

From: DevelopmentControl
Sent: 28 February 2025 17:01
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Categories: [redacted]

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 28/02/2025 5:00 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	[redacted]

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Houghton & Wyton Parish Council recommend that these applications be REFUSED for the following reasons: Please see the response submitted on behalf of the Parish Council by Richard Buxton Solicitors. See also the full submission sent to DMAdmin and [redacted] on 28 Feb 2025 A review of the Landscape Visual Assessment by Peter Radmall Associates is attached and forms a material part of this comment. We would like to particularly point out 1. The amended proposal fails to grasp that this development is attached to Houghton Grange Phase 1 - an extension of Houghton & Wyton, a village rather than the Town of St.Ives itself. And if approved without further amendments will result in planning harm by linking the two

distinctly different settlements.

The proposed development is still located too close to the main road, harming the entrance/exit to the village and green gateway to the town.

By infilling the land between the entrance road and A1123 the proposal does not correspond with the Local Plan policy illustration of what is considered acceptable, all of which increases the actual and perceived sense of coalescence.

Homes England appear to reach the same conclusion when stating and admitting that when viewed from the A1123 the development 'would cause a pronounced change to the composition of the view'(section 9.1.3.2 Year 15 Visual Effects) and in the Revised Landscape and Visual Appraisal, that 'it would appear integrated into the settlement edge of St Ives.' in other words it would be seen as part of the town (9.1.3.1 Year 15 effects to Published Landscape Character Areas).

This concurs with [redacted], our own Landscape Assessor's view that it "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".

Kind regards

[redacted]

From: [redacted]
Sent: 28 February 2025 16:57
To: DMAdmin; Laura Fisher
Cc: [redacted]
Subject: Planning Application 23/00627/OUT Land between Houghton Grange and The How, Houghton Road, Houghton
Attachments: We sent you safe versions of your files; 2300627OUT Richard Buxton letter H&WPC 28022025.pdf; 2300627OUT Peter Radmall February 2025 LVA review (1).pdf; Houghton & Wyton reponse to 2300627OUT 28022025.pdf

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Please see the response from Houghton and Wyton Parish Council in respect of the application Ref 23/00627/OUT.
Please also refer to the submission from Richard Buxton Solicitors on our behalf, which is also attached for your reference.

Regards

[redacted]
Clerk to Houghton & Wyton Parish Council
[redacted]
www.houghtonwytonpc.co.uk

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Huntingdonshire District Council
Planning Development Control
Pathfinder House
St Mary's Street
Huntingdon PE29 3TN

Attn: Laura Fisher, Case Officer

28 February 2025

Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. Land between Houghton Grange and The How Houghton Road Houghton Ref: 23/00627/OUT

Houghton & Wyton Parish Council recommend that these applications be **REFUSED** for the following reasons:
Please see the response submitted on behalf of the Parish Council by [redacted] Buxton Solicitors.

A review of the Landscape Visual Assessment by Peter Radmall Associates is attached and forms a material part of this comment. We would like to particularly point out

1. The amended proposal fails to grasp that this development is attached to Houghton Grange Phase 1 - an extension of Houghton & Wyton, a village rather than the Town of St.Ives itself. And if approved without further amendments will result in planning harm by linking the two distinctly different settlements.

   The proposed development is still located too close to the main road, harming the entrance/exit to the village and green gateway to the town.

   By infilling the land between the entrance road and A1123 the proposal does not correspond with the Local Plan policy illustration of what is considered acceptable, all of which increases the actual and perceived sense of coalescence.

   Homes England appear to reach the same conclusion when stating and admitting that when viewed from the A1123 the development 'would cause a pronounced change to the composition of the view' (section 9.1.3.2 Year 15 Visual Effects) and in the Revised Landscape and Visual

St Mary's Centre, Chapel Lane, Houghton, Huntingdon, Cambridgeshire, PE28 2AY
[redacted] www.houghtonwytonpc.co.uk
VAT Registration Number 690 4004 55

Appraisal, that 'it would appear integrated into the settlement edge of St Ives.' in other words it would be seen as part of the town (9.1.3.1 Year 15 effects to Published Landscape Character Areas).

This concurs with Peter Radmall, our own Landscape Assessor's view that it "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".

This is not an outcome which either the Local Plan Policy SI 1 or HWNP 3 Anti- Coalescence Policy can support, and would result in planning harm.

The proposal squeezes the gap by two thirds alongside the road, and at its narrowest point by 69%, that is even before the reducing effects of the proposed new play area and associated pathways are taken into account which all has the effect of urbanising the area and joining the settlements (see below).

2. To this latter point, Homes England describe what is left of the gap as a natural green wedge. However they have failed to appreciate that the effectiveness and naturalness of it would be squeezed and reduced further by a built and equipped play area proposed to the east and positioned outside of the developed footprint i.e. within the gap/green wedge. Plus by adding numerous built pathways connecting and crossing the meadow to the town, together with the management of the area it will have a huge urbanising effect on what is supposed to be a natural countryside buffer. This is critical if any gap is to help distinguish between and reinforce the separate identities of the village and town. The Anti-coalescence policies in the relevant Neighbourhood (HWNP 3) and Local Plans (SI 1) form a vital part of the planning policy for this area and once again, do not support this approach and the planning harm that would result.

3. The proposed density of housing, in what is repeatedly acknowledged within Local Plan SI, to be a sensitive area is incongruous with both Houghton Grange phase 1, as well as the rest of the village. In fact the density would be considered quite high were it to form the edge of a town let alone the edge of a village.

   Continuing to maintain a total build of 120 homes would result in parts of the site having a built density of 33 dwellings per hectare (dph) which is far too intensive for the location. It would represent more than twice the density of the Houghton Grange Phase 1 site (16 dph) immediately next door and currently forming the edge of the village. In fact the proposal would result in an even higher density than for the Spires site (26 dph) on the edge of St.Ives. Replicating the Spires development for Houghton

Grange Phase 2 would only enhance the perception of coalescence as it will look, feel and actually become viewed as an extension of the Spires and therefore the town itself.

In our opinion, continuing to push for the +10% tolerance of the entire St.Ives west housing allocation to be built in this one remaining parcel of land between village and town shows a disregard for the guiding planning policies, the sensitivity of the location, the environment, the views of local people as well as design guidance. Even in the recent Local Plan Land Availability Assessment, a maximum housing density of 25 dph was used to help determine the housing potential of new sites on the edge of existing settlements.

4. Finally, it is felt that the tone of the application takes no account of local considerations from this parish and neighbouring councils.
We remain concerned that a single planning application should have taken over two years to get to this stage, to still be unresolved with so many questions surrounding it. To have been submitted with missing or out of date information supplied, with inadequate levels of engagement, requiring substantial amendments and resubmissions, having three separate consultations of varying sorts, resulting in nearly 270 documents and postings on line, and thousands of pounds of tax payers money being spent on professional help to support, hopefully to ensure planning policies are adhered to and a positive outcome for all achieved.

   We sincerely hope that lessons can be learned from this for the future.

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Huntingdonshire District Council
Planning Development Control
Pathfinder House
St Mary's Street
Huntingdon PE29 3TN

Our ref: HOU1/2/LPF
Your ref: 23/00627/OUT

28th February 2025

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

RE: Houghton Grange Phase 2 – Land Between Houghton Grange And The How Houghton Road Houghton ("the Site")

23/00627/OUT | Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works ("the Application")

1. We are instructed by Houghton & Wyton Parish Council and write following our previous correspondence and in response to updated information including a revised parameters plan (Rev 7 dated 19/12/24), revised LVA and revised D&A Addendum Statement issued in January 2025. These revisions are the third set of revised documents and follow a previous set of revisions published in September/October 2024. According to updated information the Application continues to seek consent for up to 120 dwellings. This letter updates our objection letter sent 22nd October 2024.

2. We enclose our October 2024 letter for ease of reference and ask that the two be read jointly as the former, for example, raises concerns as to the contents of the planning statement addendum, which has not been updated since October 2024. As such, this letter is to comment on the updated LVA and parameters plan and to update our position regarding it. We also include a short note regarding the D&A Addendum Statement.

3. Overall, while our clients appreciate that some points raised in October correspondence have now been addressed in the revised LVA. For example, consideration of the updated parameter plans available at the time of drafting. For the reasons set out below, the Parish Council **continues to maintain an objection to the Application**.

LVA review

4. Our June 2023 representations were accompanied by two reports prepared by Peter Radmall Associates (i) *Review of Applicant's Landscape and Visual Appraisal* ("**the First LVA Review**"), which identifies failings in the applicant's 2023 Landscape and Visual Appraisal ("**2023 LVA**") and (ii) the *Implications for Separation between Houghton and St Ives* ("**the Separation Report**"), which considers the Parish Council's concerns about the Development's implications for coalescence and further urbanisation.

5. Our October 2024 representations were accompanied by a further report by Mr Radmall, *Review of Applicant's Revised LVA* ("**the Second LVA Review**") which considered the updated information and the applicant's revised 2024 LVA ("**the 2024 LVA")**. This report continued to conclude that the proposed development "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".

6. Mr Radmall has now considered the updated information, including the updated parameter plan (Rev 7, published December 2024) and the applicant's revised 2025 LVA ("**the 2025 LVA**") and his February 2025 Update Review is enclosed with this letter.

7. Mr Radmall's report begins with consideration of the updated Rev 7 parameter plan as published in December 2024 ultimately concluding that *the fundamental parameters of the development remain* as set out in earlier revisions.

8. However, the report also notes that the most significant change to the parameter plan has occurred in the character of the green corridor with the introduction of a children's play area and additional paths. This would result in the existing rural appearance of the meadowland taking on a more suburban character. As such, there would be a reduction in separating function of the site as a green space to a material degree both spatially and visually meaning there would be little perceived break in the westward extension of the urban fringe of St Ives along the southern side of Houghton Road.

9. The report then continued to consider and advise on whether the areas of concern as identified in the second LVA review had been addressed and to comment on the degree of reliance that can be placed upon the latest version of the LVA.

10. The Second LVA Review, raised eight remaining concerns on behalf of the Parish Council in reference to the 2024 LVA. Mr Radmall considered all eight and found that six have not been addressed in the 2025 LVA, one had been partially addressed and one had been fully addressed.

11. The six concerns that remain as unaddressed are as follows.

    (i) *The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes* – the 2025 LVA continues to subsume these attributes within the LVA focus on published LCAs and CAs.

    (ii) *The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed*- the 2025 LVA makes no comment as the degree to which the site contributes or detracts from these areas, specifically in relation to the physical and perceived separation between St Ives and Houghton.

    (iii) *Conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors* – The conservation areas continued to not be identified as landscape receptors in the 2025 LVA.

    (iv) *There was no explicit consideration of whether the site may form part of a valued landscape* – The 2025 LVA does not include this consideration despite the Great Ouse Valley LCA being categorised as high value.

(v) *In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful* – There have been no additional viewpoints included in the 2025 LVA.

(vi) *The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered* – No additional viewpoints have been considered in the 2025 LVA.

12. The 2025 LVA, however, has partially addressed one concern as raised in October 2024 Review which stated that *Discrepancies in sensitivity between the same categories of visual receptors are not readily explicable*. Mr Radmall identifies that *Table 6.2.1-1 sets out how the sensitivity of specific receptors has been derived. In some cases, this sensitivity is readily understood (e.g. people walking across Houghton and Hemingford Meadows). Elsewhere, however, it is not clear why the sensitivity of intrinsically sensitive receptors such as residents appears to have been downgraded. There is a risk that viewing opportunity may have been confused with susceptibility, resulting in double-counting.*

13. The final concern as raised in the October 2024 was that the *LVA does not assess the latest version of the parameter plan*. However, this has been fully addressed as *the LVA assesses the December 2024 parameter plan, as described in LVA Section 7, updated Figure 6 and the updated Type 4 visualisations*.

14. In his conclusions, Mr Radmall states that *no explicit response has been made to most of the concerns remaining from the Second LVA Review. This should be noted by the Parish Council and by district councillors when they come to determine the application.*

15. Finally, a key concern throughout the Parish Council's objections has been the impact of the Development on the separation between Houghton & Wyton and St Ives. When considering the 2025 LVA, Mr Radmall states that *In my opinion, the predicted Minor Adverse effect [as attributed to the proposed development] under-states both the susceptibility to change of the residual green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. This encroachment is described in the LVA [ref 9.1.2.1] as a "slight alteration to a limited part of the CA". Whilst this may be the case spatially, it is unlikely to be the experience perceptually.*

16. In particular, the updated review notes that there would be a reduction in open green space by about two-thirds. This, when combined with the increased suburbanising character outlined in the December 2024 parameter plan would further erode the separation between the settlements of Houghton & Wyton and St Ives.

17. Indeed, this erosion has now been noted within the 2025 LVA itself at 9.1.3.1 which notes that by year 15 of operation the proposed development *would appear integrated into the settlement edge of St Ives* and at 9.1.3.2 states that at year 15 of operation the development when viewed from the residential properties on Garner Drive *would cause a noticeable change to the composition of the view*.

<u>Housing Density</u>

18. Separately to Mr Radmall's report, we would also like to draw attention to the fact that the updated D&A Addendum Statement notes an increased housing density of approximately 30 dwellings per hectare, with a maximum of 33 dwellings per hectare. This is in stark contrast to other developments within the SI 1 Allocation such as Houghton Grange Phase 1 which sits at 16 dwellings per hectare and the Spires at 26 dwellings per hectare. As such, this development is in stark contrast to existing developments and stands to change the character of the site.

Conclusion

19. For the reasons detailed by Mr Radmall in the 2025 Update Review, there are deficiencies in the Applicant's 2025 LVA such that its conclusions cannot be relied upon.

20. For the avoidance of doubt, our consistent objection remains the lack of openness between the proposed development and the existing settlements of Houghton & Wyton and St Ives. The revisions in the 2025 LVA do nothing to mitigate these concerns and in fact the revisions to the 2024 parameter plan have a suburbanising effect which creates further harm to reduce the existing gap.

21. Therefore, for the reasons set out above and our enclosed October 2024 objection, **the Application should be Refused.**

Yours faithfully

[redacted]

RICHARD BUXTON SOLICITORS

Proposed Residential Development on Land between Houghton Grange and The How

Houghton Road, Houghton

Application Ref: 23/00627/OUT

REVIEW OF JANUARY 2025 LANDSCAPE AND VISUAL APPRAISAL (LVA)

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

February 2025

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FIGURES

2.1 Updated Parameter Plan
2.2 Previous Version of Parameter Plan

EXECUTIVE SUMMARY

1. This report, issued on behalf of Houghton & Wyton Parish Council, comprises a review of the applicant's Third Revised Landscape and Visual Appraisal (LVA) issued in January 2025. It is referred to as the Third LVA Review, and assesses the degree to which the current LVA has responded to the concerns raised in the Second LVA Review carried out in October 2024.

2. It begins by commenting on the implications of the latest (December 2024) parameter plan for separation between the village and St. Ives. This is a key concern for the Parish Council and was the subject of a separate report issued on their behalf at the same time as our First LVA review.

3. The Second LVA Review found that three concerns had been only partially addressed, and four concerns had received no explicit response, in the previous version of the LVA. As a result, concerns remained in relation to the following:

   - The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley;
   - The LVA's focus on published character areas, at the expense of landscape components and perceptual attributes such as openness;
   - Unexplained variations in the sensitivity of visual receptors; and
   - The site's contribution to local character and to separation between the settlements.

5. In addition, the Second LVA Review highlighted the fact that the LVA had not assessed the latest version of the parameter plan at that time, which cast doubt on its reliability. This has now been rectified in the current LVA.

6. The latest parameter plan confirms the spatial and visual implications of the development for the residual green corridor that would remain to the east of the main developed area. Not only would this now account for only about one third of the width of the site, but it would acquire a suburban character as recreational space.

7. None of the remaining matters identified in the Second LVA Review have explicitly been addressed. The associated implications for the reliability of the LVA and for separation between Houghton and St. Ives also remain.

1. Introduction

1.1 Peter Radmall Associates (PRA) were commissioned by Houghton and Wyton Parish Council in June 2023 to consider the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT).

1.2 This took the form of a review of the landscape and visual appraisal (LVA) issued by AECOM in March 2023. These documents are referred to as the **2023 LVA** and the **First LVA Review**.

1.3 At the same time (June 2023), PRA produced a **Separation Report,** which considered the Implications for Separation between Houghton and St Ives, one of the key concerns of the Parish Council.

1.4 In response to comments from Huntingdonshire District Council (HDC) and other consultees, together with changes to the scheme parameters and some policy and published character references, a revised LVA was issued in September 2024 (**the 2024 LVA**). This was reviewed in the **Second LVA Review**, issued in October 2024.

1.5 The applicant has since issued (in January 2025) a further updated version of the LVA, which is reviewed in Section 3 of this document, referred to as the **Third LVA Review**. Its main purpose is to advise on whether the areas of potential concern identified in the second LVA review have been addressed, and to comment on the degree of reliance that can be placed upon the latest version of the LVA.

1.6 This is preceded (in Section 2) by a review of the latest (December 2024) parameter plan, with a commentary on its implications for separation between Houghton and St. Ives.

1.7 As with the previous (Second) LVA review, this document has been based on a desktop study only. The same limitations apply as for previous reviews, namely:

- It does not purport to be an LVA in its own right, and therefore does not attempt to identify and categorise all the potential effects;
- It has not included a detailed technical audit of the photographic and visualization material, which has been taken as read;
- It relies on the original fieldwork, which was confined to publicly-accessible locations and visits to selected viewpoints;

- It has not considered the status or weight to be given to relevant policy; and

- It does not address issues such as urban design, sustainability, biodiversity or cultural heritage, except where these may influence landscape/visual matters.

2. Implications of the Updated Parameter Plan

2.1 The December 2024 parameter plan is shown in **Figure 2.1** below. The submission version of the plan should be consulted to see it at full (A3) size and with the explanatory key.

Figure 2.1: Updated Parameter Plan



2.2 The main changes it shows are summarized in LVA Section 7 as follows: (It should be noted that these changes have been "taken as read" for the purposes of this review):

- Built development pulled away from the Houghton Road frontage, especially to the east of the access road, together with additional tree planting between Houghton Road and the development area;

- Limitation of housing density closest to the Houghton Road site access to not more than 23 dwellings per hectare. The overall housing density across the rest of the housing development area is 28 dwellings per hectare;

- Reduction in the scale and changed nature of the central open space within the housing development area, from an oval of 0.4 hectares to a linear park/spine of 0.16 hectares;

- Slight reduction in the scale of the Main Development Area (including the community orchard but excluding the central open space), from 4.53 hectares to 4.29 hectares;

- Increase in the scale of open space to the east of the site;

- Additional tree planting on the eastern boundary of the site;

- Extension of maximum 8.5m building height area to cover the northern part of the main developable area to the west of the access road;

- Consolidation of two proposed children's play areas into a single play area located to the south of the housing development area; and

- Western edge of the developable area boundary pulled eastwards slightly to show clear avoidance of root protection areas.

2.3 For comparative purposes, the previous (August 2024) version of the parameter plan, as used for the Second LVA Review, is shown in **Figure 2.2** below.

Figure 2.2: Previous Version of Parameter Plan



2.4 As can be seen, apart from the addition of information, and the changes described above, the fundamental parameters of the development remain. Specifically, the main development area occupies c61% of the Houghton Road frontage, with the remaining 39% occupied by the corridor of open space adjacent to the eastern boundary. Where the development area is at its widest, it occupies c69% of the width of the site, with the width of the green corridor reduced to c31%.

2.5 In addition, the character of that green corridor has also materially changed, with the introduction of a children's play area and additional paths. These changes harm the residually rural appearance of the corridor as meadowland, since it would take on a more suburban character. This would reflect its increased level of use as amenity space by the new residents, and a consequently more designed appearance and more intensive management regime (probably with a greater frequency of mowing).

2.6 The separating function of the site as green space will have been reduced to a material degree, both spatially and visually, even allowing for demolition of the former buildings. There will be little perceived break in the westward extension of St. Ives along the southern side of Houghton Road, to complement the existing development to the north.

2.7 The site lies within the Western Periphery Townscape Character Area (of St. Ives). The combination of the reduced extent and suburbanized character of the green corridor, together with the introduction of the "main developed area" to the west, will decrease the perception of the CA as part of the rural fringe, and thereby its contribution to maintaining separation between St. Ives and Houghton.

3. Concerns remaining from the Second LVA Review

3.1 The Second LVA Review assessed the 2024 LVA against a checklist of compliance with good practice, from which it identified a number of matters of potential concern. The matters that had not been explicitly addressed, or had been only partially addressed, in the LVA are summarized below.

i. The site and its component landscape/perceptual attributes had not been identified as landscape receptors for assessment purposes

3.2 GLVIA3 advises that "*The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected…, often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects.*" [GLVIA3, 5.34 bullet 1].

3.3 The 2023 LVA did not follow this approach, identifying only the district-wide landscape character areas (LCAs) as receptors. Whilst the 2024 LVA also assessed the townscape character areas (CAs) within St. Ives, it failed to consider individual landscape components and perceptual factors (e.g. pastoral land, openness).

ii The site's representativeness of/contribution to the published LCAs had not been fully assessed

3.4 The 2023 LVA included no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs. It was therefore difficult to understand how the LVA had arrived at its assessment of effects on them.

3.5 The 2024 LVA updated the baseline LCAs in accordance with the Huntingdonshire Landscape and Townscape SPD, 2022, and included new descriptions of the relevant St. Ives character areas [Ref 2024 LVA 5.2.3.2].

3.6 The site is located within the Western Periphery (Townscape) Character Area, and the Great Ouse Valley LCA, which were assessed as being of Medium and High sensitivity respectively. There was still, however, no explicit reference to the degree to which the characteristics of the site contribute to/detract from this CA/LCA, and therefore to how the development's impact on them has been derived.

iii. The conservation areas adjoining the site (and their component sub-areas) had not been identified as landscape receptors

3.7 Whilst conservation areas are primarily heritage designations, they often have landscape (or townscape) implications, particularly where they may include greenfield land and/or possess a wider setting (which is the case here). Their

conservation status suggests that they should be regarded as being of high landscape/townscape sensitivity.

3.8 The First LVA review noted that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The 2023 LVA did not assess whether there would be any effects on the character or setting of either CA.

3.9 The 2024 LVA also contained no such assessment (or cross-reference to a Heritage Statement or similar). However, effects on these CAs, and their settings, were reported in the Cultural Heritage Desk-Based Assessment (DBA, AECOM, December 2021). Whilst it is reasonable that a parallel assessment within the LVA has not been provided, an explicit reference to the DBA – and in particular to how it has influenced landscape value – would have been useful.

iv. There was no explicit consideration of whether the site may form part of a valued landscape[1]

3.10 The First LVIA Review pointed out that the south-western part of the site falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton Conservation Area. Its setting to the south extends across the Ouse valley, which is a landscape of some scenic, biodiversity, recreational and heritage value.

3.11 The site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB, now National Landscape). The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.

3.12 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site may contribute to that value. This possibility was not acknowledged in the 2023 LVA, although the Great Ouse Valley LCA is considered to be of high sensitivity. Such an acknowledgement was also absent from the 2024 LVA.

v. In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful

[1] As per NPPF187(a)

3.13 No additional views in this location were added for the 2024 LVA. However, additional viewpoints requested by HDC (3a and 18) were considered, together with two longer-distance views from the south-east (21/22). This deficiency therefore remained.

vi. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.

3.14 The request for longer-distance views from the south/south-east was addressed in the 2024 LVA by the addition of VPs 21/22. However, no additional short-range views were provided. This deficiency therefore remained.

vii. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable

3.15 The First LVA Review commented that, of the six receptor groups comprising users of PRoWs or public access land, three are of medium sensitivity and three are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that "*visual receptors most susceptible [PRA emphasis] to change are…likely to include…residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way…*".

3.16 There was no change to the approach to receptor sensitivity in the 2024 LVA Appendix A: Methodology. As a result, potential concerns over the reliability of the 2024 LVA in relation to visual impacts remained.

Summary of Response in 2024 LVA

3.17 Of the ten matters highlighted in the First Review, three received a full response in the 2024 LVA, four received no explicit response, and the remaining three received a partial response. Those for which a full response was provided relate to the agreement of viewpoint locations, the extension of the ZTV to 5km and the provision of summer/winter photography.

3.18 Two of the matters to which partial responses had been provided related to the inclusion of additional viewpoints. These comprised the two viewpoints requested by HDC, and two longer-distance viewpoints to the south/south-east that reflect the extended ZTV. No additional close-range viewpoints, as requested by the Parish Council, were provided.

3.19 Notably, there was no explicit response to the matters relating to the assessment of site character and its component attributes, its contribution to the published LCAs/CAs, the Conservation Areas or sensitive visual receptors.

Neither was any explanation provided as to the reason for this absence. It seems likely, however, that the consultation comments from HDC were prioritised, together with more obviously technical matters, whilst those from the Parish Council, or which sought to challenge the judgmental basis for the LVA, remained unanswered.

3.20 Finally, the 2024 LVA was based on a version of the development parameter plan that had been superseded two months earlier, and therefore did not assess the latest iteration of the scheme, although this has been rectified by the current LVA.

4. Review of the January 2025 LVA

4.1 **Table 4.1** below summarises the latest LVA's response to the concerns remaining from the 2024 LCA.

Table 4.1: 2025 LVA Response to Remaining Concerns

Concern	LVA Response
i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes	**Not addressed** – site attributes such as openness and residual rural character are not identified as landscape receptors, and are instead subsumed within the LVA focus on published LCAs/CAs.
ii. The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed	**Not addressed** – the site lies within the Western Periphery character area and adjacent to the Central Claylands and Great Ouse Valley LCAs. The LVA still makes no comment on the degree to which the site contributes to or detracts from these areas, specifically in relation to the physical and perceived separation between St. Ives and Houghton.
iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors	**Not addressed** – the Conservation Areas (and their settings) are still not identified as landscape receptors in LVA Table 6.2.1-1, although parts of them fall within the LCAs/CAs that are. Whilst this may be because Conservation Areas are considered to be heritage receptors, rather than landscape receptors, the close perceptual relationship between them should have been acknowledged.
iv. There was no explicit consideration of whether the site may form part of a valued landscape	**Not addressed** – even though the Great Ouse Valley LCA is categorised as being of high value in LVA Table 6.2.1-1, has been considered for AONB status, and its landscape value is reinforced by its heritage and recreational attributes.
v. In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful	**Not addressed** - no additional viewpoints, including those requested by the Parish Council, have been considered. It is therefore still difficult to appreciate the sequential change in openness and separation along Houghton Road.
vi. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of	**Not addressed** – no additional viewpoints, including those requested by the Parish Council, have been

	the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.	considered. Additional viewpoints requested by HDC had already been addressed in the previous versions of the LVA.
vii.	Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable	**Partially addressed** – Table 6.2.1-1 sets out how the sensitivity of specific receptors has been derived. In some cases, this sensitivity is readily understood (e.g. people walking across Houghton and Hemingford Meadows). Elsewhere, however, it is not clear why the sensitivity of intrinsically sensitive receptors such as residents appears to have been downgraded. There is a risk that viewing opportunity may have been confused with susceptibility, resulting in double-counting.
	LVA does not assess the latest version of the parameter plan	**Fully addressed** – the LVA assesses the December 2024 parameter plan, as described in LVA Section 7, updated Figure 6 and the updated Type 4 visualisations

4.2 The January LVA fully addresses only one of the remaining concerns from the October 2024 review, in that the assessment now reflects the latest (December 2024) parameter plan.

4.3 Of the remaining concerns, one – queries about the sensitivity of the visual receptors – is considered to have been partially addressed, but only in so far as it is possible to deduce how that sensitivity has been derived.

4.4 None of the other concerns raised on behalf of the Parish Council have been addressed explicitly – unlike the matters raised during consultation with HDC.

5. Summary and Conclusions

Implications for the Reliability of the 2025 LVA

5.1 The First LVA Review advised that "*...the conclusions of the [2023] LVA should not necessarily be taken at face value...*", and that "*...the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects*". It also considered that "*...the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the [2023] LVA to overlook smaller-scale variations in effects that could be meaningful at a local level.*"

5.2 The 2024 LVA improved its technical reliability in relation to the ZTV, seasonal photography, additional viewpoints and (townscape) character areas. However, queries remained over the judgmental aspects of its methodology, particularly in relation to representative and perceptual landscape attributes, landscape value and receptor sensitivity. The reliability of the 2024 LVA in relation to the relevant parameter plan at that time was also questioned.

5.3 The 2025 LVA has resolved the concern about its relationship to the latest (December 2024) parameter plan. However, no explicit response has been made to most of the concerns remaining from the Second LVA Review. This should be noted by the Parish Council, and by district councillors when they come to determine the application.

Implications for Separation between Houghton + Wyton and St. Ives

5.4 The June 2023 report for the Parish Council titled "*Implications for Separation between Houghton and St. Ives*" concluded the following:

- *The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road.*
- *The majority of the site retains a greenfield character that reinforces its role as part of the open countryside.*
- *Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).*
- *The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road.*

- *This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.*

- *The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires.*

- *This openness is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.*

- *Although development would occupy only c22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road.*

- *As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.*

- *The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west.*

- *The visualizations in the 2023 LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.*

- *The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins.*

- *This is clearly contrary to NP Policy 3, and is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.*

- *The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b)[2].*

- *The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.*

[2] Now NPPF187(b)

5.5 The Second (October 2024) LVA Review considered those conclusions to remain fundamentally valid. The 2024 LVA made no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives. However, it did assess the development's impact on the St. Ives urban character areas (CAs), specifically the Western Periphery CA, in which the site is located. This approach is carried over into the January 2025 LVA.

5.6 As its name suggests, this CA forms the western fringe of the town, comprising a combination of built-up areas (Garnier Drive and The Spires), mature tree belts and open grassland. The area's association with the Great Ouse Valley, the Thicket Path and the Houghton and Wyton conservation area is acknowledged in the LVA to be of "increased local value".

5.7 The Western Periphery CA is considered in the LVA to be of Medium value and Low susceptibility, giving rise to Medium sensitivity [Ref LVA Table 6.2.1-1]. The proposed development is considered in the LVA to amount to a Low magnitude of change, which in combination with Medium sensitivity gives rise to a Minor Adverse effect at Year 1.

5.8 In my opinion, the predicted Minor Adverse effect under-states both the susceptibility to change of the residual green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. This encroachment is described in the LVA [ref 9.1.2.1] as a "slight alteration to a limited part of the CA". Whilst this may be the case spatially, it is unlikely to be the experience perceptually.

5.9 The LVA also refers to the retention of a "green wedge of open space" between the development and The Spires [same para ref]. However, as pointed out in the conclusion to the original LVA review, the width of the east/west green gap between Houghton & Wyton and St. Ives (which falls within this CA) would be reduced by about two-thirds.

5.10 The peripheral and transitional character of the CA – and thereby its contribution to separation between the settlements – would be further eroded by the suburbanizing effect of the proposal. The residual green corridor to the east of the main development area would acquire a more visibly designed quality, including a play area and additional paths, with an increased level of recreational use.

[redacted]

From: DevelopmentControl
Sent: 24 April 2025 21:21
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 24/04/2025 9:20 PM from [redacted].

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	[redacted]

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Commenting upon what is now the 8th amendment to this application, we welcome the Locally Equipped Areas of Play (LEAP) being removed from the east of the developable footprint to protect the remaining countryside separation gap. However to simply show it on the Revised Parameter Plan as an 'informal play area' in the linear green space within the housing development rather than locally equipped area seems inadequate. Play is fundamental to children's physical health, wellbeing, social development, and cognitive growth, factors which were recognised in the recent amendment to the National Planning Policy Framework (NPPF), which now explicitly references 'formal play spaces' rather than simply 'informal' spaces and giving play spaces a higher priority in local planning decisions. Given the importance of such spaces and the fact that a second play area has featured in all the previous 7 versions of this application, it seems incongruous that a second LEAP, fully

equipped formal space, should not feature within the developable area.

Space of course does exist within the developable footprint if only the number of homes were reduced to that number allowable within the Local Plan. On paper the allocated site can contain a further 88 homes to complete the 400 earmarked in the Local Plan policy SI 1 for this area.

At present, Homes England are applying to build 120 houses which is 36% more than the Local Plan allocation. Even assuming it was acceptable to apply the +/- 10% tolerance in an upward direction, it would increase the house building on this site up to 97 so still freeing up space for a play area as well as the option to remodel and remove houses from the sensitive road entrance to the site. We estimate that doing this could also free up enough land within the development to provide space for a Multi Use Games Area (MUGA) or tennis courts, to relive much needed capacity for other sports and leisure activities currently located on the village playing field.

Houghton is classified as a small settlement. By attempting to incorporate an extra c32 houses, and when taken together with Houghton Grange phase 1, it would represent a 68% increase in the number of dwellings in Houghton itself. This would be a more significant expansion than was anticipated in the Local Plan with implications for the capacity of the community infrastructure, sports and leisure facilities the village can provide. Another reason not to over egg the numbers but to look to provide facilities for the whole village community within the developable area itself.

Of equal concern is the high density of this housing on the edge of a small settlement. At an average of 31.4 it would be twice the density of the Houghton Grange phase 1 development (16 dwellings per hectare (dph)) and sited right on the edge of the village as it abuts the countryside gap which our Neighbourhood and Loal Plan policies are designed to protect.

At 16 dph, Houghton Grange phase 1 is broadly consistent with the most densely developed areas of Houghton and lends itself to a countryside location. However, this application for Phase 2, at an average of c31 and c36 dph at its greatest concentration, is wholly inappropriate for both the village and its location.

This scale of density is also inconsistent with the recent Local Plan call for sites strategic land assessment criteria which had a cut off at 25 dph even for the edge of a town, let alone a small settlement when calculating capacity. More importantly, any development needs to be tailored to the local circumstances, for example, taking into account the existing densities which help shape and define the settlement, as well as any sensitivities of the area such as the fact that this development will be built within the last gap maintaining separation from the much larger Market Town.

However, even the Spires, which is on the outskirts of the town rather than small village settlement, and despite feeling intensively built out, actually has a much lower density at 25 dph.

Finally, we feel that by applying to build excessive numbers of homes on this remaining parcel is inappropriate and will result in planning harm. We therefore believe the very recent decision to reject the nearby Class C2 Residential Accommodation with Care at the junction of Harrison Way and Meadow Lane in St Ives (4/02275/FUL) is relevant. The decision to reject cites the reason that 'it would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area which has landscape and biodiversity value. Therefore, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP3, LP10, LP11 and LP12 of the Huntingdonshire's Local Plan to 2036 and the NPPF 2024.'

Therefore, in conclusion - reducing the numbers to fall back in line with NPPF, Local Plan and H&W Neighbourhood Plan policy leads to a far more acceptable solution, creating more space for play and leisure facilities, enhancing the perception of separation, complimenting Phase 1 and providing a more fitting density of housing for this countryside / small settlement location.

All of which would then be consistent with the alternative proposal which this council shared with Homes England and the District Council in July last year and which respects the individual and distinct identities of the village and town (Policy HWNP 3).

Kind regards

From: DevelopmentControl
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT
Date: 23 May 2025 13:37:49

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/05/2025 1:37 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	1. PLANNING MATTER 1.1. Outline planning (with all matters reserved except for means of site access) for the erection of up to 295 dwellings, provision of new roundabout access and secondary access, internal roads and footpaths, public open space and landscaping, surface water attenuation and associated infrastructure. Land East Of Houghton Hill Farm Houghton Road St Ives Ref. No: 25/00616/OUT RESOLVED: Houghton & Wyton Parish Council recommend this planning application be REFUSED and submit the following response: Housing situated at this location has been assessed and rejected in the past over many years for reasons of adverse impact on visual amenity, issues of sustainability, coalescence with surrounding settlements, loss of good quality agricultural land, and representing un-necessary building in the countryside. This latest application is contrary to current adopted planning policy and should be rejected for the following planning reasons: It is not supported by the Huntingdonshire Local Plan or NPPF - particularly policies LP2; LP7; LP10 and NPPF 116. LP10 a. seek to use land of a lower quality agricultural value in preference to land of higher quality value. i. Avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 - 3a) where possible The site is a Greenfield location situated in the countryside within Wyton on the Hill Parish. It would not contribute to reuse of previously developed land or regeneration. It would result in the loss of prime agricultural land. For sustainability assessment purposes, Natural England defines Best and Most Versatile land as grades 1 - 3a. This is picked up and made legal policy in LP10. Hence just as the policy and guidance both state, we should only be considering land for development which is below grade 3a and not capable of achieving any

higher.
The Planning Statement accompanying this application puts forward the applicants' assertion that there is no lower quality land available and due to triggering the 'tilted balance' they should be exempt from this policy restriction. However, this fails to consider a sequential test argument (in the same way as that used for land that is subject to flooding risk) whereby if there is land of a lower quality available, it should be this which is developed first.
We know that such lower quality land is available because substantial amounts have already been put forward for development through the district's new Local Plan Call for sites and Land Availability Assessment which the council has conducted. Some of what has been offered and already assessed as suitable for development is also previously developed land.
Huntingdonshire benefits from the fact of having some of the very best quality and most precious agricultural land in the UK, which LP10 crucially looks to protect. The applicant admits that this only constitutes 78% of Huntingdonshire's total land mass which therefore still leaves 22%, or over one fifth of the entire District, below that level set by Natural England and LP10.
NPPF 116
Development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all future reasonable scenarios.[emphasis added]
We recognise that there are questions over the reliability of some of the data used for modelling the capacity assessments from this proposal, but even with these limitations, the applicant reports in their Planning Statement 6.57 that the queue increases at the A1123/Garner Drive Signalised Crossroads would be considered 'severe'. [emphasis added].
This does correspond with previous studies. As far back as 2011, Cambridgeshire County Council stated that based on background growth, the A1123 would be over capacity by 2017.
Pollution levels particularly from queuing vehicles at peak times most mornings and evenings on Houghton Hill have been the source of serious complaints to the Council and such a development would only exacerbate this.
At the Local Plan Hearing in 2018 for the current Local Plan - Matters 8, CCC stated that the highways modelling work had already highlighted significant impacts from housing situated west of St Ives. They had assessed 15 junctions and found that no less than 8 were anticipated to operate over capacity in the future year scenarios and that traffic generated from such a development would require strategic solutions to the road network for projected traffic flows to be acceptable.
1) The B1090/A1123 Houghton Road/Houghton Hill Road junction; 2) A1123 Houghton Road/Garner Drive signalled junction; 3) A1123 Houghton Road/Hill Rise/High Leys signalled junction; 4) A1123 Houghton Road/Ramsey Road/St Audrey Lane signalled junction; 5) A1123 St Audrey Lane/Somersham Road roundabout; 6) Stocksbridge Lane/Harrison Way roundabout; 7) B1514/The Avenue signal junction;
The latest Amended Traffic Assessment submitted as part of the Houghton Grange Phase II application 23/00627/OUT concludes that by 2028, even without Phase II going ahead the Houghton Road/Garner Drive/Houghton Grange Site Access junction is forecast to operate above capacity in 2028 in both the AM and PM peak hours. Likewise by 2033 the Houghton Road/Hill Rise/ High Leys Junction is also calculated to be over capacity.
We note that the current A141 & St Ives improvement scheme is not considered to deliver any strategic solutions to traffic congestion problems in St Ives. Therefore we can only conclude that through NPPF116 development should be refused.
Furthermore, historic transport studies have all raised the point that St Ives has some of the highest levels of net outward commuting of any town in Cambridgeshire.
The strategic transport routes to and from St Ives run east (along the segregated guided bus route to Cambridge) and south east (towards the A14). Next busiest is the A1123 which takes traffic east/west through the town to link with these routes, hence a development of this scale situated to the west is on the wrong side of the town.
Likewise much has been made of the fact that the guided buses would run past the site entrance, however this is along the un-segregated road section and it is only upon reaching the other side of town, some three kilometres away, that the route emerges free of car traffic, hence once again west is not best.
In a bid to reduce net outward commuting, Employment Areas have been designated to encourage businesses to locate and employ more people locally. These are situated on the eastern side of St Ives and are set to expand further

east with Giffords Farm already being an allocated site for business and employment growth.
Therefore, another large-scale housing development on the western fringes, which puts the town in the way of people travelling to work, is not to be welcomed and will only contribute to the congestion already seen in the town.
LP7 Spatial Planning Areas
Residential Development
A proposal for housing development .... Will be supported where it is appropriately located within a built-up area of an identified Spatial Planning Area settlement. [emphasis added].
For reasons including those already mentioned, the proposed site is neither appropriately located nor within a built-up area of the Spatial Planning Area.
It abuts and overlooks the largest continuous conservation area in Huntingdonshire and valued landscape of the Great Ouse Valley.
The development would sit on the boundary of Houghton & Wyton Parish and join the newly developed village extension of Houghton Grange phase 1. At 295 houses this would represent a built mass equivalent to a third of the existing number in the village.
It occupies high ground towards the north eastern edge of Houghton & Wyton and the concentration of housing and with ridge heights of circa 10m on such a flat, open and exposed site, it would contribute significantly to the perception of and actual coalescence between town and Village, and so goes against policy HWNP 3.
A landscape assessment conducted this year and submitted as part of the outline planning application 23/00627/OUT for the Houghton Grange field site (BBSRC field), concluded that this location operated to form an important countryside extension to the gap maintaining separation of the two very different settlements of St Ives and the village of Houghton & Wyton.
Redevelopment of the Houghton Grange site for residential use is already changing the character of this area. Development of this site would alter the form of the local area further by introducing development on both sides of the A1123 and increasing the perception of coalescence of St Ives with Houghton and Wyton.
Housing and massing extending west along the A1123 would essentially constitute ribbon development of St Ives. This would be exacerbated by the fact that a portion of the western boundary adjoins Houghton Hill Industries hence with development of the site effectively making this contiguous with St Ives.
Development would affect the character of the local area by spreading the perception of the outskirts of St Ives along Sawtry Way and ultimately even the perception of linking with Wyton on the Hill.
Looking north, this large, concentrated mass of housing, begins to envelope the current softer edge of the town afforded by the recreation and sports grounds and creates an extended harder edge between Wyton on the Hill in open countryside and St Ives.
The site was offered for development again through the Local Plan Call for Sites last year. As part of the assessment for suitability to be taken forward, the question whether development can 'Make efficient use of land whilst also protecting the form and character of the local area?
The assessor answered this question stating that the 'majority of the land is surrounded by open space leisure uses or agricultural land; introducing built development would significantly impact on these by enclosing them into the built environment rather than the edge of settlement character they currently have'.
The proposal for 295 homes produces a density figure of 36 dph which would put the development into the 'Moderate' category of density as defined by the Supplementary Planning Guidance of the council. This is considered too high for an edge of town development, located a long way from the town centre. Were it to be developed, this settlement would form a buffer with very open countryside beyond and extending to Wyton on the Hill.
LP2 Distribution of Growth
Four Spatial Planning areas are designated reflecting their status as the district's traditional market towns and most sustainable centres.
This policy works in conjunction with LP7, the problems associated with which have been covered earlier.
Whilst development might relate well to modern housing on Garner Drive this only comprises a small element of the site's boundaries. The site relates poorly to Wyton on the Hill, Houghton & Wyton and St Ives in terms of position and sustainability. Experience shows that it would be difficult for this community to be embraced by the villages because the extremely busy A1123 already acts as a major impediment to those living north of it and it is isolated from the residential hub of Wyton on the Hill.

In relation to St Ives, the site is situated outside its built-up area and western boundary. It suffers from long distances to the town centre services. It is the opposite side of the town to the established employment areas as defined in the current Local Plan and the wrong side of town to access the principal transport routes and main direction of commuting.
The application is an unplanned, unsuitable extension of the town. It would constitute inappropriate building the countryside and result in the un-necessary loss of agricultural land (when other lower quality land is available), severely impact traffic flows in an area already suffering with roads/junctions over or nearing capacity; produce an overtly dense development contrary to guidance for a countryside edge of settlement, enclose open leisure areas within a built environment, and result in planning harm in terms of coalescence of settlements and loss of visual amenity.
1.2. Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works Land Between Houghton Grange And The How Houghton Road Houghton Ref. No: 23/00627/OUT
RESOLVED: Houghton & Wyton Parish Council recommend that this application be REFUSED and submit the following comments:
In response to the Revised Transport Assessment (April 2025) submitted by Homes England/AECOM, we would like to make the following comments:
LTP3 and the Houghton & Wyton Neighbourhood Plan Policies HWNP 12 and HWNP 13 all point towards refusing this application as it stands, and towards reconsidering it following a reduction to the excessive number of homes currently proposed.
LTP3 sets out the overarching transport strategy for Cambridgeshire and amongst other things looks to improve reliability of journey times and managing demand for road space; maximise the capacity of the network; and reducing the length of the commute and the need to travel by car
The Revised Transport Assessment submitted with the application shows that by 2028, even without this development, the Houghton Road/Garner Drive/Houghton Grange Site Access junction is forecast to operate above capacity in both the AM and PM peak hours.
Likewise, by 2033 the Houghton Road/Hill Rise/ High Leys Junction is also calculated to be over capacity.
This application already pushes the boundaries of excess by trying to build extra housing, over and above the residual allocation for this single piece of land without justification. Homes England are unjustifiably taking the entire St.Ives West site allocation target and increasing it by 10%, then adding it to the residual housing allocation number for this remaining field. The excess amounts to an additional 32 dwellings and whilst Homes England may make the argument that a little extra will not have a significant impact on the overall situation, which will already be problematic, by definition it will make things worse.
LTP3 suggests the excess could and should be removed from the equation to help manage the road space, reducing movements and thereby improving flows in and around the junctions.
The Houghton and Wyton Neighbourhood Development Plan 2018-2036 contains two policies relating to parking and access to the village centre by non-car modes.
Policy HWNP12: Parking to serve new development/ Houghton and Wyton village states that 'any proposals to provide additional public car parking to serve the village of Houghton and Wyton will be supported in principle.'
As it stands the policy does not support the application, but as we have already argued in comments we submitted on 24th April 2024 to the third consultation, removing the excess housing numbers would create space for additional recreational facilities such as a MUGA to be allocated on the site and which could include public parking.
The village and surrounding area is very popular with visitors, so provision of extra public parking spaces in this location would certainly ease pressure in the main part of the village and beyond.
Policy HWNP13: Access by non-car modes states that 'any development within the parish which creates additional movements will have to demonstrate that there is good access to the village centre on foot or by bicycle and/or that there is good access to an operational bus route. Where such access is lacking and there is a deliverable solution, new provision must be made towards addressing this.'
The Revised Transport Assessment makes assumptions about the mode of travel that residents will use and models a high percentage of movements by

non-motorised modes. However, we feel that these are excessive and that car usage levels will be greater than assumed.
We already have anecdotal evidence from existing residents of Houghton Grange Phase 1, that there is a tendency to use the car when visiting the village to participate in the social and recreational life of the village rather than to walk or cycle.
This is concerning but probably explicable when considering the Pedestrian and Cycle Isochrones reported in the Revised Transport Assessment. They show that there isn't particularly good access to the centre of the village which is beyond 15-20 minutes away by foot and 5-10 minutes by bike.
This is even more problematic when considering there is a hill involved in the return journey, pointing to the fact that the site is less sustainable than has been suggested, and that car use will be greater than modelled.
It is another reason why the site should not be considered suitable for additional housing numbers beyond those originally allocated within the Local Plan.

Kind regards

Laura Fisher
Senior Development Management Officer
Huntingdonshire District Council
Pathfinder House
St Marys Street
Huntingdon
PE29 3TN

Dear Laura

S106 Monies forthcoming from Houghton Grange Phase II 23/00627/OUT

In respect of 23/00627/OUT Houghton Grange Phase II and the S106 monies that will be forthcoming as part of any approval of this application, we were very pleased to have met with Robbie Bratchell, Strategic Sports Development Officer, and discussed the formula by which S106 monies are likely to be calculated for additional sports & recreation facilities. However, in doing so we realise that the brief handed down to us from this is lacking in a number of respects for what is likely to be a material sum of money which needs to be well spent.

Firstly, the timing of any monies from this development need to be considered in the medium to long term. The S106 agreement signed for Phase 1 is nearly 10 years old and still a way off from triggering any payment. We have consulted the sports clubs locally and it is clear that as things stand, their own needs if they have them are mainly short term, related to replacement equipment rather than growth, and relatively small scale. They are also of a type that could be grant assisted in other ways than through S106.

The issue stems from the fact that the clubs are based on the one existing playing field we have in the village and constrained by its space and current use which is near to or at capacity. We are concerned that Phase I and Phase II are delivering very significant growth to our overall population (up to 25%) as well as changing the demographics of the village. Consulting residents on several occasions (most recently as part of starting a refresh of our Neighbourhood Plan), it is also clear that different local sports and recreation facilities are being demanded, but unfortunately cannot be accommodated by the Parish Council as land (and to some extent money) is simply not available.

We believe there may be some limited capacity for growth of existing and possibly new facilities if the use and layout of the playing field were professionally reviewed and facilities relayed, moved, or possibly replaced. To this end we discussed

obtaining some S106 monies to commission a professional study to investigate and recommend a more efficient use of our resources and ask that a sum for this is included within the S106 agreement.

We are also conscious that the very location of Houghton Grange, and especially that of Phase II, is now and will remain one of the most isolated parts of our village. It takes at least 20 minutes to walk to the existing playing field or centre of the village where most activities take place. Hence, we are very aware that to build a properly integrated community we need to locate some facilities within the developed footprint of the site itself.

Consequently, without prejudging the results of any survey, we have identified that our greatest need to accommodate the significant growth in the overall population of the village, and to meet the future changing demands of our society, is to secure community space/land within the Houghton Grange Phase II footprint. Space which can adapt to change and be used more flexibly such as through a Multi-Use Games Area (MUGA) or similar.

As we have commented through the various consultation exercises, we believe this is easily negotiable within the scope of the application from Homes England, which currently chooses to prioritise an excessive number and density of housing rather than the community infrastructure required for such an increase in village population.

We are therefore formally requesting an S106 agreement be secured which provides funds to improve the utilisation of existing parish land for sports and recreation provision, together with new land and infrastructure within the developed footprint of the Houghton Grange Phase II site to provide a new, flexible community sports and recreation facility.

We trust a more flexible brief can be agreed to provide more outdoor sporting/recreational opportunities for our growing community far beyond the present day.

Yours,

[redacted]
Clerk, Houghton & Wyton Parish Council

St Mary's Centre, Chapel Lane, Houghton, Huntingdon, Cambridgeshire, PE28 2AY
[redacted] [redacted] www.houghtonwytonpc.co.uk

VAT Registration Number 690 4004 55

[redacted]

St Mary's Centre, Chapel Lane, Houghton, Huntingdon, Cambridgeshire, PE28 2AY
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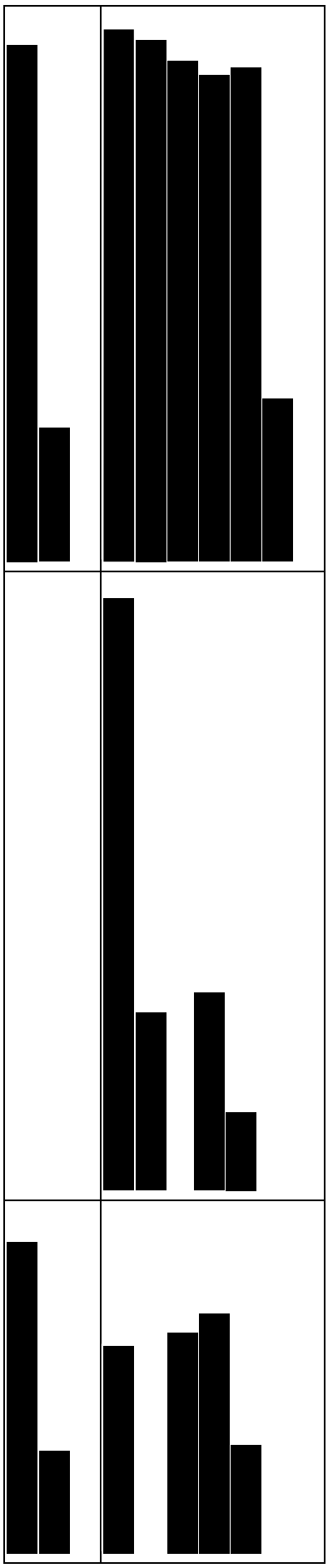
VAT Registration Number 690 4004 55

PLANNING APPLICATIONS

Official Responses from Planning Committee Meeting 24 May 2023

Application No Applicant/Agent	Proposed Development	Comments
[redacted]	[redacted]	[redacted]lready refused the application.
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

[redacted]	[redacted]	[redacted]
23/00627/OUT Homes England Mr Jonathan Hill AECOM Aldgate Tower 8th Floor 2 Leman Street London E1 8F	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. **Land Between Houghton Grange And The How Houghton Road, Houghton** **St Ives**	**Extension Request** – the committee feels that more research is required into the proposed development due to the history and nature of the plot, as well as the potential effects of the proposed works on the area. The committee wishes to address the planning application at a future meeting.
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

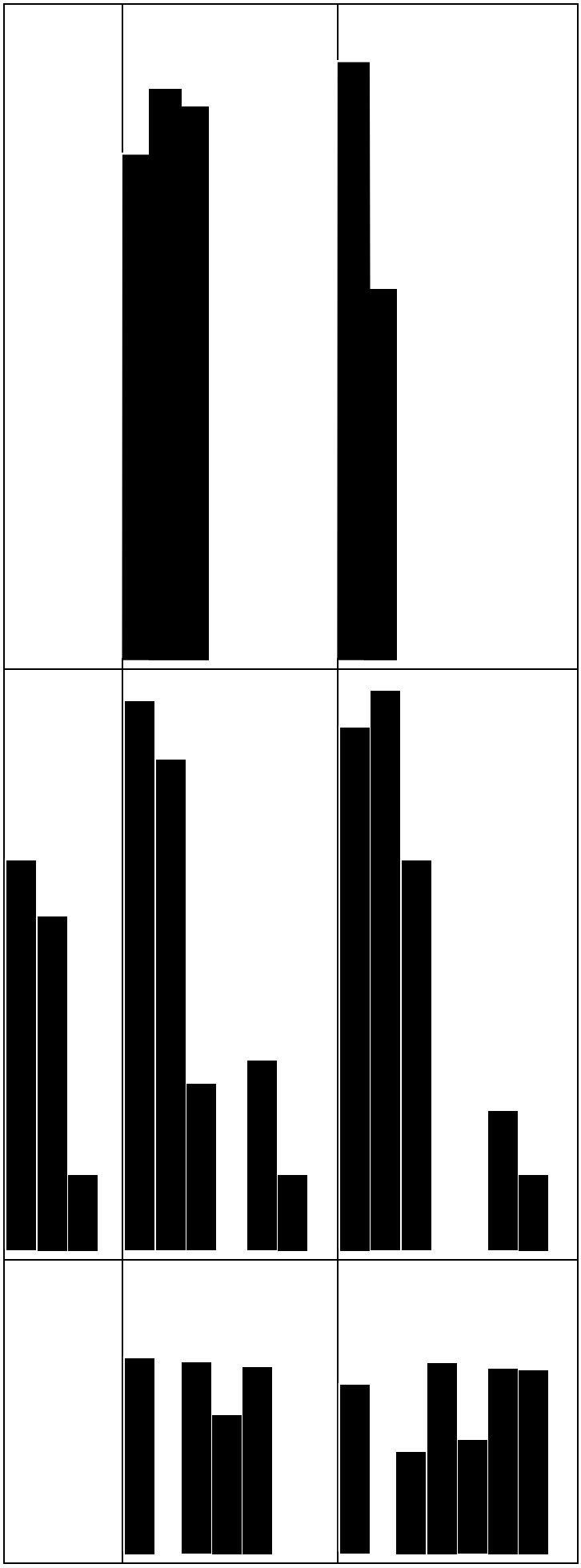


PLANNING APPLICATIONS

Official Recommendations from Planning Committee Meeting 28 June 2023

Application No Applicant/Agent	Proposed Development	Comments
23/00627/OUT Homes England Mr Jonathan Hill AECOM Aldgate Tower AECOM 8th Floor 2 Leman Street London E1 8F	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. **Land Between Houghton Grange And The How Houghton Road, Houghton** **St Ives**	**Refusal** – the proposed layout and density of the buildings will eliminate the green entrance to St Ives; as well as impede natural animal migration. The development area size is bigger than that shown in the current Local Plan vision of the area. In particular the north end of the development is too close to the A1123 thus impacting the green space and vista from the road. There should be a gap as big as that between the Spires estate and the road. The number of houses (120) is the maximum permitted for the area. St Ives town council would prefer the number to be much less and at or close to the minimum number within the permitted range (56 houses). The design of houses should be similar to that in phase 1 of the development and not a smaller more cramped town style development. The Town council note and agree with the concerns from Anglian Water re the drainage from the site and with those from the County Council re the traffic implications. The former should have been dealt with before the application was made. There appears to be no provision for Active Travel connectivity with Houghton village and through to Huntingdon.

		Feedback from the SITC and local residents was very much in opposition to the proposed development in its current format and general consensus was that many changes were required for it to be acceptable.
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]



From: DevelopmentControl
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT
Date: 14 October 2024 13:25:04

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 14/10/2024 1:24 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	St. Ives Town Hall Market Hill ST. IVES

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Members were unhappy about the brevity of the consultation period for town and parish council feedback. While noting the minor changes to the configuration of properties within the proposed plan, members felt that previous concerns about the number and density of properties being proposed had not been addressed. The number of properties still exceeds HDC's requirements for the area. The density of 28 properties per hectare far exceeds those for Houghton Grange phase 1 (16 properties per hectare) and it also exceeds that for the Spires development in St Ives (26 properties per hectare). There is no perceived justification for the high density of this application. There was also concern of the impact the development would have on local amenities, including schools. In light of the recent flooding, members reiterated concerns that the developer had not specified the surface water drainage solution to be used at the site. Also that the more homes that are built on the site, the greater the flood risk from surface water could be.

Kind regards

[redacted]

From: DevelopmentControl
Sent: 13 March 2025 13:05
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 13/03/2025 1:04 PM from [redacted].

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	[redacted]

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	St. Ives Town Hall Market Hill ST. IVES

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer made comments neither objecting to or supporting the Planning Application
Reasons for comment:	
Comments:	St Ives Town Council welcomes the increased green space in the north side of the development, however it was noted that this is compensated by the play area being moved to the east side. Councillors are looking for the impact to be minimal in terms of the open space between the development and St Ives.

Kind regards

[redacted]

Subject: Planning Application 23/00627/OUT - St Ives Town Council comments
Date: 15 May 2025 11:59:14
Attachments: image001.png
Importance: High

Good morning,

I have just submitted our Planning Committee's comments on the HDC portal regarding Planning Application 23/00627/OUT (Land Between Houghton Grange and The How), but after hitting the submit button it came up with a Server Error message.

I wanted to ensure you have the Town Council's view on the application. I have included their comments below.
Please can you confirm receipt?

St Ives Town Council recommends objection to the application, which was unanimous. Members noted that the Local Plan allocated 88 homes, plus or minus ten percent. The application's plan exceeds this number, and the Committee strongly feels that a figure of minus ten percent would be more appropriate for the area (79 homes). Councillors shared local residents' views on the application, noting that many objections have been made by the public.

The Committee expressed concerns on grounds of overdevelopment and a significant strain on local infrastructure and resources. Traffic and congestion issues are a major concern for the Council and local residents. The existing traffic figures and congestion levels on Houghton Road are already very high. This would only increase further with the proposed application.

Additionally, the proposed density of 25dph for the development is not suitable for the edge of a town which cannot sustain a central town density. The application would also eliminate a significant amount of the green space between St Ives and Houghton.

[redacted]

Democratic Officer

St Ives Town Council

Town Hall, Market Hill, St Ives, Cambridgeshire PE27 5AL

[redacted]

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Laura Fisher

From: DevelopmentControl
Sent: 16 May 2023 12:16
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 16/05/2023 12:15 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	30 West Drive, Highfields Caldecote, Caldecote, Cambridgeshire CB23 7NY

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer made comments in support of the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council approve - It has met the Parish Council's concerns initially raised on impact from development on Hemingford Grey.

Kind regards

From: DevelopmentControl
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT
Date: 15 October 2024 13:23:57

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 15/10/2024 1:23 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	[redacted]

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council object to the application: The Parish Council has confirmed that the amount of trees had decreased in the application. Drainage, sewerage and traffic are all severe issues in Hemingford Grey. The Parish Council has concerns about how it will be not possible to manage the drainage and sewerage requirements and the implications to the surrounding area which is designed as a Flood Plain in the Local Plan. This is also exacerbated by the reduction in tree numbers and increased building density. The Council has further concerns about the increased traffic on the A1123, which is already overcapacity. Hemingford Grey Parish Council believes that separation of Towns and Villages is important and this application would further degrade the buffer between Houghton and St Ives Town. The density of development is far higher than the surrounding area and would need significantly decreasing to be acceptable.

Kind regards

From: DevelopmentControl
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT
Date: 28 February 2025 13:41:48

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 28/02/2025 1:41 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	[redacted]

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council objects due to overdevelopment of the site, the development overrules the local plan for Houghton and Wyton, places too much strain on all the local services, the roads and destroys the historic nature of this village to becoming a suburb of St Ives. It would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.

Kind regards

[redacted]

From: DevelopmentControl
Sent: 22 April 2025 15:30
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/04/2025 3:29 PM from [redacted]

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	[redacted]

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	30 West Drive Highfields Caldecote Caldecote Cambridgeshire

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council noted that the amendments did not seem to be significantly different from previous applications, to respond that having reviewed the amendments, the Parish Council still objects to the application, and to reiterate its previous comments: Hemingford Grey Parish Council objects due to overdevelopment of the site, the development overrules the local plan for Houghton and Wyton, places too much strain on all the local services, the roads and destroys the historic nature of this village to becoming a suburb of St Ives. It would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.

Kind regards

For the attention of Laura Fisher

Dear Laura

Please find below Hemingford Abbots Parish Council's response to the following planning application:

23/00627/OUT – Land between Houghton Grange and The How, Houghton Grange, Houghton

- Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works.

RESOLVED to recommend refusal of this outline planning application as the development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal. This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish.

Kindly update the planning portal with our recommendations.

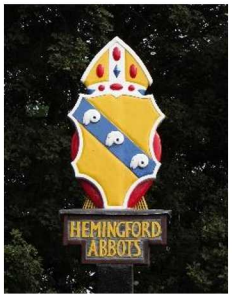
Thank you

[redacted]

Parish Clerk/RFO

Hemingford Abbots Parish Council

Emailed to HDC 30/5/23



HDC Planning Department,
Huntingdon District Council,
Pathfinder House,
St Mary's Street,
Huntingdon,

22nd October 2024.

Dear Sir / Madam,

Ref: 23/00627/OUT

Hemingford Abbots Parish Council is writing to express our strong objection to the latest Houghton Grange Phase II Development Proposal (planning application for up to 120 homes Use Class C3).

Although this application is not located in Hemingford Abbots, it is only one mile from our parish boundary - and we are sufficiently concerned about the testing of several important planning principles that we resolved to share our thoughts in writing ahead of any decision being made.

Our anxieties can be summarised as follows:

1) There are reportedly over 130 documents listed on your website related to this planning application: whilst we understand that the necessary 21 days' period was offered to statutory consultees, we were alarmed to hear that only 14 days has been granted to other interested parties. In our opinion, this is insufficient time to allow a layperson to properly consider such what is an unusually large quantity of technical and complex documents. The unnecessarily short consultation period therefore sets an unwelcome precedent, and does not promote support for local democracy.

2) We understand that the latest version of the application (120 homes) is in contradiction to the local and relevant Neighbourhood Plans. We would like to ask: what the point is of seeking agreement with a local population regarding acceptable and sustainable development if this is to be over-ridden and ignored? We believe that the high density of this phase (28 houses per hectare) ignores the anti-coalescence policy, and introduces unnecessary risks to local amenity and tourism. At the very least, the housing density should be feathered at the edges of the development.

3) Hemingford Abbots Parish Council previously submitted our concerns regarding this development in July 2023 as follows:

"Hemingford Abbots Parish Council recommends refusal as the development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on HDC portal as a reason for refusal.
This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish."

These opinions remain relevant today and in particular, the potential overflow of surface water into the river has yet to be addressed by any of the parties involved.

We also request that a full and proper assessment is made with respect to the capacity of the drainage and irrigation systems for the wider site, because much of the infrastructure in the surrounding area is potentially obsolescent and prone to failure.

Yours faithfully,

[redacted]

Parish Clerk
for and on behalf of Hemingford Abbots Parish Council

Laura Fisher

From: [redacted]
Sent: 29 April 2025 17:07
To: DMAdmin; Control, Development (Planning)
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Importance: High

Dear Team

Please see below HAPC's comments in relation to the planning consultation on the Land Between Houghton Grange and The How, Houghton Road, Houghton:

Resolved to recommend refusal of this planning application for the same reasons HAPC gave at the original application stage, these are:

The development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal. This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish.

I would be grateful if you would add our comments to the planning portal and let me know when this has been done – thank you.

Kindest regards

[redacted] Parish Clerk
Hemingford Abbots Parish Council | 18 Church Street | Hemingford Grey | PE28 9DF

[redacted]
Website: www.hemingfordabbots.org.uk

Please note my days of work vary and I may not be able to respond to your email immediately.

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From: Dmadmin@huntingdonshire.gov.uk <Dmadmin@huntingdonshire.gov.uk>
Sent: 04 April 2025 11:24
To: [redacted]
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Dear Parish Clerk,

Please find correspondence from Development Management at Huntingdonshire District Council

attached to this email in relation to the following application for planning permission.

Proposal: Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

Site Address: Land Between Houghton Grange And The How Houghton Road Houghton

Reference: 23/00627/OUT

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Development Management
Huntingdonshire District Council

T: 01480 388388
E: dmadmin@huntingdonshire.gov.uk

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Laura Fisher

From: DevelopmentControl
Sent: 25 June 2023 11:01
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Categories: [redacted]

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/06/2023 11:00 AM from [redacted].

Application Summary

Address:	Land Between Houghton Grange And The How Houghton Road Houghton
Proposal:	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works
Case Officer:	Laura Fisher

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	2 Anderson Drive, St Ives PE27 6AF

Comments Details

Commenter Type:	Officer of the Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	My comments are on behalf of Wyton on the Hill Parish Council as discussed at their parish meeting on 8th June 2023. We do not object to building on this land but it needs to be proportionate and given proper attention which we feel this application does not. We believe that this application has not followed the local plan in any way.

Transportation will be an issue with an increase of the flow of traffic past our estate, into St Ives and passing Houghton and Wyton villages.

Their will be increased flooding risks and drainage problems which will in turn have knock on effects in our parish.

The integration of settlements is not what we would like to see.

It will weaken future attempts at anti coalescence.

The valued landscape would be devalued.

Kind regards

From: [redacted]
To: DMAdmin
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)
Date: 14 October 2024 08:43:36

Thank you for your email. This was discussed at our Parish Council meeting last Thursday (10th October) and the councillors have the following comments:

Your email has been the first time we have heard of this – we are very close neighbours and the impact on our parish will be huge.

- The amount of time given (2 weeks) is unacceptable for a council to make a decision on this item. All our councillors work full time and find it unreasonable to be able to read 131 documents in that timescale. We request that we have more time to comment and will discuss again at our next meeting on Tuesday 12th November 2024.

- How large will the gap be between Houghton and St Ives – will there even be a substantial gap at all?

- The impact on flooding will be horrendous. Wyton on the Hill itself flooded in December 2020. More housing in such a close proximity to Houghton and Wyton would impact the amount of emergency services that could potentially attend to Wyton on the Hill.

- The increase in traffic on an already over used road.

The above are just a few comments from councillors as explained. We request the District Council gives more time for us to properly read the information given and make our comments.

Kind regards,

[redacted]

Parish Clerk and Responsible Finance Officer
Wyton on the Hill Parish Council

[redacted]

[redacted]

Please note I only work 7.5 hours a week so you may not get an immediate response to any email sent.

From: Dmadmin@huntingdonshire.gov.uk <Dmadmin@huntingdonshire.gov.uk>
Sent: 01 October 2024 16:38
To: [redacted]
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Dear Parish Clerk,

Please find correspondence from Development Management at Huntingdonshire District Council attached to this email in relation to the following application for planning permission.

Proposal: Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

Site Address: Land Between Houghton Grange And The How Houghton Road Houghton

Reference: 23/00627/OUT

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If you have any doubts or concerns relating to this email please contact us directly, our contact details are provided below.

Development Management
Huntingdonshire District Council

T: 01480 388388
E: dmadmin@huntingdonshire.gov.uk

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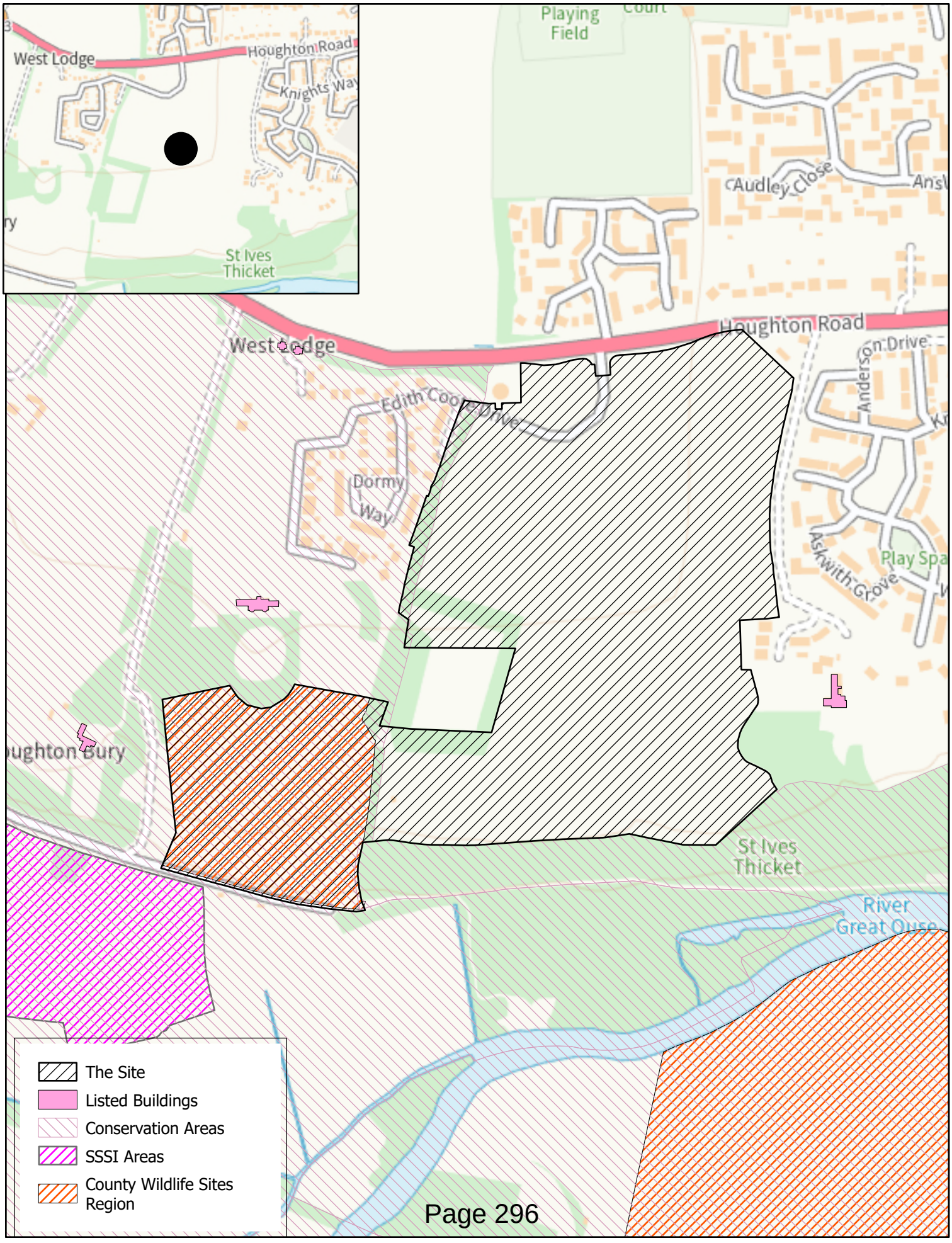
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Development Management Committee
Application Ref: 23/00627/OUT

Scale = 1:5,000
Date Created: 04/07/2025

Huntingdonshire DISTRICT COUNCIL

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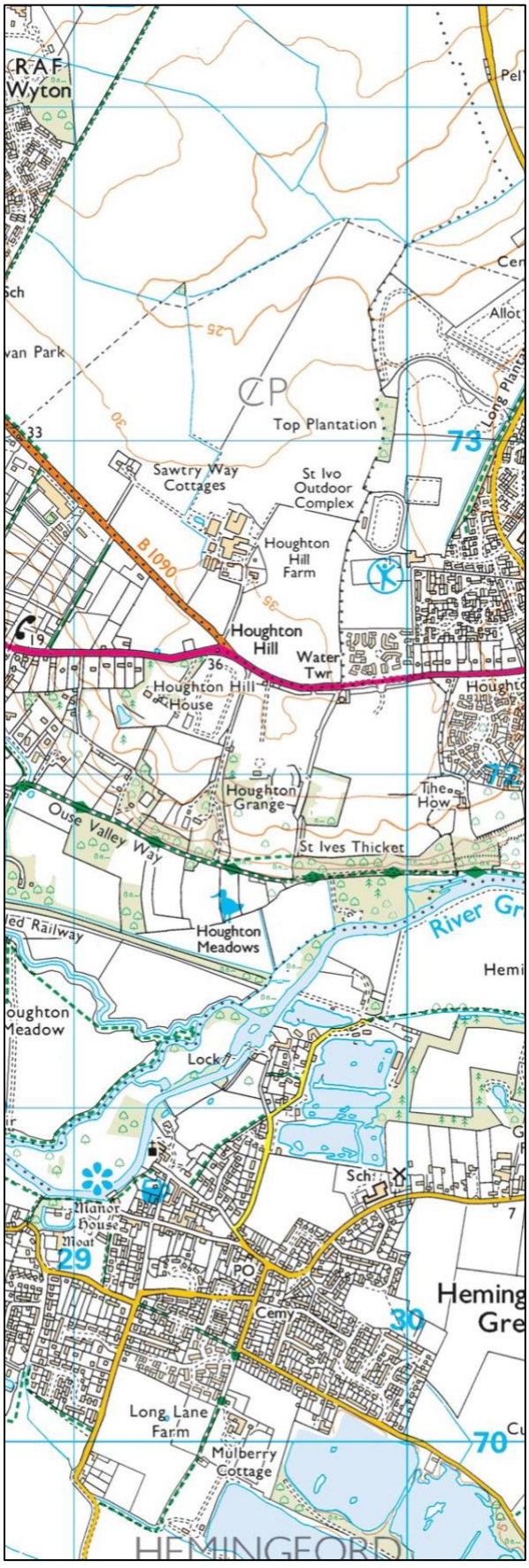
Development Management Committee
Application Ref: 23/00627/OUT

Scale = 1:5,000
Date Created: 04/07/2025

Huntingdonshire DISTRICT COUNCIL

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MICHELLE BOLGER
Expert Landscape Consultancy

Land off Houghton Road, Houghton

Review of
2025 Revision of Planning Application

Prepared for
Huntingdonshire District Council

Application Ref
23/00627/OUT

June 2025

Prepared by:	[redacted]
Position:	**Director**
Qualifications:	FLI, Dip. LA, BA (Hons) LA, PGCE, BA (Hons) Eng
File name:	1273 Houghton Grange 2025 Revison Final .docx
Date issued:	June 2025
Status:	

Executive Summary

1. This review by Michelle Bolger Expert Landscape Consultancy (MBELC) concerns the landscape and visual aspects of application 23/00627/OUT for up to 120 homes on land west of St Ives.

2. The site is located within the SI 1 Allocation from HDC's Local Plan (2019). Concerns have been raised by Houghton and Wyton Parish Council (PC) that the development proposed would result in coalescence between Houghton and Wyton and St Ives. I consider that the site already reads as being part of St Ives and this is reflected in the recent Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 (HDC SPD). The HDC SPD includes all of the SI 1 Allocation within the Western Periphery Character Area of St Ives.

3. The gap between St Ives and Houghton and Wyton is already experienced as the land between the Houghton Grange Phase 1 development, the most westerly part of the SI 1 Allocation, and the eastern edge of Houghton. This will not change when the proposed development is in place.

4. The LVA submitted with the application is adequate and has assisted in the assessment of the landscape and visual effects of the development. The methodical approach adopted in the LVA is acceptable although it does not always reflect best practice. Although there has been some underestimation of effects I agree with the overall conclusions of the LVA. I consider that the landscape and visual effects of the proposed development are unlikely to represent a reason to refuse the application.

5. Two previous reviews prepared by MBELC in April and November 2024 are attached to this review.

Introduction

7. In April 2024 Michelle Bolger Expert Landscape Consultancy (MBELC) prepared a review of an application 23/00627/OUT for up to 120 homes on land west of St Ives for Huntingdonshire District Council (HDC) (MBELC April 2024 Review). In September 2024 the Applicant submitted an amended application. MBELC reviewed the changes and prepared an updated review (MBELC Nov 2024 Review).

8. Since November 2024 a Revised Landscape and Visual Appraisal (LVA) dated January 2025 has been submitted as well as a Revised Illustrative Master Plan (Rev 4 dated 02/03/2025) and a revised Parameters Plan (Rev 09 dated 07/05/2025). Unless otherwise stated all references in this review are to the most recent LVA, Illustrative Masterplan or Parameters Plan. I do not repeat everything from the two earlier MBELC Reviews but make reference to where they set out in greater detail issues which are summarised in this Review.

9. HDC have instructed MBELC to review these latest documents. In addition HDC has asked MBELC to consider a *Review of the Landscape and Visual Appraisal* which Houghton and Wyton PC commissioned from Peter Radmall M.A., B.Phil, CMLI. The Review dated February 2025 (Peter Radmall 2025 Review) forms part of the objection to the application from Houghton and Wyton PC. A further visit was made to site on 24/06/25.

10. Peter Radmall had previously prepared a Review of the application in 2023 and at the same time a separate study entitled *Implications for Separation between Houghton and St Ives* (Peter Radmall Separation Study). Both these reports were considered when the MBELC April 2024 Review was prepared. Peter Radmall prepared a Second LVA Review in 2024. However, as the Peter Radmall 2025 Review summarises the contents of the previous reviews and identifies outstanding issues only the 2025 Review is referenced.

11. I have identified two main landscape issues raised by Peter Radmall on behalf of Houghton and Wyton PC which are:

    - The effect of the development on the separation between Houghton and Wyton and St Ives
    - Whether the methodology used in the LVA has resulted in inaccurate conclusions on landscape and visual harm.

Separation between Houghton and Wyton and St Ives

12. This is a key issue raised in the Houghton and Wyton Parish Council's (PC) objections and in the Peter Radmall Separation Study. It is addressed in detail in Section 2 of the MBELC April 2024 Review and summarised here.

13. The PC's concerns relate to Policy HWNP3 – Anti -coalescence in the Houghton and Wyton Neighbourhood Plan 2018 (NP) The Policy states that '*Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives.*' Text accompanying the Policy identifies the site as lying within '*land … separating Houghton and Wyton from St Ives*'.

14. HDC's Local Plan (Adopted May 2019) allocates the site as part of SI 1 St Ives West (Allocated Site SI 1). The policy states that '*Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications*.' It is stated that successful development of the site will require '*maintaining a sense of separation between developments at Houghton Grange and The Spires*' but there is no reference to this area forming the separation between St Ives and Houghton and Wyton. The diagram on page 197 identifies this area as 'open space'. The arrow 'to Houghton' is located to the west of the whole allocation.

15. In 2022 the Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022, (HDC SPD) was prepared. It identified the site and the whole of Allocated Site SI 1 as being located within the Western Periphery Character Area. The HDC SPD acknowledges that Allocated Site SI 1 lies within Houghton and Wyton parish but identifies Allocated Site SI 1 as now forming '*part of the St Ives Spatial Planning Area.*'[1]. There is no reference, either in the description or the recommendations for Development proposals, to Allocated Site SI 1 or the application site as forming part of the separation between St Ives and Houghton and Wyton.

16. The MBELC April 2024 Review identified this tension between the Houghton and Wyton NP and the HDC SPD. Principally that the Houghton and Wyton NP identifies the site and the Houghton Grange Phase 1 development as within Houghton and Wyton whereas the HDC SPD identifies them as part of the urban area of St Ives.

[1] Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Page 300 paragraph 7.63

17. The MBELC April 2024 Review included an assessment of whether the site did indeed provide separation between Houghton and Wyton, as identified in the Houghton and Wyton NP Policy HWNP3, or was really part of St Ives as identified in the HDC SPD. The conclusion I reached was that in terms of the current character Allocated Site SI 1 is part of St Ives. The factors on the ground that lead me to this conclusion are:

- The Slepe Meadow estate[2] extends the edge of St Ives westwards north of Houghton Road. It is located opposite the Application site and ends immediately before the Houghton Grange Phase 1 development begins, to the south of Houghton Road. The Slepe Meadow estate is clearly urban in character and part of St Ives.
- The access road for Houghton Grange Phase 1 is located opposite the access to the Slepe Meadow estate.
- Road widening and traffic signals at the access road for Houghton Grange Phase 1 contribute to the urban character.
- The Houghton Grange Phase 1 development is urban in character and relates to the Slepe Meadow estate.

18. When it was a research facility Haughton Grange was located in the countryside between St Ives and the village of Houghton and Wyton. However since 2018 there has been a significant change in character in this part of the landscape. Within Houghton Grange Phase 1 the change has been from a rural commercial/scientific facility to a residential development but beyond the Houghton Grange Phase 1 there have also been significant changes in the landscape between Houghton Grange and the edge of St Ives. These include the extension of St Ives westwards, the Slepe Meadow estate development, the Houghton Grange Phase 1 access road, road widening along Houghton Road and the introduction of traffic signals. There have been no significant changes in in the landscape between Houghton Grange and the edge of St Ives. As a consequence Houghton Grange Phase 1 now relates more clearly to St Ives. It is not perceived as part of the village of Houghton and Wyton nor an extension to the village as stated in the 28/02/25 objection letter from Houghton and Wyton PC. It is also not perceived as '*its own built up area*' as hoped for by the Houghton and Wyton NP[3].

[2] In the earlier MBELC reviews this was referred to as the Garner Drive development but I have since seen that it is mostly referred to as the Slepe Meadow estate so I have used that term in this review.
[3] Houghton and Wyton Neighbourhood Plan paragraph 5.19

19. My conclusions on this matter are very different to those reached in the Peter Radmall Separation Study 2023. It is primarily because of this difference of opinion on the central issue that we disagree on whether the LVA has adequately assessed the landscape and visual effects of the application.

20. The Allocation Site SI 1 includes both the western edge of the St Ives and the Houghton Grange facility. The policy requirement is to maintain '*a sense of separation between developments at Houghton Grange and The Spires*[4].' The Eastern Open Space proposed for the development will maintain a sense of separation between the Houghton Grange developments and The Spires, but this will not function as separation between St Ives and Houghton and Wyton as desired by Policy HWNP3 of the Houghton and Wyton NP. However, this is not as a result of the current development but because Houghton Grange Phase 1 already reads as part of St Ives for the reasons set out above. For the same reasons I consider that the proposed development will not harm the '*individual and distinct identities of the village of Houghton and Wyton and the town of St Ives*' as they are currently experienced.

[4] HDC Local Plan Page 195

Methodological Issues

21. The Peter Radmall reviews of the LVA raise a number of objections to the LVA methodology and the outstanding Issues are listed in the Peter Radmall 2025 Review Table 4~1: 2025 LVA Response to Remaining Concerns. I have addressed them in turn below.

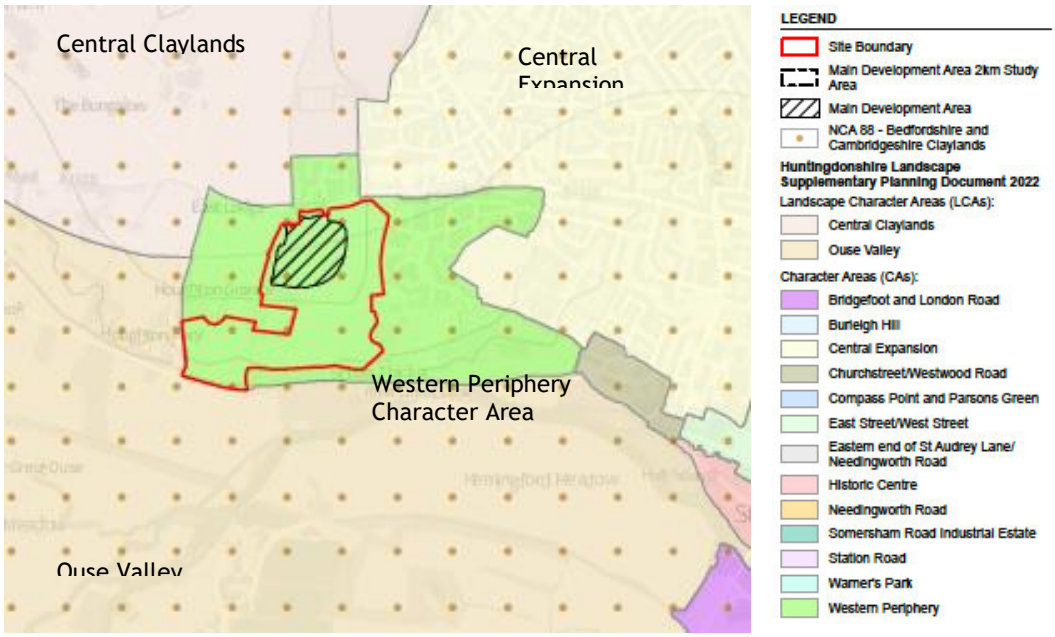
i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes – the 2025 LVA continues to subsume these attributes within the LVA focus on published LCAs and CAs.

22. It is important, as required by *Guidelines for Landscape and Visual Impact Assessment, 2013* (GLVIA), that all the components within a site and the landscape beyond it potentially affected by the development are considered in a LVIA, and a judgment reached on the effects of the development. However, GLVIA is not proscriptive that this should be done by identifying them all as landscape receptors with a judgement regarding the effect on each receptor. The latest LI Guidance Technical Guidance Note (TGN-2024-01) *Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessmen*t clarifies this. At 5 (2) it states that '*Landscape features, elements and characteristics that could be subject to change must be clearly described in their own right and could be treated as receptors if appropriate.'*

23. Some LVAs do identify the site and component parts as separate landscape receptors and assess each separately. However it is common for LVAs to limit the landscape receptors to LCAs that may be affected by the development. The identification of multiple landscape receptors can sometimes be unhelpful to the decision-maker who has to reach an overall conclusion on landscape harm. Personally I prefer to use a single landscape receptor '*the site and the immediate landscape*' with the '*immediate landscape'* being the area that influences the site and which has the potential to be affected by the development.

24. The Character Area in which the site is located in the HDC SPD, the Western Periphery, is small and includes all landscape that would be considered as '*the site and its immediately landscape'* as can be seen from LVA Figure 3. In fact the site's immediate landscape extends beyond the Western Periphery Character Area. For ease of refence I have included an extract from LVA Figure 3 below and annotated it

Plate 1 – Annotated extract from LVA Fig 3



25. The Western Periphery Character Area includes part of the Houghton and Wyton CA and a small part of the St Ives CA although only the former is mentioned in the description of the Western Periphery.[5] Most of the area of the Houghton and Wyton CA within the Western Periphery is occupied by the Houghton Grange Phase 1 development.

ii. The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed- the 2025 LVA makes no comment as the degree to which the site contributes or detracts from these areas, specifically in relation to the physical and perceived separation between St Ives and Houghton.

26. With regard to the identification of the contribution that the site makes to the published LCAs Table 6.2.1-1 Sensitivity of receptors does identify how the key characteristics of the LCAs/Character Areas influences their susceptibility. I agree with the conclusion of the LVA that the Great Ouse Valley LCA has high sensitivity to the proposed development and the Western Periphery Character Area has medium sensitivity.

27. As set out above I do not consider that the site contributes to the perceived separation between St Ives and Houghton and Wyton.

[5] Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Pages 300-301

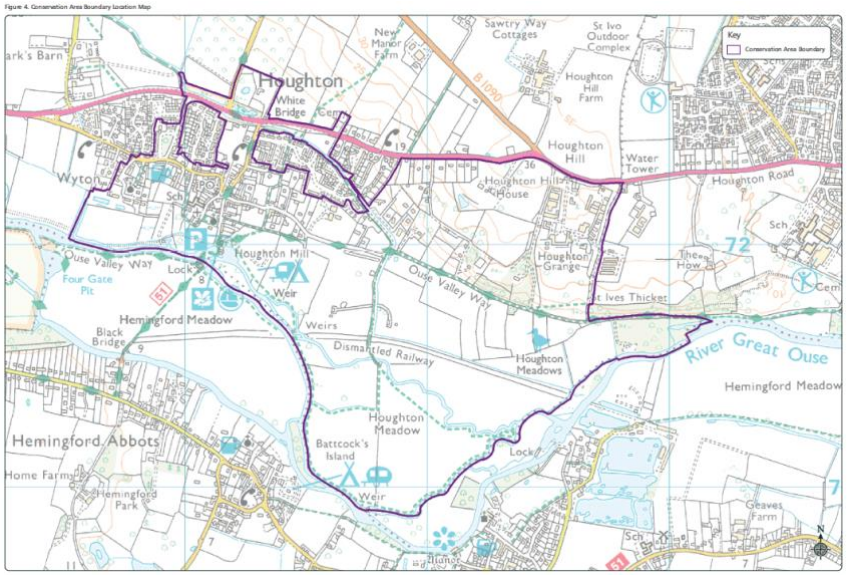
iii. Conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors – The conservation areas continued to not be identified as landscape receptors in the 2025 LVA.

28. With regard to the St Ives and Houghton and Wyton Conservation Areas (CA), they are considered within the LVA baseline assessment (e.g. 5.2.4.4 and 5.2.4.5). It would have been good practice to have mention them in the assessment of landscape value, e.g. the assessment of value for the Great Ouse Valley LCA in which they are both located. However, as the LVA assessment of landscape value for the Great Ouse Valley LCA is high it has not resulted in any underestimation of value.

29. In preparing this final review I have noticed that the extent of the Houghton and Wyton CA is shown incorrectly on LVA Figure 1. I have throughout my assessments been using the Houghton and Wyton CA Appraisal and I attach the plan from that document for reference.

Plate 2 – Figure 4 Conservation Boundary Location Map

from Houghton and Wyton Conservation Area Character Assessment October 2012



30. The Revised Cultural Heritage Desk Based Assessment December 2024 does identify the extent of the Houghton and Wyton CA accurately (paragraph 5.1), makes reference to the Character Areas identified in the 2012 Houghton and Wyton Conservation Area Character Assessment (paragraph 5.3) and undertakes an assessment of impacts on the CA and its setting (paragraphs 6.5 and 6.6).

31. HDC's Conservation Officer has assessed the impacts on the two CAs and concluded that any harm caused to the conservation areas and their settings will be less than substantial at the lower end of that scale.

iv. There was no explicit consideration of whether the site may form part of a valued landscape – The 2025 LVA does not include this consideration despite the Great Ouse Valley LCA being categorised as high value.

32. There is no explicit consideration of whether the site may form part of a valued landscape in the LVA. I agree with Peter Radmall that a Valued Landscape Assessment in accordance with current LI guidance (LI's TGN 02/21 *Assessing landscape value outside national designations* (2021)) would have been best practice. However, there is an assessment of landscape value for each of the LCAs/Character Areas which can be found in Section *5.2.3.2 Local Landscape Character*. The assessments make refence to distinctive features, natural and cultural heritage, physical condition, sense of identity, tranquillity and recreational use. This convers the main attributes recommended for consideration by TGN 2/21.

33. The LVA concludes that the Great Ouse Valley LCA has high value. I consider that this makes the LCA, or parts of it, likely to be a valued landscape. In 2023 the site was partly located within the Great Ouse Valley LCA. After the HDC SPD was adopted the site and the whole of Site Allocation SI 1 was removed from that LCA and now belong in the Western Periphery Character Area. I consider that the removal of Site Allocation SI 1 from the Great Ouse Valley LCA is indicative of the fact that this area is not likely to be considered a valued landscape.

34. I consider that the effects on the Great Ouse Valley LCA will be negligible due to existing screening and the distance between the area for development and the LCA. I do not therefore consider that whether the Great Ouse Valley LCA is a valued landscape or not makes a material difference to the landscape and visual effects of this application.

35. I consider that the landscape effects on the Western Periphery Character Area would be greater than the LVA concludes ((Medium adverse in Year 1 and Minor adverse by Year 15). However, I consider that this is within the usual margin of professional differences and do not consider that these landscape effects are likely to represent a reason to refuse the application.

v. **In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful - There have been no additional viewpoints included in the 2025 LVA.**

and

vi. **The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered – No additional viewpoints have been considered in the 2025 LVA.**

36. I consider that there are sufficient viewpoints and visualisations to be able to reach a conclusion as to the visual effects of the development. I agree with both the LVA and Peter Radmall that there will be a very noticeable visual change from Houghton Road. However, I do not consider that these visual changes will appear out of character or unacceptably intrusive because:

- I consider that the site is already perceived as being within St Ives, within the Western Periphery Character Area,
- The site faces the Slepe Meadow estate to the north of Houghton Road
- The access road to Houghton Grange Phase 1 runs though the site and
- The site is already influenced by the road widening and traffic lights associated with the SI 1 Allocation.

vii. **Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable.**

37. I agree with Peter Radmall that there is some inconsistency between the sensitivity ascribed to different receptors but I do not consider that this has resulted in a significant underestimation of the visual effects of the development which I do not consider are likely to represent a reason to refuse the application.

Other Matters Raised by Houghton and Wyton PC

38. The proposed development has been pulled back from the main road and I consider that this is an improvement over the original application. I do not consider that it is too close to the main road and, in combination with the Eastern Open Space, it should be possible to maintain an attractive green gateway to the town.

39. Most of the points in Sections 2 and 3 of the 28/02/25 objection letter from Houghton and Wyton PC are based on the assumption that the development is located in the gap between St Ives and Houghton and Wyton. For example that the proposed density would increase *'the perception of coalescence as it will look, feel and actually become views as an extension to the Spires and therefore to the town itself.'* (Section 3) I agree that the development will appear as an extension to St Ives but, as set out above, I consider that this is due to development that has already taken place rather than to the development proposed in this application.

40. Peter Radmall raised some issues with regard to the design of the eastern open space. The children' play area that was introduced in the December 2024 parameters plan has now been removed. It will be for HDC to approve the actual design of the eastern open space and I agree with others, such as Peter Radmall, that it should be kept as rural in character as possible. This is appropriate for its function to provide a green wedge in the urban fabric of St Ives, linking Houghton Road with the Ouse Valley open space. Only one of the routes through the eastern open space is proposed as a cycle and pedestrian route. It is therefore possible that other pedestrian routes can remain low key, e.g. mown grass paths.

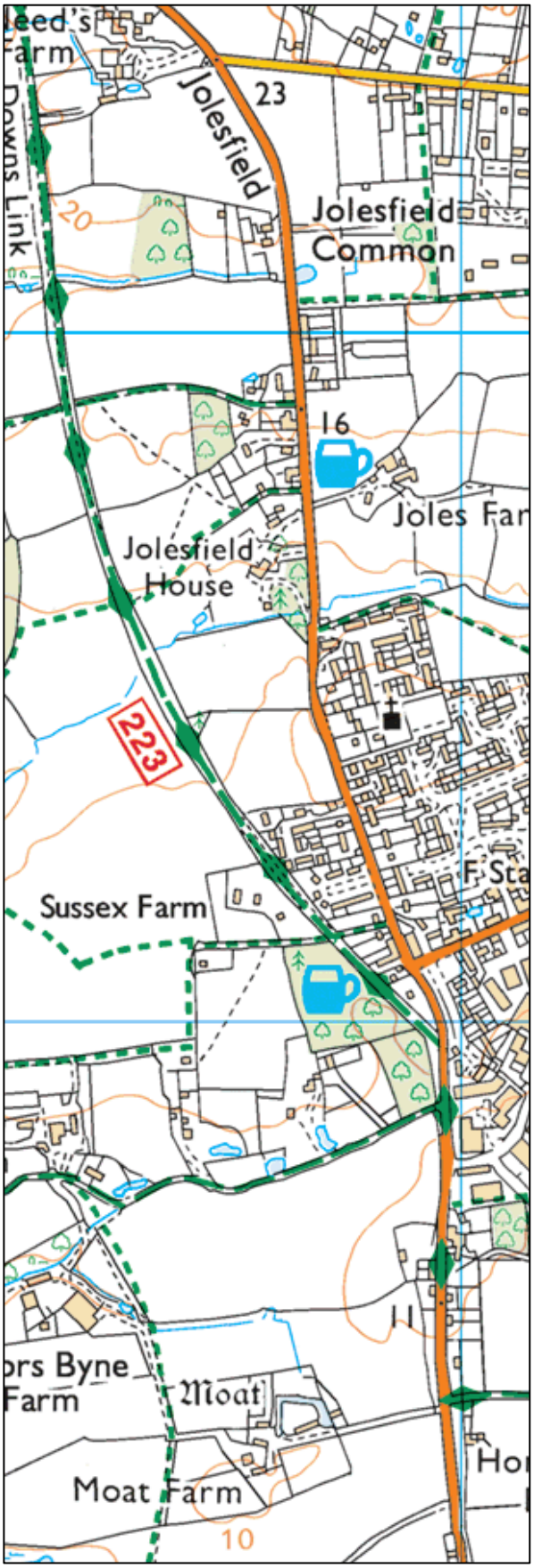


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Land off Houghton Road, Houghton

Review of
Planning Application

Prepared for
Huntingdonshire District Council

Application Ref
23/00627/OUT

April 2024

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Position:	**Director**
Qualifications:	FLI, Dip. LA, BA (Hons) LA, PGCE, BA (Hons) Eng
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APPENDICES

Appendix 1 Figures

Figure 1 Site location

Figure 2 Aerial Photograph & Existing Developments

Figure 2 Aerial Photograph & Proposals

Figure 4 Annotated Masterplan

Appendix 2 Figure 7.1 St Ives Character Areas from Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022

1 Introduction

1.1 Michelle Bolger Expert Landscape Consultancy (MBELC) has been instructed by Huntingdonshire District Council HDC to prepare a review of an application for up to 120 homes on land west of St Ives. The application is described by the applicant as Houghton Grange Phase 2 and as Houghton Grange Field, the review describes it as Houghton Grange Field.

1.2 The site is located within the St Ives West (SI 1) Allocation in the 2019 Local Plan. The allocation is described as follow:
54ha of land south of Houghton Road (A1123) to the west of St Ives, including land within the parish of Houghton and Wyton, is allocated for a mix of uses to comprise:

1. *approximately 23ha of green space*
2. *approximately 400 homes*
3. *social and community facilities to meet needs arising from the development*

1.3 The St Ives West Policy (SI 1) lists a number of requirements that successful development of the site will require which include: '*a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires*.'

1.4 Allocation site SI 1 includes three other developments as well as this application; The Spires to the east, The How to the east and south east, and Houghton Grange to the west (Figures 1 and 2). The current application forms part of the Houghton Grange developments.

1.5 Figures prepared to support this review can be found in Appendix 1.

1.6 The planning application was accompanied by a Landscape and Visual Appraisal (LVA) dated Feb 2023 (the original LVA) prepared by Aecom on behalf of Homes England. A revised LVA was issued in 2024. Although it has DRAFT on the title page it is assumed that it is the final version.

1.7 The Revised LVA was prepared in order to include winter photograph as the original LVA only included summer photography. In addition to the winter photography other significant changes are updates to reflect the HDC Landscape and Townscape Supplementary Planning Document (2022) and the inclusion of some more distant viewpoints as raised by a consultant on behalf of Houghton and Wyton Parish Council. NPPF references have also been updated but with regard to landscape matters there have been no substantive NPPF changes.

2 Separation between St Ives and Houghton and Wyton

Introduction

2.1 In my review of the application I have identified a key conflict in the various relevant documents. Houghton Grange (including the application site) is located within Houghton and Wyton parish. However, the conflict that has arisen is whether Houghton Grange (including the application site) still belongs to the village of Houghton and Wyton in terms of its character, or whether it is now more closely related to the town of St Ives.

2.2 The Houghton and Wyton Conservation Area (CA) includes the main part of what was the Houghton Grange research facility, but not the majority of the application site. At the time the CA was designated it is assumed that the research facility was still operational. By the time of the CA appraisal (2012) it was no longer operational. I am not aware of any subsequent amendments to the CA boundary following the grant of planning permission, the 2019 Local Plan allocation or the construction of Houghton Grange Phase 1.

Houghton and Wyton Neighbourhood Plan

2.3 Policy HWNP3 – Anti -coalescence in the Houghton and Wyton Neighbourhood Plan (NP) (2018) makes clear that historically 'the land … separating Houghton & Wyton from St.Ives has comprised that land extending east of Houghton Grange and being made up of the St.Ives Golf Course, BBSRC[1] Field and Thicket Wood.'[2] The BBSRC field is roughly equivalent to the application site. The NP considers that as a result of recent development 'the BBSRC field occupies the only undeveloped frontage adjoining the A1123'[3] and is therefore essential to '*ensuring anti coalescence'*[4]

[1] Biotechnology and Biological Sciences Research Council
[2] Houghton and Wyton Neighbourhood Plan Paragraph 5.5
[3] Houghton and Wyton Neighbourhood Plan Paragraph 5.9
[4] Houghton and Wyton Neighbourhood Plan Paragraph 5.28

2.4 The Houghton and Wyton NP acknowledges that there is a tension between the aim of preventing coalescence and the fact that 400 houses are allocated in the Core Strategy to the west of St Ives. The NP accepts that the Local Plan, which was emerging at the time the NP was written, would make the decision about where exactly they would be located. [5] As set out in section 1 above the BBSR field subsequently became part of allocated site SI 1 in the 2019 Local Plan.

Huntingdonshire Landscape and Townscape Supplementary Planning Document

2.5 In 2022 the Huntingdonshire Landscape and Townscape Supplementary Planning Document (HLT SPD) 2022 was adopted. This document which updated the earlier Huntingdonshire Landscape and Townscape SPD (2007)[6], was subject to public consultation between 15 October and 10 December 2021.[7]

2.6 Section 7 of the HLT SPD is The St Ives Spatial Planning Area. It is divided into 13 character areas and Character Area 11 is Western Periphery. This is shown on Figure 7.1 in the HLT SPD which has been included in Appendix 2 for ease of reference. This area extends westwards from the western edge of St Ives. North of Houghton Road it includes the Garner Drive development which was approved in 2007. South of Houghton Road it includes The Spires, and extends westwards to include all land between The Spires and Houghton Grange Phase 1. The site is located in the centre of the Western Periphery Character Area.

[5] Houghton and Wyton Neighbourhood Plan Paragraph 5.29
[6] Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Paragraph 1.8
[7] Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Document Information Page i

2.7 The HLT SPD acknowledges that allocation site SI 1 is within Houghton and Wyton parish but considers that it forms part of the St Ives Spatial Planning Area[8]. I agree with this conclusion on the basis of the current landscape townscape character. The reasons site SI 1 belongs in character terms to St Ives are:

- The Garner Drive development extends the edge of St Ives westwards north of Houghton Road. It ends immediately before the Houghton Grange Phase 1 development begins south of the road. The development is clearly urban in character and part of St Ives.
- The access road for Houghton Grange Phase 1 is located opposite the access to the Garner Drive development.
- Road widening and traffic signals at the access road for Houghton Grange Phase 1 contribute to the urban character.
- The Houghton Grange Phase 1 development is also urban in character due to its density but it does not suggest the start of Houghton and Wyton village or that it is a rural development.

2.8 Although the Houghton Grange Phase 1 access road currently appears to run through an open field it in fact reflects the location of built development on the application site which has since been demolished. Figure 4 shows the location of the demolished buildings in relation to the proposed development.

2.9 When it was a research facility Haughton Grange was located in the countryside between St Ives and the village of Houghton and Wyton. The employment use of the research facility, clearly non -residential, would have reinforced the fact that it was not part of St Ives. At the same time the Houghton and Wyton NP acknowledges that it is not part of the village '*This site is detached from the core village'* but hopes that *'when developed* (it) *will be large enough to create its own built up area*.'[9] I do not consider that this is what has actually happened.

[8] Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Paragraph 7.61
[9] Houghton and Wyton Neighbourhood Plan paragraph 5.19

2.10 The How development in addition to The Spires has brought the urban edge on the west side of St Ives closer to the Houghton Grange facility and there is also now a consistency of landuse (relatively dense residential development) where previously there was a mix of landuses including employment, agricultural use and golf course. In addition the access road to Houghton Grange Phase 1 is clearly urban in character and houses within Houghton Grange Phase 1 are visible. These are all factors that have increased the connection between Houghton Grange Phase 1 and St Ives.

2.11 These factors, compounded with the road widening, the traffic signals, and the Garner Drive development now tie Houghton Grange Phase 1 to the existing urban edge of St Ives as recognised in the HLT SPD. Houghton Grange Phase 1 is not perceived as part of the village of Houghton and Wyton, nor is it perceived as its own detached built up area as hoped for by the Houghton and Wyton NP.

2.12 To the west of Houghton Grange Phase 1 there is still a clear transition before the village proper begins. North of the road (within a different parish) there is open agricultural fields. To the south is parkland historically connected to Houghton Hill House (19th Century Grade II). A mature hedgerow with trees, and then an area of woodland which runs alongside Houghton Road, limit views into the parkland which, from aerial photographs, appears to be currently partly grassland and partly in arable use.

2.13 Beyond the grounds of Houghton Hill House are a number of large properties with large gardens set back from the road. Most have substantial planting in their front garden, generally of an ornamental character and the houses are only visible from the road through driveways. About 650m west of the western edge of Houghton Grange Phase 1 development becomes more suburban with the Hill Estate which is signed as the beginning of the village of Houghton and Wyton.

2.14 The historic centre of Houghton and Wyton is located approximately 1km from the western edge of Houghton Grange Phase 1. Figure 3 in the Houghton and Wyton Neighbourhood Plan, March 2018 includes Houghton Hill House and the large properties on Houghton Road with large gardens as part of the '*Core built up area of the village'*, with Houghton Grange considered as a separate area. However, I consider that Houghton Hill House and the large properties on Houghton Road are not perceived from Houghton Road as being part of the core built up area. Instead they are typical of large dispersed properties found on the periphery of a village .

Current conflicting intentions

2.15 The Allocation site SI 1 included both the western edge of the St Ives and the Houghton Grange facility. It includes a requirement to maintain a sense of separation between developments at Houghton Grange and The Spires, which then represented the westernmost edge of St Ives. However, it does not identify this as a sense of separation between St Ives and Houghton and Wyton The proposed development does maintain a sense of separation between the Houghton Grange developments and The Spires, but this will not function as a separation between St Ives and Houghton and Wyton as desired by Policy HWNP3 of the Houghton and Wyton NP. This is not as a result of the current development but because Houghton Grange Phase 1 already reads as part of St Ives for the reasons set out above.

2.16 It is a requirement of Houghton and Wyton NP HWNP3 that '*Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives*.' It goes on to correlate this with the physical separation of the two settlements. I consider that the development proposed will not further diminish the individual and distinct identities of the two settlements because Houghton Grange Phase 1 now has more in common with St Ives than with the open countryside or with Houghton and Wyton, and the distinct change in character between the two settlements now occurs west of Houghton Grange Phase 1. This will not change with the application proposals in place.

3 The proposed development

Set Back

3.1 The proposed development will be identified with the western edge of St Ives. Recent development on the south side of Houghton Road is already developing a specific character which this development should reflect. A key aspect of this is a generous set back from Houghton Road, to include the tree lined approach set out in Policy SI 1. Given the road widening and visibility splays for the access road I consider that the properties facing Houghton Road would benefit from being set back further from the road than is shown in the illustrative masterplan.

Separation from the Spires

3.2 Development in The How now extends further west than development in The Spires. As set out above, I do not consider that the area of separation allowed for in the illustrative masterplan will be read as separation from Houghton and Wyton. However, I do consider that it will have a positive role to play in providing both physical and visual access from Houghton Road to the large area of accessible open space along the Great Ouse Valley which has been extended as part of previous developments and would be extended further as part of this this development. The separation has to be sufficient to allow a perception from Houghton Road that there is an open undeveloped landscape beyond. It should also create the sense of an entrance rather than appearing to be left over from the development.

3.3 The current existence of the access road allows an appreciation of the area of separation that will remain. The space that currently exists between the access road and the western edge of St Ives would be preferable to reduced space shown on the illustrative Masterplan. A key pinch point is between the south eastern corner of the development and the western extent of The How. Increasing this gap by pulling back the development in the south eastern corner would be desirable.

Revised Landscape and Visual Appraisal (LVA)

3.4 The assessment of landscape and visual effects in the Revised LVA is fair. The HLT SPD 2022 removed the site from the Great Ouse Valley LCA and assessed it instead as being within the St Ives Western Periphery. I assume this was a response to the site allocation but, even without the allocation, the part of the site proposed for built development is not representative of the Great Ouse Valley LCA. I agree with the LVA that there will be no significant adverse effects on the landscape character of the St Ives Western Periphery.

3.5 The southern part of the site which is proposed for accessible open space provides a good transition from the valued landscape of the Great Ouse Valley to the urban edge of St Ives. The proposed developed will be visible from this area, although currently will not be visible from areas with public access. I agree with the LVA assessment that there would be no change to the character of the Great Ouse Valley LCA.

3.6 There will be no clear visibility of the development from areas which are currently accessible to the south of the site. Viewpoint 5 in the LVA appears to be taken from beyond the northern edge of St Ives Thicket from a location not accessible to the public. From the accessible paths within the thicket visibility will be significantly more filtered.

3.7 Whilst the development will be clearly visible from Houghton Road (LVA Vp 6) it will read as part of the urban area defined by Garner Drive and Houghton Grange Phase 1. However, as the visualisation from Vp 6 indicates, restricting development east of the access road would help to maintain a greater sense of connection to the open landscape to the south.

3.8 I do not consider that there would be any significant views from the wider viewpoints which have been assessed in the Revised LVA.

4 Conclusion

4.1 The application site is within allocated site SI 1. It is the last of a series of developments within that allocation and is located on a field previously associated with the research facility at Houghton Grange . There are conflicting views on whether Houghton Grange belongs to Houghton and Wyton village (it is within the village CA), or to the new western periphery of St Ives (HLT SPD). I consider that the Houghton Grange site now reads as part of St Ives due to:

- The change in character to the Houghton Grange site as a result of the Houghton Grange Phase 1 development, including the access road across the application site ;
- The spread of development from the edge of St Ives on both sides of Houghton Road; and
- Road widening and associated traffic lights.

4.2 The Houghton and Wyton NP Policy HWNP3 seeks to retain the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. The NP considers that the field in which the application site is located makes a significant contribution to this separation. I consider that for the reasons given above the field no longer has a significant role in retaining the individual and distinct identities of the settlements and that the perception of a change in character now begins west of Houghton Grange Phase 1. I do not consider that the application proposals will affect the individual and distinct identities of the settlements.

4.3 The St Ives West (SI 1) allocation in the 2019 Local Plan requires that a sense of separation is maintained between developments at Houghton Grange and The Spires. This sense of separation is important in maintaining an appreciation of the open landscape of the Great Ouse Valley to the south from Houghton Road and providing attractive access to it. That sense of separation would be more clearer defined if the development did not extend as far to the east and if a pinch point with The How Development was relaxed.

4.4 The LVA provides a fair assessment of the landscape and visual effects of the development.

APPENDIX 1

Figures

FIGURE 1
Site Location

PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Huntingdonshire Local Plan Allocation SI 1 St Ives West
- Parish Boundary
- Location of LVIA Viewpoints 1-19

0 250 500 1000m

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FIGURE 2

Aerial Photograph & Existing Developments

PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Huntingdonshire Local Plan Allocation SI 1 St Ives West
- Public Footpath 132/10 (Ouse Walley Way)

Aerial Photograph: Google Maps, March 2024

Houghton Grange:
Landscape Structure Plan, M3130-PA-01-V06

The How:
Proposed Site Layout Plan,
437/18/FUL/PH1/PL1002 Rev. C

0 125 250 500m

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FIGURE 3

Aerial Photograph & Proposals

PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Huntingdonshire Local Plan Allocation SI 1 St Ives West
- Public Footpath 132/10 (Ouse Walley Way)

Aerial Photograph: Google Maps, March 2024

23/00627/OUT Site Masterplan:
Illustrative Masterplan, Rev 01, AECOM

Houghton Grange:
Landscape Structure Plan, M3130-PA-01-V06

The How:
Proposed Site Layout Plan,
437/18/FUL/PH1/PL1002 Rev. C

0 125 250 500m

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FIGURE 4

Annotated Masterplan

PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Location of original buildings, now removed
- Pinch point

23/00627/OUT Masterplan:
Illustrative Masterplan, Rev 01, AECOM

Location of original buildings:
Derived from Appendix A, Tree Constraints Plan, Rev P04, AECOM

0 50 100 200m

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APPENDIX 2

Figure 7.1 St Ives Character Areas
from
Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022

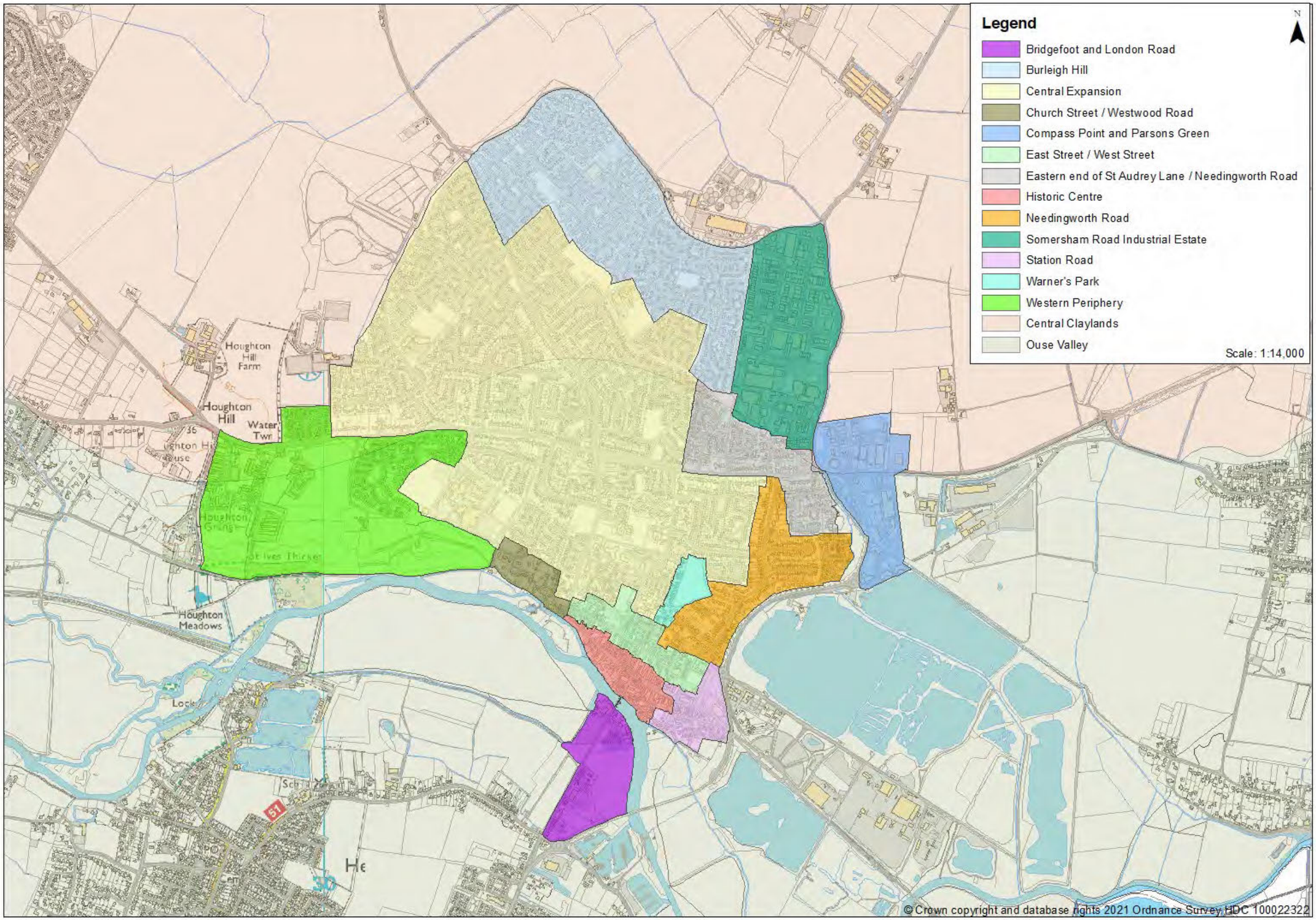


Figure 7.1 St Ives Character Areas

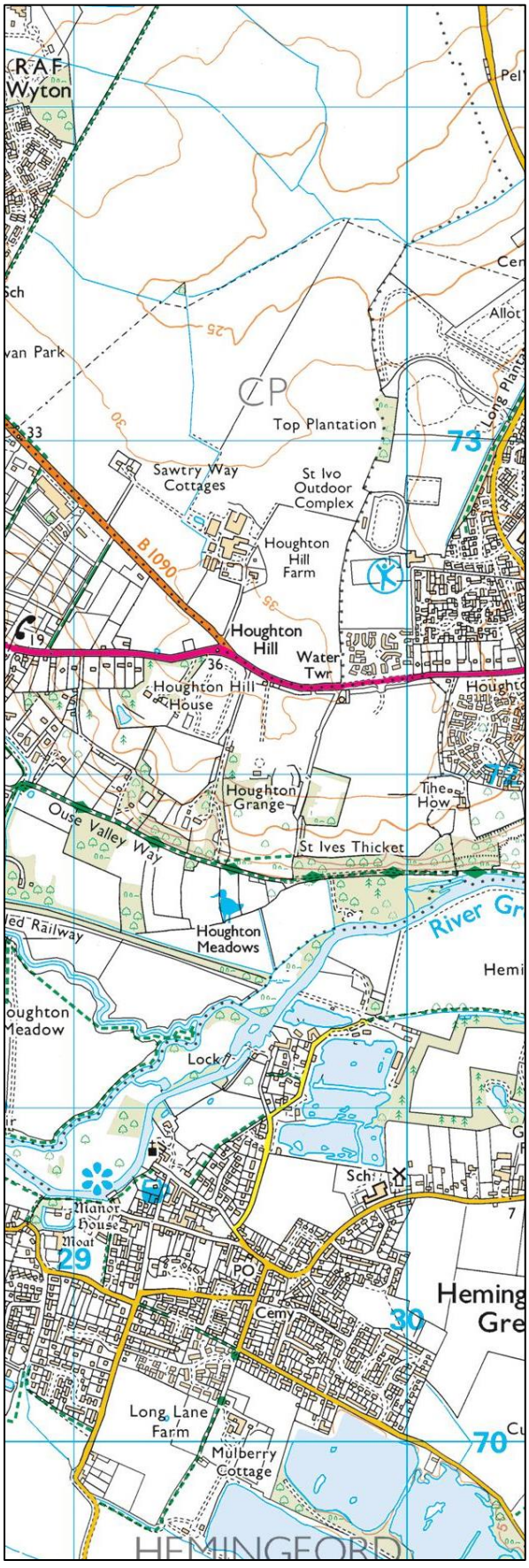


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MICHELLE BOLGER
Expert Landscape Consultancy

Land off Houghton Road, Houghton

Review of
Amended Planning Application

Prepared for
Huntingdonshire District Council

Application Ref
23/00627/OUT

November 2024

Prepared by:	[redacted]
Position:	**Director**
Qualifications:	FLI, Dip. LA, BA (Hons) LA, PGCE, BA (Hons) Eng
File name:	1273 Houghton Grange Amended Application Final.docx
Date issued:	19th November 2024
Status:	Final

Amended Application

Introduction

1. In April 2024 Michelle Bolger Expert Landscape Consultancy (MBELC) prepared a review of an application 23/00627/OUT for up to 120 homes on land west of St Ives for Huntingdonshire District Council (MBELC Review). This was a February 2024 revision (Revised Application) of an original application which had been submitted in 2023. In September 2024 the Applicant submitted an amended application (Amended Application) which has addressed some of the issues raised in the MBELC Review.

2. The amendments are set out in the Amended Design and Access Statement (ADAS) and they can be summarised as follows:

    - Changes to the Houghton Road Frontage;
    - Changes to the eastern edge of the development;
    - Changes to the development footprint; and
    - Changes to public open space (POS) within the development.

3. An Amended Landscape and Visual Appraisal (LVA) has been submitted but it appears to be the same LVA that was submitted with the Revised Application in February 2024, the only difference being that it has a new Homes England front cover dated September 2024. We did not raise any issues with the adequacy of the Revised Application LVA or the judgments it contained and have not reviewed it again.

Houghton Road Frontage

4. There have been two key changes in the Amended Application to the Houghton Road frontage:

- A lower density approach along the Houghton Road frontage has been adopted with the larger buildings shown on the Parameters Plan (Rev 04 dated 13/01/23) omitted from the frontage area. The Amended Parameters Plan (Rev 06 dated 08/08/24) shows the hights of buildings to the east of the access road heights are '*up to 8.5m maximum building height to ridge line from finished ground level*.'[1]
- The buildings have been pulled back from Houghton Road '*between 19m and 22m to the west of the access road and between 45m and 60m to the east of the access road*.'[2]

5. Both these changes are welcome. They will enable a tree-lined character for Houghton Road to be established as required by Policy SI 1, and they will help to soften the urbanising effect that has already occurred due to the road widening and signalled traffic junction.

6. It is not clear why the restriction to 8.5m height is not shown as continued along the edge of Houghton Road west of the access road. Given that both sides of the access road are identified as having no more than 23dph, it would seem appropriate for the 8.5m height to extend along the whole of the frontage.

Eastern Edge of Development

7. There are three changes in the Amended Application along the eastern edge of the development area:

- Building heights are restricted to '*up to 8.5m maximum building height to ridge line from finished ground level*'[3];
- Additional woodland planting is proposed along the edge, within the open space that lies east of the development area; and
- The south eastern corner of the proposed development area, where it is closest to new development at the How, has been pulled back.

[1] Amended Parameters Plan
[2] Amended Design and Access Statement Page 2
[3] Amended Parameters Plan

8. These changes to the eastern edge of the development will help to strengthen the sense of separation between the proposed development area and the new housing development, on Houghton Road west of the Spires, and at The How.

Development Footprint

9. The changes to the Houghton Road frontage and the eastern edge of the development in the Amended Application have reduced the overall built development area (from 4.93 ha to 4.45 ha) but the number of dwellings has remained at up to 120. It is assumed that this has been achieved by increasing the density in the more central parts of the site. As set out above the changes along Houghton Road and the eastern edge of the development are welcomed.

10. Without detailed proposals it is difficult to know whether the increased density towards the centre of the proposed development would increase adverse landscape or visual effects. However, the reduction in footprint without a reduction in numbers will inevitably increase the overall density and this may detract from the sense of a village character from Houghton Road approach that the DAS (Page 2) says the changes are seeking to achieve. HDC's urban designer may wish to comment further on this.

Public Open Space (POS)

11. POS within the Amended Application has been reorganised to create a north-south linear POS rather than a central park. This is an outline application and the linear POS is indicative only, however, given the attractive and accessible landscape that lies to the south of the proposed development, creating welcoming access routes to it is desirable.

12. The ADAS also refers to proposed 'Green Avenues' which are '*envisaged to be located within the development area and the eastern open space and to be composed of a line of trees indicating the north-south connection from Houghton Road in the north to the open space and the St Ives Thicket to the south.*' The intention here is welcomed however, it is not entirely clear where they are to be located. I assume the Parameters Plan is the means by which they are '*to be secured by the outline planning application.*' The Parameters Plan shows a single '*Proposed Green Avenue (street with trees on both sides)*' and two '*linear green spaces'* all within the development area. There is no '*Green Avenue'* shown within the Eastern Open Space.

13. I would expect the '*Green Avenue'* within the open space to be different in character to a '*Green Avenue'* that is internal to the development. Some more detail is required with regard to the location of the '*Green Avenue'* within '*the eastern open space'* and its character.

Summary

14. The amendments to the application are welcomed from a landscape and visual perspective. It would be desirable if:

- The height restriction to 8.5m was extended west of the access road and therefore encompassed the whole of the Houghton Road frontage; and
- More detail was provided with regard to the location and character of the '*Green Avenue'* within '*the eastern open space*.'



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Application Site Boundary

For context

- Houghton Grange Phase 1 masterplan (19/01180/REM)
- The How masterplan (19/02280/FUL)
- Water main and 5m easement
- Foul water rising main and 3m easement
- Consented Houghton Grange Phase 1 SuDS pond
- Consented Houghton Grange Phase 1 Access Road
- Existing primary access point
- Existing & consented cycle/ pedestrian routes
- How Masterplan consented cycle/pedestrian routes
- Existing trees to be retained

For approval

- Development area up to 10m maximum building height to ridge line from finished ground level
- Development area up to 8.5m maximum building height to ridge line from finished ground level
- No more than 23dph, calculation based on the extent of hatched area
- Proposed tree area
- Houghton Road frontage tree planting
- Highway verge (with breaks for access roads and private drives)
- Indicative location for linear green space
- Proposed open space
- Proposed street trees (with breaks for access roads and private drives)
- Proposed tree line along the edge lane
- Proposed SuDS Pond (maximum extent of water)
- Indicative location for proposed community garden/orchard

Up to 15m tolerance either side applies to the following features to allow for detailed design. Precise locations and details of the following to be confirmed at detailed design at reserved matters stage.

- Proposed pedestrian access points
- Proposed shared cycle/ pedestrian access points
- Proposed shared cycle/pedestrian routes
- Proposed pedestrian routes
- Indicative location of Local Equipped Areas for play (LEAP)
- Indicative location of informal play area

N 0 50m 100m 250m

Project Management Initials: Designer: SP Checked: NS Approved: JH ISO A1 594mm x 841mm

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Filename: \\NA.AECOMNET.COM\LFS\EMEALONDON-IUKLON06LEGACY\UKLON06PFPSW001\UKLON06PFPSW001-V1\DPE\PROJECTS\2017\HCA HOUGHTON GRANGE\MASTERPLAN UPDATE\1_PARAMETER PLAN\250402_PARAMETER PLAN.DWG

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GENERAL NOTES

ISSUE/REVISION

I/R	DATE	DESCRIPTION
08	03.04.2025	GENERAL AMENDMENTS
07	19.12.2024	GENERAL AMENDMENTS
06	08.08.2024	GENERAL AMENDMENTS
05	19.06.2023	DIMENSIONS ADDED
04	30.01.2023	FOUL WATER RISING MAIN
03	15.12.2021	GENERAL AMENDMENTS
02	16.09.2021	AMENDMENTS POST PRE-APP
00	15.06.2021	FIRST ISSUE

SCALE 1:2000@A1/1:4000@A3

PROJECT NUMBER

60545167

SHEET TITLE

PARAMETER PLAN: FOR APPROVAL

SHEET NUMBER

003



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Application Site Boundary

For context

- Houghton Grange Phase 1 masterplan (19/01180/REM)
- The How masterplan (19/02280/FUL)
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- Foul water rising main and 3m easement
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- Indicative location of informal play area

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09	07.05.2025	DIMENSIONS ADDED
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PROJECT NUMBER

60545167

SHEET TITLE

PARAMETER PLAN: FOR APPROVAL

SHEET NUMBER

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ISSUE/REVISION

I/R	DATE	DESCRIPTION
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PROJECT NUMBER

60545167

SHEET TITLE

ILLUSTRATIVE MASTERPLAN

SHEET NUMBER

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DEVELOPMENT MANAGEMENT COMMITTEE 20th OCTOBER 2025

Case No: **25/01248/FUL**

Proposal: **Change of use from dwelling (Use Class C3) & agricultural land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking.**

Location: **Hemingford Park, Common Lane, Hemingford Abbots**

Applicant: **Dr Phil Kaziewicz**

Grid Ref: **527646 270899**

Date of Registration: **09.07.2025**

Parish: **Hemingford Abbots**

RECOMMENDATION - APPROVE

This application is referred to the Development Management Committee (DMC) as the Officer's recommendation is contrary to that of the Parish Council.

0. BACKGROUND

0.1 This application was on the 15th September DMC agenda with an officer recommendation of approval.

0.2 On the morning of the 15th September, Officers received a letter from Richard Buxton Solicitors on behalf of Hemingford Parish Council raising concerns with the Officer Report. Officers withdrew the application from the 15th September agenda so the contents of the letter could be considered.

0.3 In response to concerns raised by the Parish Council, the applicant has provided an Addendum to the Heritage Statement alongside a letter setting out points to assist Members in response to the Richard Buxton Solicitors letter. This was sent out for a public 14 day consultation which expired on the 8th October.

0.4 Given that Members did not consider or discuss the application at the 15th September DMC because it was withdrawn from the agenda, Officers have incorporated consideration of the above issues into this new report.

1. DESCRIPTION OF SITE AND APPLICATION

1.1 Hemingford Park Hall is a Grade ll* Listed private residence situated within generous grounds to the south-west of Hemingford Abbots and within the Hemingfords Conservation Area (CA). Outside of the residential curtilage of Hemingford Park Hall, the parkland is in agricultural use. Within the residential curtilage, there is a pool/spa building and various other ancillary structures – some of which are already in use as short term visitor accommodation. There are other Grade ll Listed Buildings within the grounds and some structures (given their relationship and construction date) are considered to be curtilage listed. The Lodge House at the Rideaway entrance is a Grade II listed building.

1.2 The Hall and associated contemporary buildings are attributed to the architect Decimus Burton and originally constructed in c1843 for the Reverend James Linton. The buildings, garden and Parkland, within which they are located are within the designated Hemingford Abbots Conservation area.

1.3 The Hall and Park are accessed from two points, the first off Common Lane in the village and the second at the Lodge House off the Rideaway on the south side of the Park beyond the outskirts of the village on its southern side.

1.4 In terms of other constraints, the site is considered to be within the Countryside. There are some trees subject to Preservation Orders to the north-eastern access to the site (from Common Lane) and, given the location within the CA, any trees within the site are afforded formal protection. The site is also within Flood Zone 1 and has a low risk of flooding as per the most recent Environmental Agency Flood Risk Maps and Data.

1.5 The application seeks planning permission for the Change of use from dwelling (Use Class C3) & agricultural land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking.

1.6 The Planning Statement sets out the following:

The proposed development at Hemingford Park entails a change of use to enable the estate to function as a wedding venue and wellness centre. This will create a viable and sustainable future for the estate by diversifying its use and enhancing public access and enjoyment of its heritage assets. In summary, the estate will operate as follows:
(a) Wedding Events: The venue will host weekend wedding events primarily between May and September and in December but they can take place all year round. Each event will typically span Friday to Sunday. Guests may arrive on Friday, the main event will take place on Saturday, and departure and cleaning will occur on Sunday.

(b) Holiday Accommodation and Wellness Centre: When not in use for weddings, the hall and cottages will be available for holiday lets. The wellness centre will be open to the public Monday through Thursday and on non-event weekends, offering individual or small group bookings for spa and wellness experiences.
(c) Operational Capacity and Employment: The operation will support year-round economic activity, employing 5 full-time staff and full-time equivalent of 2 to 3 part-time or contract staff. Local service providers such as traffic and noise marshals, caterers, florists will also be engaged, supporting local economic growth.
(d) Local Economic Benefits: As well as providing a sustainable economic future for the heritage assets contained on the site and generating jobs in the process, the business plan demonstrates significant economic benefits for local businesses; supporting worthwhile employment especially within small companies and sole traders. The business described in this application will increase trade at the only local pub in Hemingford Abbots and the only local shop in the whole of the Hemingfords (Hemingford Grey), helping to secure the future viability of both, and to pubs and tourist destinations slightly further afield in villages like Houghton.
(e) Energy and Sustainability: The event and wellness centre will operate without the use of fossil fuels, using air-source heat pumps and supplemented by an existing 50kW solar array. This ensures a low-carbon operation in line with national and local climate objectives.
(f) Community Benefits: The venue will offer free or discounted access to local charities and residents on a limited basis, helping to foster community engagement and support.

<u>Weddings and Events</u>
Wedding receptions will take place in the pool house. The swimming pool has been designed and constructed to have a special cover to allow the main pool area to operate as either a private function space or a pool. The proposed mixed use will take place within buildings already constructed and no new buildings are required to facilitate the expanded commercial use thereby making efficient use of existing facilities. The applicant proposes the following scope to the wedding business:
(a) Maximum of 26 weddings per year held on Saturdays (although spanning Friday to Sunday).
(b) Maximum of 180 guests.
(c) Event guests to use the Rideaway and eastern track access only (shown green on the Vehicle Access Plan HP004 –PB003(A).
(d) Event guests to be 'managed' in terms of their space usage by on-site marshals in accordance with HP004-PB004(A).
(e) Event guests to park on the hard standing outside the existing agricultural barn (future hotel) only (shown on the associated car parking layout plan).
(f) Operational Hours 0800 and closing at midnight.
(g) No external amplified music and indoor amplified music to stop at 2300.

(h) No guests to be allowed outside in front of the facility after 1900.
(i) No fireworks or Chinese lanterns.

The wedding ceremony will either take place within the pool house or on the eastern terrace of Hemingford Park Hall (shown pale orange on HP004–PB004(A). Any use of the eastern terrace and lawn (shown pale orange on HP004–PB004(A) would cease by 1900. Use of outdoor areas for weddings after 1900 would be limited to the walled garden (shown Purple on HP004–PB004(A).

Proposed Wellness Centre Use
The applicant proposes the following for the commercial use of the proposed wellness centre:
(a) Opening time 1000 and closing time 1800, 7 days per week.
(b) No more than 14 guests allowed to use the spa facility at any one time
(c) The same access and parking arrangements would apply to wellness centre guests as event guests.
(d) The spa would not operate independently on wedding days but would be available for use by up to 14 members of the wedding party at any one time.

Operational Requirements for all uses
The applicants are in a position to control the operational activities on the site and propose the following:-
(a) All guest vehicles will use the entrance from Rideaway for access and exit. There will be no guest access from Common Lane.
(b) All commercial service vehicles will use the entrance from Rideaway for access and exit. There will be no service vehicle access from Common Lane.
(c) On entry vehicles would then use the eastern access track leading to either the event facility or the parking area located around the existing agricultural barn (future hotel) to the north of the site.
(d) All guests would park in the area next to the agricultural building (future hotel) in the allocated parking area as per the submitted car parking plan.
(e) Access to the event facility by vehicle (shown orange) will be limited to drop-offs, deliveries, and emergency vehicles.

1.7 The original description of development was 'Change of use from dwelling (Use Class C3) & agricultural land to a wedding and events venue (Sui Generis) with guest sleeping accommodation and parking'. This was changed following discussions between officers and the agent to the current description. A full 21 day neighbour (over 100 letters sent to residents), parish, consultee, site notice and press advert was carried out on the revised description. Officers also granted an extension to the consultation period for both the Parish Council and neighbours. Officers are therefore satisfied that not only have the statutory duties been

complied with but also the Parish Council and neighbours have had adequate time to consider the proposals.

1.8 This application has been accompanied by the following:

- Planning Statement
- Heritage Statement (including addendum)
- Transport Technical Note
- Noise Assessment
- Odour Assessment
- Economic Analysis
- Flood Risk Assessment
- Drawings
- Covering letter provided by the agent received 24th September 2025
- Heritage Statement addendum received 24th September 2025

1.9 Officers have scrutinised the plans and have familiarised themselves with the site and surrounding area.

2. NATIONAL GUIDANCE

2.1 The National Planning Policy Framework (NPPF 2024) is a material consideration. It sets out the three objectives - economic, social and environmental - of the planning system to contribute to the achievement of sustainable development. The NPPF 2024 at paragraph 10 provides as follows: 'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).'

2.2 The NPPF 2024 sets out the Government's planning policies for (amongst other things):

- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- achieving well-designed, beautiful and safe places;
- conserving and enhancing the natural, built and historic environment

2.3 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provide statutory duties to be applied when considering impacts on Listed Buildings (including their settings) and Conservation Areas. The Planning Practice Guidance and the National Design Guide 2021 are also relevant and material considerations.

For full details visit the government website National Guidance

3. PLANNING POLICIES

3.1 Huntingdonshire's Local Plan to 2036 (Adopted 15th May 2019)

- LP1: Amount of Development
- LP2: Strategy for Development
- LP4: Contributing to Infrastructure Delivery
- LP5: Flood Risk
- LP6: Waste Water Management
- LP7: Spatial Planning Areas
- LP11: Design Context
- LP12: Design Implementation
- LP14: Amenity
- LP15: Surface Water
- LP16: Sustainable Travel
- LP17: Parking Provision and Vehicle Movement
- LP21: Town Centre Vitality and Viability
- LP22: Local Services and Community Facilities
- LP25: Housing Mix
- LP30: Biodiversity and Geodiversity
- LP31: Trees, Woodland, Hedges and Hedgerows
- LP34: Heritage Assets and their Settings

3.2 Supplementary Planning Documents (SPD) and Guidance:

- Huntingdonshire Strategic Flood Risk Assessment (2024)
- Huntingdonshire Design Guide Supplementary Planning Document (2017)
- Developer Contributions SPD 2011
- Huntingdonshire Landscape and Townscape SPD (2022)
- Cambridgeshire Flood and Water SPD 2017
- Annual Monitoring Review regarding housing land supply (2024)
- Hemingfords Conservation Area Character assessment (June 2008)

Local policies are viewable at https://www.huntingdonshire.gov.uk

3.3 The National Design Guide (2021):

- C1 - Understand and relate well to the site, its local and wider context
- I1 - Respond to existing local character and identity
- I2 - Well-designed, high quality and attractive
- B2 - Appropriate building types and forms
- M3 - Well-considered parking, servicing and utilities infrastructure for all users
- N3 - Support rich and varied biodiversity
- H1 - Healthy, comfortable and safe internal and external environment
- H2 - Well-related to external amenity and public spaces
- H3 - Attention to detail: storage, waste, servicing and utilities.

For full details visit the government website

4. RELEVANT PLANNING HISTORY

- 0500222FUL - Erection of an agricultural building for livestock (APPROVED)
- 1400578FUL - Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds (APPROVED)
- 1400579LBC - Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds (APPROVED)
- 1408234COND - Condition information for 1400578FUL & 1400579LBC (C2 CONDITION REPLY)
- 1408293COND - Condition information for 1400578FUL & 1400579LBC (C2 CONDITION REPLY)
- 15/80183/COND - Condition information for 1400578FUL & 1400579LBC (DISPOSED)
- 18/02612/FUL (Extension of Existing Barn for Cattle and Hay Feed Store((APPROVED)
- 21/01768/FUL - Change of use to allow for a mixed use as private residence (Class C3a), a wedding and corporate events venue (sui generis use) with ancillary guest accommodation and parking (APPEALED AGAINST NON-DETERMINATION, APPEAL WITHDRAWN)
- 22/02454/NMA - Non material amendment for 1400578FUL to vary the floor plans and elevations in respect of the pool house. (REFUSED)
- 22/02452/LBC - Construction of a two storey pool house and spa with basement parking (Retrospective) (WITHDRAWN)
- 23/01739/HHFUL & 23/01749/LBC - Retention of pool building, basement car park, lift and enclosure, external courtyards, pond and associated hard and soft landscaping (revised siting) phased alterations to pool building (reduction in height), removal of staircase, removal of glazed balustrade to pond and alterations to fenestration of main façade. (APPEALED AGAINST NON-DETERMINATION, APPEAL WITHDRAWN)
- 23/01770/LBC & 23/01764/FUL - Change of use of pool building and garden area to use for events and a commercial spa and

change of use to agricultural track and hard standing for agricultural and commercial use associated with use of the pool house. (WITHDRAWN)

- 24/01218/P3MPA - Change of use of an agricultural building to hotel use (C1). (APPROVED)
- 24/02342/HHFUL & 24/02343/LBC - Retention of pool building, basement car park, lift and enclosure, external courtyards, pond and associated hard and soft landscaping (revised siting), phased alterations to pool building (reduction in height), removal of staircase, removal of glazed balustrade to pond and alterations to fenestration of main façade (APPROVED)
- 25/00767/HHFUL & 25/00775/LBC - Proposed replacement greenhouse (retrospective) (APPROVED)
- 25/01451/CLED - Certificate of existing lawful use for tracks. (CERTIFICATE GRANTED)

5. CONSULTATIONS

5.1 Hemingford Abbots Parish Council –

Original comments received on 22nd August 2025.

Object on the following grounds:

- No details of what other events may take place
- Traffic/highway safety – concern over the information submitted in light of resident's own traffic report.
- Inadequate parking proposed
- Noise and disturbance (people leaving at the end of the event). Concern over the information submitted.
- The track running in front of Hemingford Park Hall and the impact upon the heritage assets as well as the ridge and furrow
- Impact upon heritage assets

Further comments received 15th September 2025.

- Officers have failed to consider Para 209 of the NPPF as there has been deliberate damage to the ridge and furrow
- Officers have failed to properly consider the implications of the proposed development on the ridge and furrow
- Officers are prematurely relying on 25/01451/CLED

5.2 Cambridgeshire County Council Highway Authority – No objection subject to conditions.

5.3 Huntingdonshire District Council Environmental Health Officer – No objection subject to condition

5.4 Huntingdonshire District Council Conservation Officer – No comment.

5.5 Historic England – No comment.

5.6 Lead Local Flood Authority – No objection.

5.7 Cambridgeshire Fire & Rescue Service – Requests a condition for the provision of fire hydrants

5.8 Ecology Officer – No objection subject to conditions.

(Full responses are available on the website).

6. REPRESENTATIONS

6.1 Letters of objection were received from 52 local residents/neighbouring properties during the course of the application. The concerns raised have been summarised below:

- The proposal would harm the historic setting through increased traffic, noise, lighting, and commercial activity
- Impact of the track upon the ridge and furrow, setting of the Listed Building and Conservation Area
- Weddings will be late spring to early autumn resulting in most events taking place within a few months of the year
- Noise and disturbance (people leaving at the end of the event, music, amplified speech, and fireworks) to the residents of Hemingford Abbots, in particular Common Lane and Rideaway
- Failure to provide robust acoustic assessment
- Disturbance to the tranquil setting of the countryside, Conservation Area and village
- Additional traffic and congestion
- Failure to provide robust highways assessment
- Inadequate parking for events
- Potential light pollution from the events
- Potential impact upon local biodiversity
- Failure to complete biodiversity checklist and failure provide PEA
- Risk of increase flooding
- Additional load in the already at capacity water and sewerage system
- Lack of demand for this type of service
- Approving this application will create a precedent for future expansion
- economic benefits are overstated as guests chose vendors
- Inadequate consultation by the Council

6.2 Letters of support were received from a total of 61 residents (comprising of local businesses, local residents/neighbouring properties and residents from nearby villages/towns etc). The support raised have been summarised below:

- Long term use of heritage assets
- New commercial enterprise

- Economic benefits for the local area in terms of employment and spending

7. ASSESSMENT

7.1 When determining planning applications, it is necessary to establish what weight should be given to Development Plan policies in order to come to a decision. The following legislation, government policy (national and local) and guidance outline how this should be done.

7.2 Under the Town and Country Planning Act 1990 (Section 70(2)) in dealing with applications for planning permission the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. Under the Planning and Compulsory Purchase Act 2004 (Section 38(6)), the application must be determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated within paragraph 48 of the NPPF (2024). The development plan is defined in Section 38(3)(b) of the 2004 Act as "the development plan documents (taken as a whole) that have been adopted or approved in that area".

7.3 In Huntingdonshire the Development Plan (relevant to this application) consists of:

- Huntingdonshire's Local Plan to 2036 (2019)
- Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)

7.4 The statutory term 'material considerations' has been broadly construed to include any consideration relevant in the circumstances which bears on the use or development of the land: *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor* [2011] EWHC 97 (Admin); [2011] 1 P. & C.R. 22, per Lindblom J. Whilst accepting that the NPPF does not change the statutory status of the Development Plan, paragraph 2 confirms that the NPPF is a material consideration and significant weight is given to this in determining applications.

7.5 The main issues to consider in the determination of this application are:

- The Principle of Development
- Design, Visual Amenity and Impact on Heritage Assets
- Residential Amenity
- Highway Safety, Access and parking provision
- Flood Risk and Surface Water
- Biodiversity
- Trees
- Developer Obligations

- Other matters

The Principle of Development

7.6 The application seeks planning permission for Change of use from dwelling (Use Class C3) & agricultural land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking.

7.7 As the site falls within the open countryside, a number of policies are considered to be relevant to the proposal.

7.8 Policy LP2 (Strategy for Development) of the Huntingdonshire Local Plan to 2036 (the Local Plan) sets out the overarching development strategy for Huntingdonshire through the plan period. The main objectives are:

- Concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities;
- Direct substantial new development to two strategic expansion locations of sufficient scale to form successful, functioning new communities;
- Provide opportunities for communities to achieve local development aspirations for housing, employment, commercial or community related schemes;
- Support a thriving rural economy;
- Protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside;
- Conserve and enhance the historic environment; and
- Provide complementary green infrastructure enhancement and provision to balance recreational and biodiversity needs and to support climate change adaptation.

7.9 Policy LP10 (The Countryside) places significant restrictions on developments in such locations, referring to only “limited and specific opportunities as provided for in other policies of this plan” as being acceptable in principle. Policy LP10 requires all development in the countryside to:

(a) seek to use land of lower agricultural value in preference to land of higher agricultural value:
  (i) avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and
  (ii) avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;

(b) recognise the intrinsic character and beauty of the countryside; and

(c) not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

Loss of a dwelling

7.10 The Huntingdonshire Local Plan to 2036 does not contain any specific policies that prohibit proposals which result in the loss of a residential dwelling.

7.11 NPPF paragraph 61 states that the Government's objective is to significantly boost the supply of homes, and paragraph 78 requires the Council to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against our housing requirement.

7.12 A substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements was introduced on 12th December 2024 in the revised NPPF and associated NPPG (the standard method).

7.13 As Huntingdonshire's Local Plan to 2036 is now over 5 years old it is necessary to demonstrate a five year housing land supply (5YHLS) based on the housing requirement set using the standard method. NPPF paragraph 78 also requires provision of a buffer to ensure choice and competition in the market for land. As Huntingdonshire has successfully exceeded the requirements of the Housing Delivery Test a 5% buffer is required here. The 5 year housing land requirement including a 5% buffer is 5,501 homes. The current 5YHLS falls short of 5 years' supply.

7.14 While the Local Plan does not contain specific policies that prohibit the loss of a dwelling, in light of the Council's current inability to demonstrate a five-year housing land supply, the loss of a residential dwelling is contrary to national policy objectives and must be weighed appropriately against the proposal in the overall planning balance (which will be at the end of this report).

Agricultural land

7.15 Land within the red line and surrounding the residential curtilage of Hemingford Park Hall is Grade 3 agricultural land. Taking into account this is a change of use application that does not propose any operational development on agricultural land within this application, , the layout and size of the agricultural land, the fact it is within the setting of grade II* building used and currently only used for the grazing of livestock, the change of use of this agricultural land is considered acceptable.

Provision of a wellness centre (Class E) and wedding and events venue (Sui Generis)

7.16 As the site is located within the countryside, local plan policies such as LP19 (Rural Economy) and LP23 (Tourism and Recreation) are relevant here.

7.17 The aim of Policy LP19 is to promote a vibrant rural economy within the district's extensive countryside to support businesses with a genuine need to be located in the countryside. Whilst the proposal does not meet any of the qualifying criteria for new business development, the Planning Statement sets out the argument that the proposal enhances the long-term viability of the Grade II* Listed Building, without causing unacceptable harm to the built or natural environment. This will be discussed in the below relevant section 'Design, Visual Amenity and Impact on Heritage Assets' and will be weighed appropriately in the overall planning balance (which will be at the end of this report).

7.18 Policy LP23 states A proposal for a new or expanded tourism, sport or leisure use in the countryside will be supported where it can be demonstrated that:
a. it is well-related to a defined settlement unless there are robust operational or sustainability reasons why it needs to be located elsewhere;
b. it does not cause harm to, and where appropriate, enhances the ecological, landscape and heritage significance of the proposed location;
c. the impact of the scale, character and location of the development on both its immediate surroundings and the wider landscape are minimised as far as possible;
d. adequate servicing can be provided, including water supply, electricity and for sewage and waste disposal; and
e. it will not have an adverse impact on any internationally or nationally designated wildlife site through increased visitor pressure.

7.19 Policy LP23 lends support for new leisure development in the countryside if a proposal demonstrates compliance with the above criteria. It is considered that the proposal does comply with the criteria set out in the policy.

7.20 Overall, the principle of development is considered acceptable. Other material planning considerations are discussed below.

Design, Visual Amenity and Impact on Heritage Assets

7.21 The application site relates to the Grade II* Listed Hemingford Park Hall which is also within the Hemingfords Conservation Area. The wider site contains some separate Grade II Listed outbuildings with additional curtilage listed structures.

7.22 Section 72 of the Planning (LBCA) Act 1990 states that special attention shall be paid to the desirability of preserving or

enhancing the character or appearance of a Conservation Area. Section 66 of the Planning (LBCA) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

7.23 Para. 212 of the NPPF set out that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Para. 213 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification…'

7.24 Local Plan policy LP34 aligns with the statutory provisions and NPPF advice.

7.25 Policy LP11 of the Local Plan states that a proposal will be supported where it is demonstrated that it responds positively to its context. Policy LP12 states that new development will be expected to be well designed and that a proposal will be supported where it can be demonstrated that it contributes positively to the area's character and identity and successfully integrates with adjoining buildings and landscape. This is also reflected in Policy the Huntingdonshire Design Guide SPD and Section 12 of the National Planning Policy Framework (2024).

7.26 Both Historic England and the Council's Conservation Team were consulted as part of the application and offer no comment on the application.

7.27 The proposed change of use does not involve any physical alteration or works to the Listed Buildings or any of the curtilage Listed Buildings or structures as part of the proposed development.

7.28 If the change of use is granted, the applicant will need to demonstrate compliance with the necessary building regulations. This is separate from the planning process. However, if any potential alterations to the historic fabric of the Listed Buildings are required to ensure compliance with Building Regulations, a Listed Building Consent will need to be submitted. This will be assessed on its own merits and determined under the Planning (Listed Buildings and Conservation Areas) Act 1990 and associated heritage policies.

7.29 The Planning Statement sets out that the activities associated with the change of use would be confined to a discrete area within the estate, principally the main house and the modern spa and pool building, and that these activities are consistent with a private estate context and would not diminish the significance of the buildings or their immediate or wider settings.

7.30 Concerns have been raised by the Parish Council and neighbouring properties in relation to the access tracks, and in particular the track that is in situ in front of Hemingford Park Hall. A certificate has been granted under reference 25/01451/CLED which confirms the lawfulness of the tracks.

7.31 Richard Buxton Solicitors on behalf of the Parish Council have raised the following points in their letter of 15 September 2025:

- Officers have failed to consider Para 209 of the NPPF as there has been deliberate damage to the ridge and furrow through the unlawful and deliberate laying of a track
- Officers have failed to properly consider the implications of the proposed development on the ridge and furrow.
- Officers are prematurely relying on 25/01451/CLED.

7.32 In support of the letter from Richard Buxton Solicitors, a Heritage Assessment by Pegasus Group on behalf of the residents of Hemingford Abbots has been provided (the Heritage Assessment was first submitted in response to an earlier application on the site). Officers note the content of this third party Heritage Assessment, and the relevant pages relating to Ridge and Furrow. Both the Richard Buxton Solicitors' letter and the Heritage Assessment by Pegasus Group are appended to this Report.

7.33 The applicant has provided an addendum to the Heritage Statement which describes the significance of the ridge and furrow potentially affected and assesses the potential impact of the proposal upon that significance. The applicant has also provided a covering letter with the Addendum Heritage Statement and both are appended to this Report. The Heritage Statement Addendum adopts the Hall/English Heritage methodology, 2001 methodology for the assessment of ridge and furrow. The methodology looks at a number of criteria: Group Value (Association), survival, potential, documentation (archaeological and historical), diversity (features) and amenity value. In summary, it concludes that the ridge and furrow within Hemingford Park has an overall score of low to medium. Assessment was also carried out against the interests defined in the NPPF (architectural, artistic, historic, and archaeological).

7.34 In terms of the assessment of the proposal, its potential impact and effects on the significance, the addendum makes a number of points. It states that the proposals do not include works that would physically impact, cause loss of, or diminish the extent of surviving ridge and furrow within Hemingford Park, noting the access track

for which a Lawful Development Certificate has been granted. The proposals do not seek to change the openness or the features of the parkland setting which make a positive contribution to the setting of the Grade II* listed Hemingford Park Hall, or its Grade II listed ancillary estate buildings. The ridge and furrow would remain a visible and appreciable landscape feature within the parkland, sustaining their historic and archaeological interests. The ridge and furrow forms part of the landscape used for the production of hay. The change of use of Hemingford Park Hall would maintain the established requirement to mow or graze those parts of the parkland in which ridge and furrow survives. These activities or actions, including use of agricultural machinery and human footfall, would not in themselves cause impacts sufficient to cause harm to the non designated heritage asset or the designated heritage assets to which they relate.

7.35 The addendum also notes that the ridge and furrow within the privately owned Home Farm could lawfully be ploughed whilst that within the Godmanchester Eastside Common, to the West of Hemingford Abbots, could be openly accessed by public footfall and activity, or used for grazing (for example).

7.36 The addendum to the Heritage Statement concludes that the incomplete nature and survival, detachment from the wider group, lack of typically affiliated features and its seclusion within a private estate, limit the potential interest of the ridge and furrow. Its survival can most likely be attributed to its inclusion within the parkland of Hemingford Park. The remains of the Hemingford Abbots open field system, notably the surviving ridge and furrow, merits recognition as a non-designated heritage asset. It is important to note that those remains within Hemingford Park are smaller and less complete that those surviving at Home Farm and within the Godmanchester Eastside Common (both of which are included within the Hemingfords Conservation Area but not properly mapped in its character appraisal). Overall is concluded that any potential impacts upon the ridge and furrow would cause no harm to designated or non designated heritage assets. It is therefore concluded that the significance of the ridge and furrow within the application site, as a fragmentary remains of Hemingford Abbots' open field system, would be preserved. Arguably any increase in visitors to the Site would increase its amenity value (Hall, 2001) and exposure to the appreciation of the heritage assets.

7.37 In addition to this, the applicant has provided a covering letter that set outs the following:

- The current lawful position of the site is agricultural. A wide range of normal agricultural activities can therefore lawfully take place without the need for planning permission. This includes the movement of heavy agricultural machinery across the field and the grazing of livestock, both of which

can create as much or more ground impact than the occasional visitor activity proposed. Importantly, it would also be lawful to plough or reseed the land, which would remove the ridge and furrow formation altogether. This has evidently happened in the wider landscape. where most examples of ridge and furrow have already been lost as a result of routine agricultural management. The continued survival of the earthworks at this location is therefore incidental and contingent on past and current land management choices, not secured by planning control.

- The land is actively managed for hay production and is expected to continue in this use. This is a routine and lawful agricultural practice which requires the use of tractors and other heavy machinery to cut, turn, rake and bale the grass each season, followed by the removal of bales by tractor and trailer. These operations take place annually and are an inherent part of the ongoing management of the land. The ridge and furrow earthworks have persisted in spite of this repeated agricultural activity, which is far more intensive than the occasional visitor movements associated with the proposed use. The evidence of survival under continuous hay production makes clear that incidental pedestrian activity will have no measurable impact on the physical form or legibility of the ridge and furrow.

- In addition to the ongoing agricultural use, Part 4 of the General Permitted Development Order (as amended) allows the land to be used for up to 28 days each year for temporary events. Such use could include the erection of marquees, temporary parking and pedestrian or vehicular activity across the grassland, with no planning control or ability for the Council to regulate heritage impacts. In practice, this fallback position represents a greater risk to the ridge and furrow than the present application, because activities and structures could lawfully be placed directly on the land. By contrast, the current proposal concentrates the events on the Hall itself and vehicle movements to the existing lawful track, thereby offering the Council a greater degree of certainty and control over how the land is used.

- Although the whole estate falls within the application site boundary and will form part of the planning unit for the proposed use, the ridge and furrow areas will continue to be maintained in the same manner as at present as part of the site's overall management. This management includes the cutting and baling of hay, undertaken seasonally with agricultural machinery, to keep the grassland in good condition. These operations are part of the wider upkeep of the estate rather than a continuation of a separate agricultural use. No construction or physical alteration is proposed on the ridge and furrow itself, and visitor activity

associated with the new use will be concentrated within Hemingford Park Hall, with access provided via the established lawful track.

7.38 Officers have considered the issues raised by the Parish Council.

7.39 Paragraph 209 of the NPPF states where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

7.40 Officers note the argument put forward by the Parish Council that there has been deliberate damage to the ridge and furrow through the unlawful and deliberate laying of a track.

7.41 The applicant has stated that the track was put in for the purpose of serving the agriculture use on the site (contained within paragraph 1.2(d) of appendix 10 of the Planning Statement submitted in support of 25/01451/CLED). It was not put in with the purpose of causing harm to a heritage asset, but as a means to facilitate and help the lawful uses on the site. It appears that the route chosen was to provide the most direct and appropriate access for the uses on site. It does not appear to have been chosen in any way to cause deliberate harm to the ridge and furrow. Officers therefore consider there is no evidence of deliberate neglect or damage to the heritage asset of ridge and furrow, and NPPF paragraph 209 is not engaged.

7.42 In terms of considering the implications of the proposed development on the ridge and furrow, officers have taken into account the Pegasus report, and also the submitted Heritage Statement Addendum, which used the appropriate methodology for the assessment of the significance of the ridge and furrow. It is considered the incomplete nature and survival, detachment from the wider group, lack of typically affiliated features and its seclusion within a private estate limit the ridge and furrow's potential interest. The proposal does not include any alteration or expansion of the track as passing places are in existence. As discussed below in the relevant sections, conditions such as a noise management plan, which may include management of visitors attending and leaving the site, could help avoid other potential impacts that may arise from the proposed use. It is considered that the proposal will not result in harm to the ridge and furrow and will preserve it. Furthermore, when considering what could take place on the site lawfully and the potential impacts of those lawful activities upon the ridge and furrow, the proposal represents a more appropriate use for preserving heritage assets such as ridge and furrow.

7.43 Even if it were considered that Paragraph 209 was engaged because the track represented deliberate damage to the ridge and furrow as a non designated heritage asset, it is clear from the

above assessment that officers have not given weight to the 'deteriorated state of the heritage asset' in assessing the potential impact of the proposal upon the ridge and furrow and coming to the officer recommendation. The use of the tracks is discussed further below.

7.44 Concerns have also been raised that the proposal would harm the historic setting through increased traffic, noise, lighting, and commercial activity. The change of use proposal will utilise these tracks as they will provide connectivity from the Rideaway access to the pool and spa building, the hotel approved under 24/01218/P3MPA and the proposed parking area.

7.45 However, officers take account of the points made on behalf of the applicant: the lawful use of the site is agricultural, allowing a wide range of agricultural activities; the land is actively managed for hay production which is expected to continue; the General Permitted Development Order allows for temporary events 28 days a year; and that given the extent of the change of use and nature of the operation, the ridge and furrow will continue to be maintained in the same manner as at present as part of the site's overall management. Further, and against that background, officers agree with the applicant's addendum heritage statement that the proposal will preserve the significance of the ridge and furrow within the site. It would preserve the contribution which the former agricultural landscape would make to the significance of Hemingford Park Hall. It would sustain the contribution made by the ridge and furrow to the character and appearance of the conservation area. Moreover, there will be restrictions and control on not only the frequency but also the amount of events through the grant of planning permission (which is discussed in more detail below). As a result, it is considered that the proposed use of the existing tracks as well as the wider site in conjunction with the proposed use will not be harmful to the setting of the Listed Buildings, the non-designated heritage asset Ridge and Furrow, the character and appearance of the Conservation Area, or the countryside.

7.46 The proposal also includes holiday accommodation within the Hemingford Park Hall and the various cottages on the site including the Lodge House. Given that this proposed use is not too dissimilar from the current residential use, it would preserve the significance of the heritage assets and their settings as well as complementing the proposed change of use for the wider site.

7.47 In regard to the proposed wellness Centre, the Planning Statement sets out that the wellness centre will be open to the public Monday through Thursday and on non-event weekends, offering individual or small group bookings for spa and wellness experiences. Wedding receptions will take place in the pool house. The swimming pool has been designed and constructed to have a special cover to allow the main pool area to operate as either a

private function space or a pool. The proposed mixed use will take place within buildings already constructed and no new buildings are required to facilitate the expanded commercial use thereby making efficient use of existing facilities. The proposed use of the pool/spa building would therefore preserve the significance of the heritage assets and their settings.

7.48 The Planning Statement sets out that the proposals present a neutral to beneficial impact in heritage terms. This is consistent with the conclusions of the Heritage Statement submitted in support of the application (Jon Lowe Heritage Ltd, July 2025). Increased public access to the site via its commercial operation would better reveal the significance of the heritage assets, consistent with paragraph 210 (c) of the NPPF (2024). Moreover, the income generated would contribute directly to the future maintenance and conservation of the estate as a whole, providing a sustainable long-term use that aligns with both national policy and the objectives of Policy LP34 of the Huntingdonshire Local Plan.

7.49 The benefits will be discussed at the end of the report within the planning balance section.

7.50 The proposal includes a larger area to be used for car parking beyond the parking area approved under 24/01218/P3MPA. This is on existing hard standing. Acoustic barriers in the form of 1.8-2m close boarded fences are proposed on the north-eastern and the north-western boundaries of the proposed car parking area in order to mitigate potential noise (which is discussed in more detail in the below residential amenity section). This is within the Conservation Area but is situated a distance away from the Grade II* Listed Building and separated by other built form. Given that the general siting and height of the acoustic barriers is known, full details of the acoustic barriers can also be secured by condition. It is considered the visual impact of the 1.8-2m acoustic barrier can be mitigated by soft landscaping which can also be secured by condition. Hard landscaping should also be conditioned. Subject to the conditions, the proposed acoustic barriers and car parking area would not result in harm to the significance of the identified heritage assets and settings.

7.51 The statutory duties under sections 66 and 72 of the Planning, Listed Buildings and Conservation Area Act (1990) require that considerable importance and weight be given to any heritage harm to conservation areas and listed buildings (including their settings). However, overall, it is considered that the proposed change of use here will preserve the character and appearance of the Conservation Area, preserve the Ridge and Furrow and the setting of the Listed Buildings. The proposal will not result in any harm to the significance of the identified heritage assets or to the countryside. The proposal therefore complies with Policies LP10, LP11, LP12 and LP34 of Huntingdonshire's Local Plan to 2036,

Hemingfords Conservation Area Character assessment (June 2008), the provisions of Section 12 of the NPPF (2024) and part C2 of the National Design Guide (2021).,

Residential Amenity

7.52 Policy LP14 of the Local Plan to 2036 states a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the proposed development and maintained for users and occupiers of neighbouring land and buildings.

7.53 Given that the proposal seeks permission for a change of use, the main consideration on residential amenity is noise and odour.

7.54 The nearest residential properties in order of closest are Home Farm to the north-west (immediate neighbour), The Old Pavillion to the east, properties on Common Lane to the north/north-east and properties on Rideaway to the east.

7.55 Officers also note the concern raised by neighbouring properties and the Paish Council about the general odour impact, the general potential noise impact of the events, especially the noise associated with the comings/goings through the use of the car parking area and the access tracks.

7.56 In terms of odour, an Odour Assessment has been submitted with the application. The Environmental Health Team have been consulted as part of the application and are the technical experts regarding odour.

7.57 The submitted Odour Assessment sets out that the activities considered include daytime preparation of hot meals for up to 120 guests, occasional outdoor cooking, and evening use of mobile food vans for informal catering. The nearest receptor, Home Farm, lies 65m away and is screened by a 3m-high wall. Other residential dwellings lie at distances of 205m or more. The assessment finds that the source odour potential is small to medium, with any odours likely to be pleasant or neutral. Local meteorological data and the limited number and duration of event days further reduce risk. To reinforce this conclusion, an Odour Management Plan has been prepared and includes appropriate control measures. These include carbon filtration within the kitchen extraction system, directional controls for food vans, avoidance of food waste build-up, and regular cleaning and maintenance procedures. Mobile food providers will be sited away from receptors, and collections will follow events without delay. A complaints procedure is also in place to ensure prompt action in the event of any concerns. The assessment concludes that odour does not present a constraint to the development, and that the proposed use is acceptable in planning terms. The Environmental Health Team agree with this.

7.58 In terms of noise, the application is supported by a Planning Noise Impact Assessment. The Environmental Health Team have been consulted as part of the application and are the technical experts regarding noise.

7.59 The Noise Impact Assessment (NIA), entitled 'Hemingford Park Hall' reference RP02-21458-R0, dated 21st May 2025 notes that the proposal is for up to 26 events per year, with music finishing at 23:00. The NIA considers there may be an adverse impact whilst larger groups utilise the area to the front of the property, and that this may impact on the property to the southeast. The mitigation proposed is to limit any larger gatherings to prior to 20:00, however the plan for wedding and events indicates that larger groups would be moved along earlier than this. The duration, timings and management of this aspect could form part of a Noise Management Plan (NMP) which could be conditioned.

7.60 The Noise Impact Assessment was completed with the bifold doors open. The door to the ground floor bar area of the pool building will remain closed (with the exception of ingress and egress) whilst amplified music is playing and the use of the doors will form part of the NMP. The use of the external areas will again be covered by the NMP. The use of a sound limiter is a potential mitigation measure to control the music noise levels at source, however because one of the mitigation measures is to close the bifold doors, this would have implications on the level the sound limiter could be set at, so actual (and appropriate) noise monitoring could be more suitable. This would need to be logged and results made available to the LPA on request.

7.61 Members should note that the Planning Officer, the Environmental Health Officer and a Licensing colleague visited the site where a demonstration of music levels took place. Music was played at a high volume, with doors open, and officers were able to observe this from the boundary. However, since this was a one off demonstration, it should be noted this has not been given significant weighting in the Environmental Health assessment and the comments are not based on this alone.

7.62 Acoustic barriers in the form of 1.8-2m close boarded fences are also proposed on the north-eastern and the north-western boundaries of the proposed car parking area in order to mitigate potential noise impact upon. The acoustic barrier on the north-eastern boundary of the car parking area was previously requested by the Parish Council and therefore offered by the applicant. This will help mitigate any potential impact upon the nearest properties on Common Lane to the north-east. The acoustic barrier on the north-western boundary of the car parking area was requested by Environmental Health and will help mitigate any potential impact upon Home Farm to the south-east which is approx. 75m away. The existing building which is the subject of

the 24/01218/P3MPA approval will also help mitigate any potential impact.

7.63 It has also been agreed that the hard standing immediately west to the existing building which is the subject of the 24/01218/P3MPA approval shall not be used for any event parking. Environmental Health have considered whether a further acoustic barrier will be required on the south-east boundary of the car park, but this is not considered necessary.

7.64 The concerns raised by neighbouring properties and the Parish Council regarding the potential noise impact are understood and noted. However from the information available, Environmental Health consider noise from events may be above the Lowest Observed Adverse Effect Level (LOAEL), but will be below the Significant Observed Adverse Effect Level (SOAEL). Therefore, they consider that with robust conditions the impact can be mitigated and reduced to a minimum. The Environmental Health Team have therefore advised there are not grounds to make an objection on noise, subject to appropriate conditions being utilised. Likewise, the Environmental Health Team have advised there are no grounds to make an objection on odour, subject to appropriate conditions being utilised.

7.65 Paragraph 56 of the NPPF states: *Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.* Therefore, Officers must consider whether a proposal can be made acceptable through the imposition of appropriately worded planning conditions.

7.66 The Environmental Health Team have advised that: (1) the imposition of conditions regarding a Noise Management Plan (covering general management of the site and events including bifold doors and when they will be closed, Management of Waste, Management of people, Management of vehicles – speed etc, complaint procedure, Monitoring procedure, management of large groups to the front of the property, leaving procedure and timings, etc); and (2) a noise condition in line with the NIA, Odour Management Plan, limit number of events per calendar year, no events on consecutive weekends, limit times of amplified music, no external amplification, delivery and collection times limited and no fireworks, will address any noise and odour issues.

7.67 It is therefore considered that subject to the imposition of the above conditions, the proposal would not result in an unacceptable impact on the neighbouring properties' amenities and therefore the proposal would be in accordance with Policy LP14 of Huntingdonshire's Local Plan to 2036, the Huntingdonshire

Design Guide SPD and Section 12 of the National Planning Policy Framework (2024) in this regard.

Highway Safety, access and Parking Provision

7.68 Local Plan Policy LP16 sets out that a proposal will be supported where it's likely transport impacts have been assessed and safe physical access from the public highway can be achieved. Local Plan LP17 seeks to ensure that new development incorporates appropriate space for vehicle movements, facilitates access for emergency vehicles and service vehicles and incorporates adequate parking for vehicles and cycles.

7.69 The application is supported by a Transport Technical Note (Paul Basham Associates, May 2025) that builds upon the access and trip generation assessments which were assessed and accepted by the Highway Authority under prior approval ref. 24/01218/P3MPA (conversion of an agricultural building to a hotel). That approval confirmed the suitability of the Rideaway access. Those access arrangements remain unchanged as part of this proposal. To be clear, the proposal does not include use of Common Lane access by the main contractors or guests.

7.70 The Cambridgeshire County Council Highway Authority have been consulted as part of the application and are the technical experts regarding transport and highway safety.

7.71 Officers also note the concern raised by neighbouring properties and the Paish Council about the potential transport impact of the proposal, highway safety concerns about the access onto Rideaway and the inconsistencies within and between the submitted documents.

7.72 The Planning Statement and associated document sets out the following:

'All guest and commercial vehicles associated with the wedding and events venue, wellness centre, and overnight accommodation will be routed via the Rideaway entrance. The Rideaway access measures over 5m in width for a distance of 8m from the public highway and benefits from gates set back 31m, preventing any queuing on the carriageway. Visibility splays of 2.4m x 120m are shown to be achievable in both directions, in line with national guidance and exceeding the requirements based on actual recorded 85th percentile speeds of 33.3mph. The access can safely accommodate vehicles entering and exiting simultaneously, and tracking diagrams confirm that it can be used by a 7.5t box van alongside a standard car, as well as by a fire appliance. There are no proposals for HGV access.

Trip generation is modest and seasonal. The spa facility, operating throughout the week with a maximum of 14 guests at any one time,

is forecast to generate no more than 28 daily two-way trips. Weddings are confined to Saturdays and are expected to generate between 60 and 80 car movements, supplemented by taxis and minibuses. Larger events may charter shuttle buses. These volumes remain within levels previously accepted by the Highway Authority and are comparable to those associated with a small residential development of 10 dwellings. Furthermore, wedding-related traffic occurs outside of weekday peak hours and will not impact the strategic highway network.

Parking provision across the site exceeds 50 formal spaces with ample overspill areas available on existing hardstanding. For a 180-guest event, the majority of guests are expected to arrive via shared transport, with 30 to 40 private vehicles anticipated on site at peak.'

7.73 The Highway Authority provided an initial response and then a further response in light of comments received from neighbouring properties and the Parish Council. The Highway Authority has confirmed that whilst there are inconsistencies within and between documents, the Highway Authority has assessed the highway impact based on the information provided and also factoring in additional vehicle trips for staff, deliveries and servicing, and the occasional larger vehicle.

7.74 The Highway Authority has advised:

- The previous application confirmed that the access is 5m wide for 8m from the carriageway edge which is acceptable.
- Rideaway is a 'C' Class road so acceptable for the additional vehicle movements.
- The additional traffic flow will be insignificant with the exception of on a Saturday when, although it will be greater, it will be tidal with minimal two way movements at the access and will not be at peak times.
- The highway element of the access is adequate for a competent coach driver to use and any issue with over-running or damage will be within the site so a consideration for the applicant, not the LHA.
- Should a large box-type van etc be exiting the access whilst a car is approaching, or vice versa, there is adequate visibility onto the access such that the vehicle will not start to turn into the access and then have to reverse back onto the carriageway. Also, we do not consider it un-safe for a vehicle to wait in the carriageway in this location as there is adequate forward visibility.
- Although the visibility splay to the south is detailed a 2.4m x 120 which is commensurate with a 40mph speed limit, the access is located only approximately 25m north of the start of the speed limit. However, our indicative highway records indicate that a visibility splay of 2.4m x 215m, commensurate with the National Speed Limit, appears to be achievable.

7.75 The Highway Authority has concluded that there would not be an unacceptable impact on highway safety and there is no reason to refuse the application or to request improvements to the access. A condition is recommended to ensure compliance with the submitted Technical note to ensure that delivery/servicing vehicles, wedding guests, and wellness centre users do not access the development via Common Lane. Officers consider that it is appropriate to exclude staff arriving by foot or cycle from this as access to the site from Common Lane would provides a better option for those residing in the village.

7.76 In regard to the amount of parking proposed, officers note the argument put forward by the applicant that 50 formal spaces (with overspill areas available) would be appropriate given that the majority of guests are expected to arrive via shared transport, with 30 to 40 private vehicles anticipated on site at peak. This approach is agreed.

7.77 As such, subject to appropriate conditions, the proposal is considered acceptable in terms of its impact on highway safety and therefore accords with Policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036. The proposals do not conflict with Section 9 of the National Planning Policy Framework (2024).

Flood Risk and Surface Water

7.78 The site is at the lowest risk of flooding according to the Huntingdonshire Strategic Flood Risk Assessment 2024 and Environment Agency Flood Map for Planning (Flood Zone 1) and the proposal is for minor development. A small area of Flood Zone 2 exists at the far eastern edge of the wider landholding but does not affect any operational part of the site. Accordingly the sequential and exceptions tests for flooding not engaged and the submission of a flood risk assessment is not considered necessary in this instance in accordance with the NPPF and NPPG.

7.79 The proposed development involves no new buildings and no changes to ground levels or drainage infrastructure. All access roads, parking areas, and buildings are already in place, and no external alterations are proposed. The site is not connected to the mains sewage/drainage network and therefore the proposed change of use will have no effect on the public system. The Lead Local Flood Authority has raised no objection to the proposal. As such, the proposal is considered to be acceptable with regard to its impact on both flood risk and surface water and therefore accords with Policies LP5, LP6 and LP15 of Huntingdonshire's Local Plan to 2036, and Section 14 of the National Planning Policy Framework (2024) in this regard.

Biodiversity

7.80 Paragraph 187 of the NPPF (2024) states planning policies and decisions should contribute to and enhance the natural and local environment in a number of ways. Policy LP30 of the Local Plan to 2036 requires proposals to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated and ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type, and location of development.

7.81 Concerns have been raised by neighbouring parties that the application has failed to complete the biodiversity checklist and has subsequently failed provide a Preliminary Ecological Assessment to assess the impact of the development on surrounding wildlife.

7.82 Given that the proposal did not include the creation of any new floorspace, it was a matter of planning judgement for officers at validation, who considered that the biodiversity checklist was not required. Nor was a PEA required in order to validate the application.

7.83 The Ecology Officer has been consulted as part of the application. The application seeks permission for a change of use only, making use of the existing access, tracks, and buildings. The site currently accommodates both residential use (including short-term visitor accommodation) and agricultural activities. The proposed change will result in an intensification of use, particularly in terms of visitor numbers, traffic, and associated noise. However, this will be limited to a maximum of 26 events per year, with activities concentrated around the main buildings. The Ecology Officer notes that the Environmental Health Team have recommended conditions to ensure noise is appropriately managed. In addition to those conditions, the Ecology Officer recommends a condition of no lighting without prior consent and no overnight stays outside of the built form. The Ecology Officer has advised that based on the information submitted, they raise no objections to the application. Officers accept the advice and these conditions are therefore recommended.

7.84 It is therefore considered that sufficient information has been submitted with the application to form an assessment on the impact of wildlife, and that the imposition of conditions will address any potential impact upon wildlife, especially in terms of noise and disturbance.

7.85 The proposed development involves no new buildings and no changes to ground levels or drainage infrastructure. All access roads, parking areas, and buildings are already in place, and no external alterations are proposed. The application is therefore not

required to demonstrate Biodiversity Net Gain pursuant to the Environment Act 2021. Given the information submitted with the application, it is considered the proposal would not result in an adverse impact upon local wildlife. It is also noted that no lighting is proposed as part of the application but a condition ensuring no additional lighting is installed without prior consent is recommended. Overall, the proposal accords with Local Plan Policy LP30 and Section 15 of the NPPF (2024).

Trees

7.86 Policy LP31 of the Local Plan states a proposal will be required to demonstrate that the potential for adverse impacts on trees, woodland, hedges and hedgerows has been investigated. A proposal will only be supported where it seeks to conserve and enhance any existing tree, woodland, hedge or hedgerow of value that would be affected by the proposed development. Where loss, threat or damage cannot be fully addressed through minimisation and/ or mitigation measures the proposal may be supported if alternative measures such as reinstatement of features, additional landscaping, habitat creation or tree planting will compensate for the harm and can be implemented and established before development starts.

7.87 There are some trees subject to Preservation Orders to the north-eastern access to the site (from Common Lane) and, given the location within the CA, any trees within the site are afforded formal protection. The proposal does not include any works that will affect the trees within the site. The proposal therefore complies with Policy LP31 of the Local Plan.

Development Obligations

Community Infrastructure Levy (CIL)

7.88 The development may be CIL liable in accordance with the Council's adopted charging schedule; CIL payments will cover footpaths and access, health, community facilities, libraries and lifelong learning and education.

Other Matters

Fire Hydrants

7.89 The comments from the Cambridgeshire Fire & Rescue Service requesting a condition for the provision of fire hydrants are noted. It is considered that the principle of a fire hydrant on the site is acceptable in terms of heritage and therefore can be conditioned. This is because the red line for the application is big enough to ensure the fire hydrant is capable of being sited in a less sensitive area within the site. It is also noted that a fire hydrant is low-level

feature, and therefore could also be potentially mitigated in terms of visual impact.

Neighbour concern: Approving this application will create a precedent for future expansion

7.90 Officers and members can only assess what is in front of them. Any future application will be assessed on its own merits and against relevant local and national policy.

Premature reliance on 25/01451/CLED

7.91 This report has been prepared for DMC on the 20th October. The Judicial Review period for 25/01451/CLED is until the 16th October. At the time of writing this report, the Council has not received any challenge to 25/01451/CLED.

Conclusion

7.92 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

7.93 The proposed change of use does not involve any physical alteration or works to the Listed Buildings or any of the curtilage Listed Buildings or structures as part of the proposed development. It is considered that the proposed development will preserve the character and appearance of the Conservation Area, preserve the Ridge and Furrow and will preserve the setting of the Listed Buildings. There will be no harm to the significance of any heritage assets.

7.94 It is considered that the proposal is acceptable in regard to the transport, highways (including highway safety), odour, noise, flood risk, biodiversity and trees.

7.95 While the Local Plan does not contain specific policies that prohibit the loss of a dwelling, in light of the Council's current inability to demonstrate a five-year housing land supply, the loss of a residential dwelling is a material consideration and must be weighed appropriately against the proposal in the overall planning balance.

7.96 Hemingford Park Hall is a country manor house situated in the countryside and is not reflective of the average housing stock. Notwithstanding this, the loss of a dwelling in light of the Council not being able to demonstrate a five-year housing land supply weighs negatively in the balance but carries only limited weight given the loss is of one dwelling which is not average housing stock.

7.97 Against that, there are several benefits to consider. Regarding the heritage benefits, the site is currently within private ownership (residential and agricultural) and the proposed change of use would increase public access to site due to its commercial operation which would better reveal the significance of the heritage assets for the enjoyment of the public. In comparison to the existing residential use, the income generated form the proposed use would contribute directly to the future maintenance and conservation of the estate, providing a sustainable long-term use. Significant positive weight is afforded to both heritage benefits.

7.98 The Planning Statement sets out the following additional benefits:
(a) The applicant will be looking to preferentially employ local retired people to be traffic and noise marshals during events.
(b) Discounts to access the wellness centre, to hire the event facility (and to hire hotel rooms in the future) will be made available to local residents.
(c) Local charities will be given free hire of the event venue for one or two events per year.
(d) Events will not be held at the same time as the Hemingford Abbots Flower Festival but instead coaches will be able to park on the hardstanding next to the barn (future hotel) during the festival, discounts at the upcoming hotel will be made available to flower festival attendees and the parkland itself will be opened to festival attendees.
(e) As well as providing a sustainable economic future for the heritage assets contained on the site and generating jobs in the process, the business plan demonstrates significant economic benefits for local businesses; supporting worthwhile employment especially within small companies and sole traders. The business described in this application will increase trade at the only local pub in Hemingford Abbots and the only local shop in the whole of the Hemingfords (Hemingford Grey), helping to secure the future viability of both, and to pubs and tourist destinations slightly further afield in villages like Houghton.

7.99 The benefits that relate to discounts, free hire and not clashing with other events cannot be taken into account as these cannot be secured through planning conditions. Limited positive weight is also afforded to the potential employment of local retired people to be traffic and noise marshals during events on the basis that the development will generate local employment. However, moderate positive weight is afforded to the economic benefits of the proposal.

7.100 It should be noted that not all proposed developments are entirely without harm or entirely without benefit. Therefore, in reaching a recommendation on the application, Officers have considered the potential harm of the development against the potential benefits of the development. Officers have considered what weight should be

given to each material consideration. This forms the overall planning balance.

7.101 It is considered that the above identified benefits outweigh the loss of a dwelling in this instance. The development is policy compliant in all other regards. The proposal is in overall accordance with the Development Plan and there are no material considerations which indicate that permission should be refused.

7.102 For the above reasons, it is recommended that planning permission be granted in this instance.

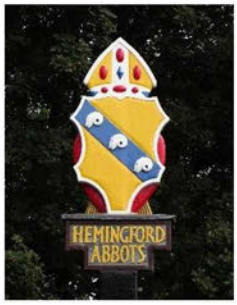
8. RECOMMENDATION - Approval subject to the following conditions;

- Time
- Drawings
- Use class control
- Compliance with Transport Technical Note
- A Noise Management Plan
- Noise condition in line with the NIA.
- Odour Management Plan
- Limit number of events per calendar year
- No events on consecutive weekends
- Limit times of amplified music
- No external amplification
- Delivery and collection times limited
- No fireworks
- No lighting
- No overnight stays outside built form
- Full details of the acoustic barriers
- Hard and soft landscaping plan
- Fire hydrants

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

CONTACT OFFICER:

Enquires about this report to **Lewis Tomlinson, Senior Planning Officer** lewis.tomlinson@huntingdonshire.gov.uk



22nd August 2025

Lewis Tomlinson Planning Officer
Huntingdonshire District Council
Pathfinder House
St. Mary's Street
Huntingdon
PE29 3TN

Dear Lewis

Ref: Planning Application: 25/01248/FUL|Change of use from dwelling (Use Class C3) & agricultural land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking

Hemingford Abbots Parish Council has voted unanimously to recommend refusal for this planning application for the following reasons:

1. Nature of the Planning Application (Descriptor)
The application states "wedding and events venue". This title is repeated in the accompanying 'Design and Access Statement". No details of any events other than weddings are included in the application.

A very similar application was previously submitted in 2021, namely:
(21/01768/FUL|Change of use to allow for a mixed use as private residence (Class C3a), a wedding and corporate events venue (sui generis use) with ancillary guest accommodation and parking)"

There is therefore a reasonable assumption or presumption that there is an intention for events other than weddings to take place on the site, but again no details are provided.

The applicant's representative has verbally stated that the wording used for the planning application is not correct, but the Parish Council is bound to make its decision on what is formally submitted and as stated in the bundle.

On this basis, the Parish Council cannot make a clear determination until there is proper clarification regarding the nature and intent of the application.

2. Traffic / Highway Safety

Parishioners have commissioned their own traffic report which highlights that there are no passing places for traffic between the Lodge gates (at Rideaway) and the Wellness Centre.

In the UK, for commercial use (with regard to single-track rural roads carrying commercial vehicles) the Design Manual for Roads and Bridges (DMRB) provides guidance on layout, including spacing between passing places.

According to DMRB guidance (Volume 2, Clause 3.11.9.1): 'Where forward visibility is unrestricted, passing places should be provided at intervals of approximately 60 m (measured from the end of one to the start of the next), subject to terrain and land tenure considerations.'

Given that coaches and minibuses will be delivering patrons to events via the Lodge entrance, and also 7.5 tonne box vans making deliveries (acknowledged in the application), we are concerned about how road safety will be maintained, also mindful that pedestrians may also be walking on or beside the new track.

The passing location is restricted to a relatively short section of the track, located in front of the gates by the Lodge gates and adjacent to the highway at Rideaway – this section is estimated at only 15 metres in length, and is part of the direct approach to the splay at the junction with the road. If traffic builds up (patrons' arrivals can be expected to peak just before and after the event), we believe that queueing on Rideaway is inevitable, including late at night. This is a road with no footpaths, and frequent foot and equestrian traffic.

Traffic approaching the entrance from the south will be exiting a national speed limit (60mph), with limited visibility due to trees and a significant bend close to the junction with New Road. It is also highly likely that event traffic will approach this entrance from both directions, so it is also possible that the road is blocked both ways for periods of time.

It is believed that the speed measurement quoted in the application "85% decile - 33.3mph" (ref: 2024 change of use application Transport Statement pg7) was taken "in the vicinity of the 20mph speed limit" – this is not the relevant location! The survey was almost certainly conducted close to the splash, which is approximately 200m to the north of the Rideaway entrance where the average speeds will be much higher.

The application states that 45 car parking spaces are available. Given that up to 180 patrons plus staff may be attending at any time, we believe that this will be insufficient and would like to understand where excess vehicles will park. Any event parking on Rideaway would clearly be very dangerous, and any parking in the village would bring disturbance late at night as patrons leave the event(s).

3. Noise

The application states that events have been held with no apparent disturbance measured / recorded at the receptor points.

We are concerned that during events, windows and doors will inevitably be opened, which will significantly increase the sound levels.

The application states that patrons can use the walled garden up to 11pm in the evening, with no active mitigation measures. This, to our knowledge, has not been tested for potential effects on parishioners' amenity. Up to 150 people outdoors in the evening, with alcohol often being consumed, pose a significant potential for disturbance.

The applicant has suggested that locally retired people may be employed using hand-held devices to monitor the sound levels: this is wholly inadequate and unacceptable. The nearby Parish Village Hall uses an automatic sound measurement and suppression system where any amplification is immediately turned off if maximum sound levels are exceeded – which would be a much more effective remedy.

We are also concerned about large numbers of vehicles leaving late at night. The designated car parking areas are only 75 metres from the closest residents' properties, so there will inevitably be repeated light and noise disturbance throughout the year.

4. The New Road

Hemingford Abbots Parish Council and its parishioners have for more than three years repeatedly written to Huntingdonshire District Council regarding the lack of a planning application for this construction, but no reply has ever been received. It is now the subject of a retrospective CLEUD application. To date, the construction has been described as an 'agricultural track', or a 'track agricultural in form'.

This is the Parish Council's first opportunity to query this build, as it has previously been excluded from previous planning applications for the site.

The applicant's pack for the CLEUD acknowledges that a planning application should have been submitted in 2021 after it was largely constructed. We would like to know why Huntingdonshire District Council did not request a suitable application, especially given the repeated prompts from the parish - including an independent report supplied by a Heritage specialist (Pegasus) at the 2024 planning appeal hearing.

Our contention is that the road was built without planning permission, has damaged an important heritage asset (see below), and that Huntingdonshire District Council has failed to act appropriately in acknowledging these concerns in its decision-making (for example, not undertaking any enforcement investigations). We therefore believe that Huntingdonshire District Council should not and cannot grant a CLEUD under 'building for agricultural use', and

then immediately grant extended permission for commercial use as part of this application without addressing the repeated calls for an investigation into potential planning and heritage infringements.

5. Heritage

It is agreed by all parties that the site contains ridge and furrow (various statements made by the applicant and other interested parties in previous planning applications) - this has been built over without any consultation or approval from Historic England or the parish. No planning application was ever submitted for this road / track construction.

The applicant's advisors stated in its Heritage Plan in Sept 2023 (part of the appeal against non-determination of application 23/01749/LBC) that 'the track is of agricultural form' (para 98), and that '..it crosses land in which R&F is evident in aerial photography' (Para 100).

The NPPF requires harm to a heritage asset to be weighed against the public benefits under the provisions of paras 207 to 209.

Hemingford Abbots and Hemingford Park in particular is sited in an important Conservation Area. Any proposal should preserve and wherever possible, enhance features that contribute positively to the area's character, appearance and setting as set out in character statements.

The Conservation area Character Appraisal (2008) notes that where R&F survive it should be valued and preserved. (Ref: Applicant's 2023 Heritage Statement Plan Para 100).

Ridge and Furrow at this site has potentially medieval origins (ref: 2024 Pegasus Report), and is (some of) the best preserved in the district / county.

To repeat again, previous planning applications for this development have excluded the new road / agricultural track, as they have been confined to the red line around the property: e.g., the road /track in question was specifically ruled as being outside the scope of the planning appeal. Therefore, we do not know Historic England's opinions on this, but Hemingford Abbots Parish Council has consistently expressed concerns over damage to ridge and furrow and the importance of its preservation.

In 2024, Huntingdonshire District Council itself recognised the importance of the heritage value of ridge and furrow in the parish in its consideration of an application submitted by 43 Common Lane ('change of use from arable grazing land to residential garden'), where the Conservation Officer stressed the importance of protecting the ridge and furrow that was present. The planning application was subsequently withdrawn.

LP34 refers to "..no alteration of any feature of historic or architectural value.." and again "..cause no harm to the area's special character or appearance..." (ref: the applicant's Design & Access Statement, pages 38-42) - but ridge and furrow we believe has been damaged, and this

damage will inevitably be made worse by the additional traffic and footfall that would result from the approval of this application.

This construction has also altered the original approach to the house and resulted in negative impacts upon its landscape (Pegasus Group report 2024).

Under the NPPF framework, we would like Huntingdonshire District Council to answer the following questions:

- Why was a planning application not sought, as required by concurrent planning regulations, at the time for this build?
- Why have the repeated, written concerns of the Parish Council and its residents not been responded to?
- What public benefits result from the creation of this new road to weigh against the harm identified?

A freedom of information request will be submitted imminently (for the avoidance of doubt, before Monday, 25th August 2025) to seek more information from Huntingdonshire District Council regarding how this potentially unlawful development was managed. Hemingford Abbots Parish Council respectfully suggests that a decision cannot be made on this planning application until this investigation has been completed, as the use of the new road for access to and for servicing the venue(s) is a critical part of the application.

6. <u>Conditions:</u>

Whilst Hemingford Abbots Parish Council strongly opposes this application, if Huntingdonshire District Council were to minded to pass it, we ask that the following conditions be introduced:

a. Installation of an automatic noise measurement and suppression system which will remove power to any amplified music in the event of a breach of noise control
b. Physical marshalling to take place to control traffic entering the site from Rideaway at peak times (for any event hosting more than 40 patrons).
c. Appropriate information and signposting to all guests and contractors so as to avoid any traffic unnecessarily entering the residential area of the village.
d. A clear, published plan for how parking 'overspill' will be managed.
e. The grant of a temporary licence for 24 months during which the commercial use of the site can be monitored for any loss of resident amenity and traffic issues, and corrective actions taken.
f. That large events (defined here as over 50 patrons) can only be held on alternate weekends (which would still allow the target number of 26 events a year to be achieved).

I would be grateful to receive confirmation from you that our recommendation for refusal and the reasons given have been uploaded to the Planning Portal.

Thank you.

Yours sincerely

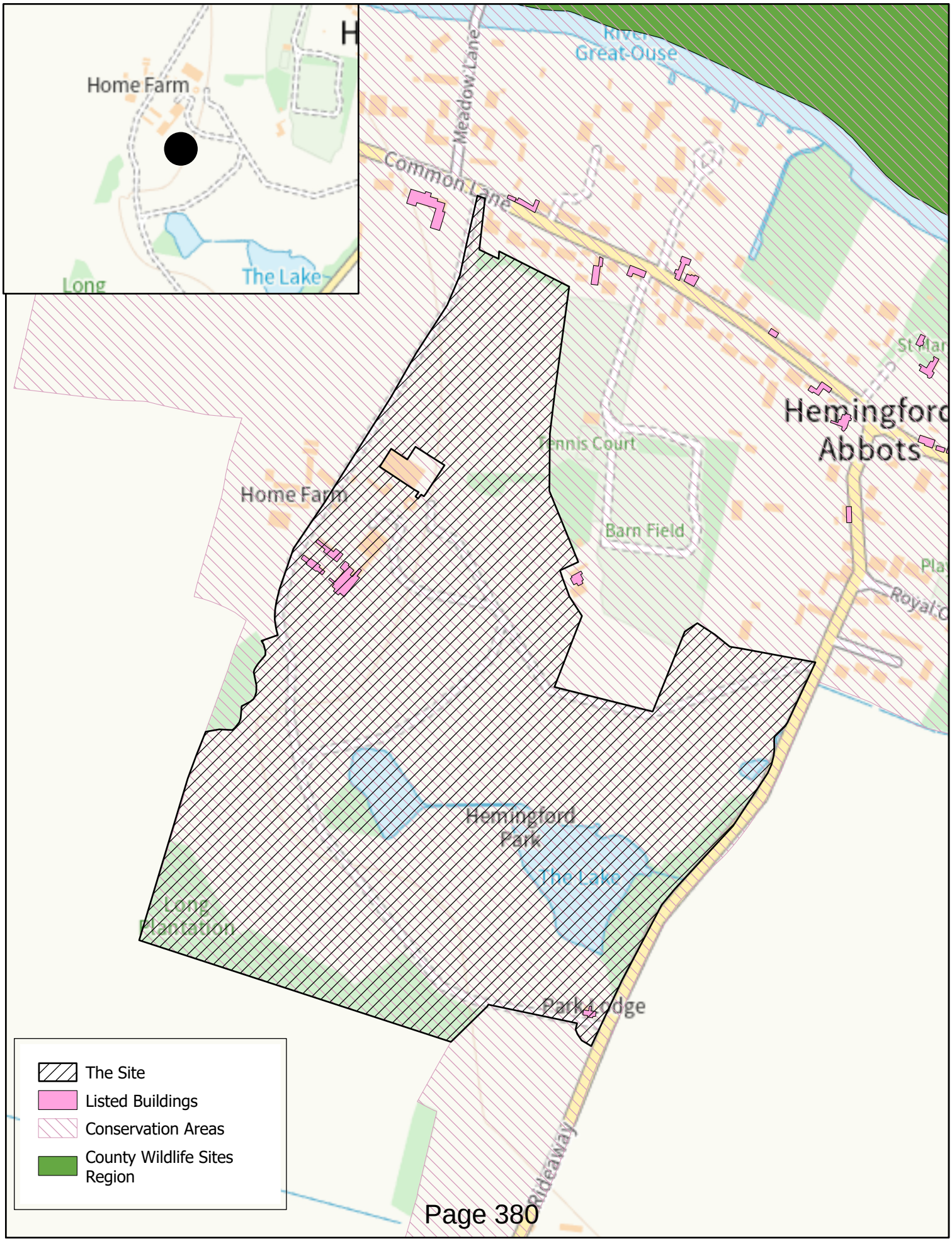


Development Management Committee
Application Ref: 25/01248/FUL

Scale = 1:5,000
Date Created: 10/10/2025

Huntingdonshire DISTRICT COUNCIL

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Issue Status

- SK Sketch	- T Tender	- P Permissions
- D Design	- E Existing Condition	- C Contract

rev	note	date	(drawn by/checked by)
(_) :	Issued for PL	13/07/23	(FA/HC)
(A) :	updated survey information for PL	18/06/25	(GW/HC)

Rideaway

Common Lane

Boundary of application site

HUGH CULLUM
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61b Judd Street
London WC1H 9QT
t 020 7383 7647
f 020 7387 7645
mail@hughcullum.com

Hemingford Park

Proposed Build Drawings
Site Location Plan

1:1250@A1
July 2023

HP004 - PB001 (A)

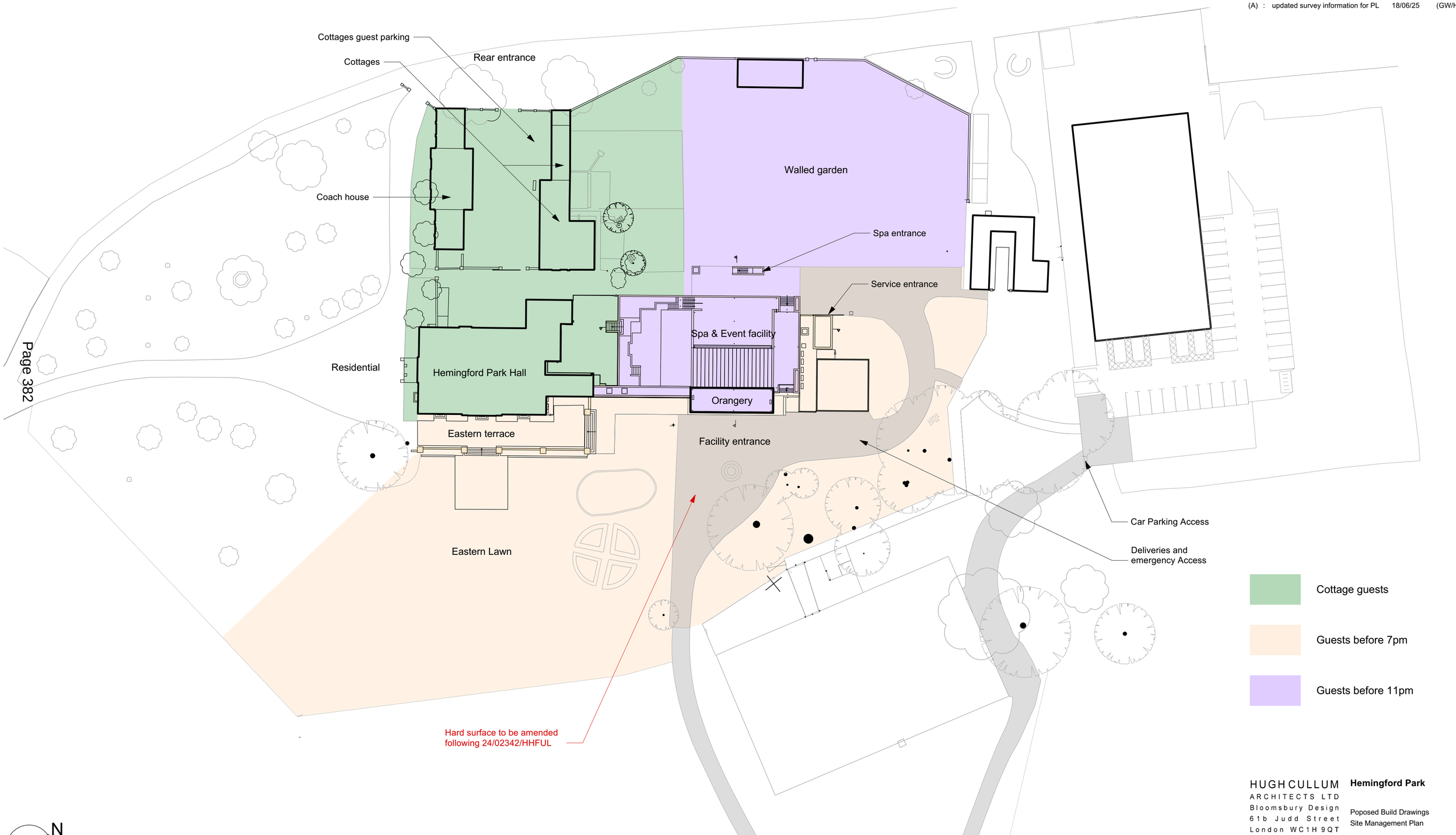
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Hemingford Park

Poposed Build Drawings
Site Management Plan

1:500@A2
July 2023

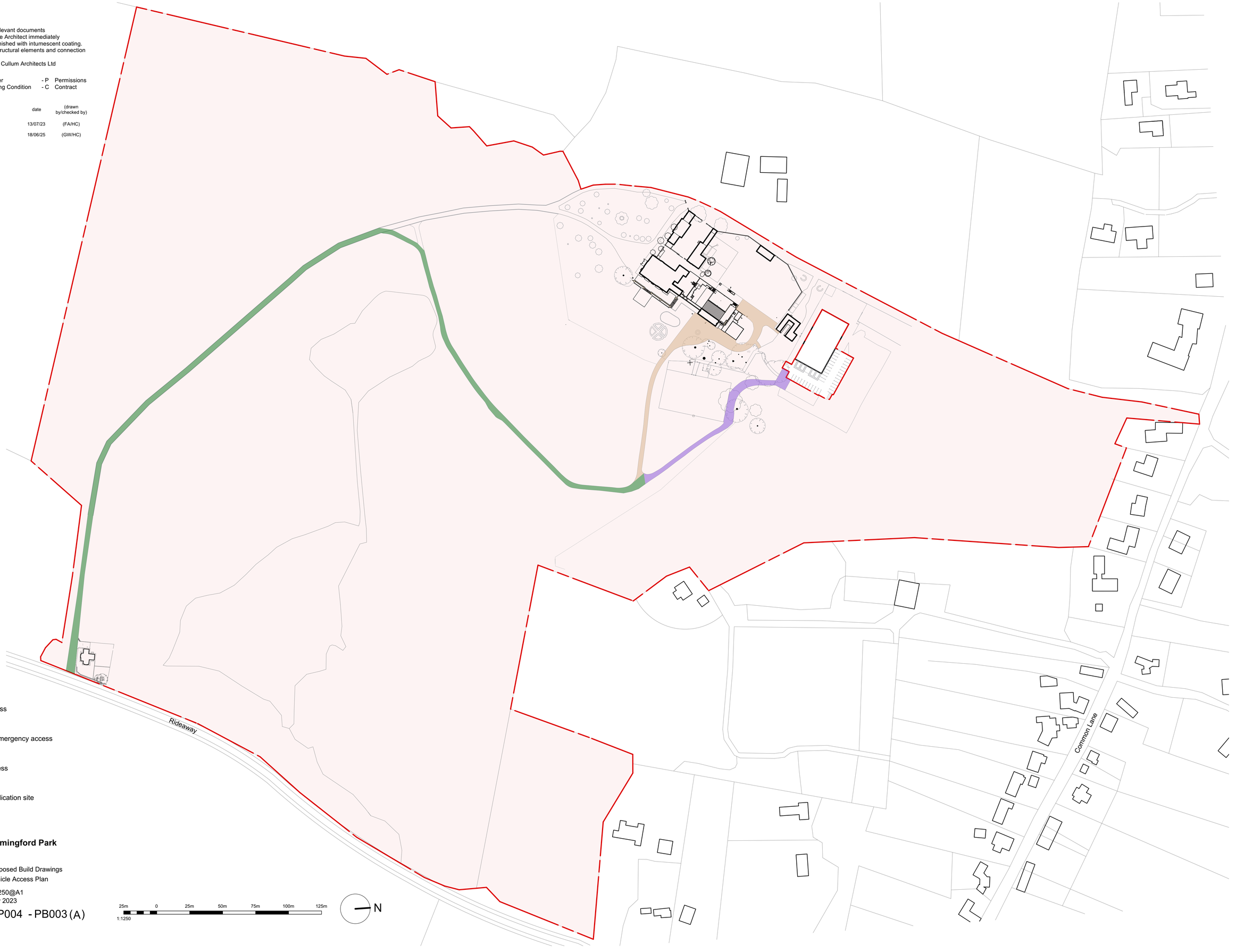
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rev	note	date	(drawn by/checked by)
(_) :	Issued for PL	13/07/23	(FA/HC)
(A) :	updated survey information for PL	18/06/25	(GW/HC)



All vehicles access

Deliveries and emergency access

Car parking access

Boundary of application site

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Hemingford Park

Proposed Build Drawings
Vehicle Access Plan

1:1250@A1
July 2023

HP004 - PB003 (A)

25m 0 25m 50m 75m 100m 125m
1:1250

N

RICHARD BUXTON
solicitors
environmental • planning • public law

Huntingdonshire DC
Planning Department
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

[redacted]
Our ref: HAP2/1

Your ref: 25/01248/FUL

15 September 2025

Attention: Lewis Tomlinson / Clara Kerr

By email only:
lewis.tomlinson@huntingdonshire.gov.uk
development.control@huntingdonshire.gov.uk
clara.kerr@huntingdonshire.gov.uk

+++ Urgent please re committee meeting on 15.9.25 +++

Dear Sirs

Hemingford Park – Application 25/01248/FUL for change of use from dwelling (Use Class C3) & agricultural land to wellness centre (Class E) and wedding and events venue (sui generis)

1. Hemingford Abbots Parish Council has sought our advice about the above development ("**the Proposed Development**") which is intended to be considered by the Planning Committee on Monday 15.9.25. We write urgently, informed by advice from specialist planning counsel, to explain that the matter should not be considered then. We have identified significant flaws in the treatment by Huntingdonshire District Council ("**the Council**") of the effect of the Proposed Development on the medieval ridge and furrow ("**the Ridge and Furrow**"), which is present in the grounds of Hemingford Park Hall, the development site ("**the Site**").

2. You will appreciate that we have been instructed in this matter at a late stage and other issues may arise. The points below are the most obvious, and otherwise rights are reserved.

The Ridge and Furrow

3. The Site encompasses the Grade II* Listed Hemingford Park Hall and its grounds. Hemingford Park Hall is a large country house, set in the extensive grounds of Hemingford Park and located to the southwest of the village of Hemingford Abbots. The parkland of Hemingford Park (which is part of the Site) also falls within the Hemingfords Conservation

Area ("**CA**").

4. The parkland includes extensive, medieval ridge and furrow earthworks. The Ridge and Furrow is a non-designated heritage asset ("**NDHA**") in its own right[1].

5. In addition, the Ridge and Furrow is described in the CA Assessment (2008) as forming part of the character of the CA. The assessment states (p.13) *"Hemingford Park was laid out after 1806 on closes between Rideaway and Common Lane. The preservation of ridge and furrow here indicates that this area was previously arable and most likely part of the settlement's early common field system…Ridge and furrow are now rare in the district and what remains here and on the Eastside Common should be valued and preserved."*

6. Further, a heritage assessment, authored by Claire Gayle MIHBC (a heritage specialist) of Pegasus group and submitted on behalf of the residents of Hemingford Abbots in response to a separate application for development at the Site[2] (§6.48), makes clear that the Ridge and Furrow forms part of the setting of the Hall and contributes to its significance as such. The report states *"the ridge and furrow is an indicator of the long-standing arable practices and is rather part of the designated parkland of the Grade II* Listed Hemingford Park Hall, the retention of the ridge and furrow in the design of Hemingford Park itself suggests the intention by Decimus Burton [the architect] to reinforce the historic origins of the site in views from the main house"*.

Deliberate harm to the Ridge and Furrow

7. In recent years, the Site's owner has unlawfully and deliberately laid an access track which branches off the existing access across the Ridge and Furrow (and then branches again) ("**the Tracks**"). Please see plan attached to this letter – it is the yellow line in particular crossing the Ridge and Furrow which is in contention. This has undoubtedly harmed this NDHA most likely also the significance of the listed building and the character of the CA. Despite repeated requests from the Parish Council and residents to do so, the Council failed to take timely enforcement action in relation to this development. In consequence, the Site's owner applied for a Lawful Development Certificate ("**LDC**"). This was granted on 4 September 2025 under reference 25/014151/CLED under s.191 of the Town and Country Planning Act 1990 ("**TCPA**"). The LDC contains a map showing the precise extent of the Tracks.

8. It is important to note that the Site's owner sought the LDC on two bases: (i) that the creation of the Tracks was lawful pursuant to permitted development rights (something that the Council rejected) and (ii) that the creation of the Tracks was now immune from enforcement action, pursuant to s.171B TCPA and transitional arrangements. The LDC was

[1] See https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MCB10479&resourceID=1000

[2] The Council is aware of this report but for convenience a copy is annexed to this letter.

granted on the second basis only: the Council did not accept that the creation of the Tracks was allowed pursuant to permitted development rights.

The Council's duties in respect of heritage assets

9. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require decision makers to have special regard to the desirability of preserving listed buildings and conservation areas respectively. In practice this means that a decision maker must give *"considerable importance and weight"* to any finding of harm to a heritage asset: ***Bath Society v SSfE*** [1991] 1 WLR 1303. In ***R (Trustees of the Cecil Estate Family Trust) v South Kesteven DC*** [2015] EWHC 1978 (Admin), Holgate J confirmed (§24) that the scope of s.66 was not limited to development of the listed building or its setting, but also embraced development which would have an impact upon a listed building or its setting *"whether direct or indirect, and whether harmful or beneficial, or a mixture of the two"*.

10. The requirements of these provisions are encapsulated in Chapter 16 of the National Planning Policy Framework ("**NPPF**").

11. Non-designated heritage assets have no statutory protection, but are protected by policy, particularly §203 of the National Planning Policy Framework ("**NPPF**"), which states:

> *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

12. The Huntingdonshire Local Plan to 2036 ("**the Local Plan**") goes further than this, however, explaining (in Policy LP34) that great weight and importance should be given to the conservation of all heritage assets (which the glossary confirms includes NDHA)[3].

13. The Court of Appeal has described the application of these policies and provisions as a *"rigorous"* and *"demanding"* duty: ***East Quayside 12 LLP v Newcastle upon Tyne City Council*** [2023] EWCA Civ 359.

The Council's assessment of the effects of the Proposed Development on the Ridge and Furrow

14. It is extraordinary that, despite its obvious significance and the clear requirements of both Policy LP34 of the Local Plan[4] and §207 of the NPPF,[5] the application documents (including

[3] See also supporting text, including at 8.46.
[4] Ibid.
[5] *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting…"*

the heritage assessment) make no reference to the implications of the Proposed Development for the Ridge and Furrow. This is particularly troubling since these are the documents which will have been reviewed by Historic England. It is likely, therefore, that Historic England will have been unaware of the presence of the Ridge and Furrow or of its significance.[6]

15. Regrettably, this lack of interest in the Ridge and Furrow has been adopted by the Council's officer report ("**OR**"), which states as follows on this issue:

> *7.30 Concerns have been raised by the Parish Council and neighbouring properties in relation to the access tracks, and in particular the track that is in situ in front of Hemingford Park Hall. A certificate has been granted under reference 25/01451/CLED which confirms the lawfulness of the tracks. The potential impact of the creation of the tracks on the setting of the Listed Building, the historic parkland/ridge and furrow or the Conservation Area is therefore not something that can be considered given the lawful status of the tracks.*
>
> *7.31 Concerns have also been raised that the proposal would harm the historic setting through increased traffic, noise, lighting, and commercial activity. However, given that the change of use proposal will utilise these tracks as they will provide connectivity from the Rideaway access to the pool and spa building, the hotel approved under 24/01218/P3MPA and the proposed parking area, the use of the tracks as part of the proposal is within the remit of the consideration.*
>
> *7.32 Taking into account the lawful status of the existing tracks, the restriction and control on not only the frequency but also the amount of events (which is discussed in more detail below), and the fact that the increased visitor activity is consistent with the nature of a historic country estate which will also allow access to the heritage assets to members of the public, it is considered that the proposed use of the existing tracks as well as the wider site in conjunction with the proposed use will not be harmful to the setting of the Listed Buildings or the character and appearance of the Conservation Area, or the countryside.*

<u>Significant errors in the Council's assessment</u>

16. As noted above, there are significant errors in the Council's assessment, which will render any grant of planning permission unlawful. These are as follows.

(1) Failure to consider §209 of the NPPF

17. The OR makes no reference to §209 of the NPPF, which states that *"where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision."* The term *"heritage*

[6] Members of Hemingford Abbots Parish Council wrote to Historic England on 28 August 2025, but no response has been received to date.

asset" used here is defined in the glossary to the NPPF and includes NDHA.

18. There is clear evidence of deliberate damage to the NDHA which arises from the creation of the Tracks. In granting the LDC on the basis that it did, the Council accepted that this development was unlawful. It follows that the advice in the OR that the potential impact of the tracks on the heritage assets is *"not something that can be taken into account"* simply because of the LDC is manifestly wrong. Such an approach takes into account the *deteriorated* state of the heritage asset and allows the applicant to benefit from his own wrongdoing in relation to the Tracks. It is therefore contrary to both the terms and clear intention of §209.

19. The failure to carry out any assessment is particularly surprising given the letter of 29.8.25 from David Lock Associates specifically drawing attention to this issue.

(2) Failure to properly consider the implications of the Proposed Development on the Ridge and Furrow

20. The Proposed Development (even as a wedding venue only, let alone with other activities) will undoubtedly lead to a more intensive use of the Site than the existing private residential use. Whether or not this is consistent with the nature of a historic country estate (as vaguely asserted in the OR), it is undoubtedly different from the *current* use. In and of itself, this more intensive use could lead to harm to those parts of the Ridge and Furrow which are not already harmed by the Tracks, for example by (i) increased walking on them (ii) other development that could be carried out on them pursuant to permitted development rights associated with the new use and (iii) any change of use under the Town and Country Planning (Use Classes) Order 1987. These potential effects have been completely ignored by the OR, which has focused exclusively on the Tracks.

21. Moreover, even if the OR was (contrary to the above) entitled to disregard the effects of the Tracks themselves as originally laid, it was plainly not entitled to disregard the effects of future *use* of the Tracks occasioned by the Proposed Development on the Ridge and Furrow. The Design and Access Statement makes clear that access to the Site will be taken via Rideaway, from which the Tracks emanate via the historic/existing access. Indeed, it is understood that the Tracks will be used by wedding traffic. This use will be far more frequent and intensive than the existing domestic use: for example, it is estimated that there will be 26 weddings a year, each hosting 180 guests. In addition, the Tracks (as defined on the LDC) are not wide enough for two vehicles (even cars, let alone larger vehicles) to pass. Given the length of the Tracks, it is almost inevitable that vehicles looking to pass one another will be driven off the Tracks and onto the Ridge and Furrow causing further damage beyond the scope of the LDC. Alternatively, if passing places were required, this would further damage the Ridge and Furrow (and be outside the scope of

the LDC). A further problem may relate to unlawful fencing[7].

22. As noted above, the Ridge and Furrow contributes to the significance of the listed building, the character of the CA and is an NDHA in its own right. The failure by the OR to properly assess these potential impacts of the Proposed Development on it is a significant omission and is clearly contrary to the Council's obligations under the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and the Local Plan.

(3) Premature reliance on the LDC

23. Considering the two significant errors identified above, the Council's Planning Committee ought to refuse the application for the Proposed Development. Not to do so would in our opinion be unwise: it would be unlawful and open to judicial review challenge. However, failing this, the committee should at the very least adjourn its consideration until such time as the LDC is immune from legal challenge.

24. As noted above, the LDC was granted on 4 September 2025. Thus, the time limit for bringing a judicial review of the Council's decision to grant it does not expire until 16 October 2025. In view of the short timeframe available to us, we have not been able to consider the lawfulness or otherwise of the LDC. However, on the information we do have, significant questions arise.

25. The OR places significant reliance on the LDC. This is wrong in any event for all the reasons given above. However, if the LDC is challenged and subsequently quashed it will plainly have a material bearing on the advice contained within the OR. As a minimum, therefore, the Council should adjourn any determination of this application until after 16 October, by which time it will know whether or not the LDC is going to be challenged.

Conclusion

26. The approach to the Ridge and Furrow in the OR is fundamentally flawed and unlawful for the reasons given above. The application should therefore be refused. Failing this, at the very least the determination of the application should be adjourned until after 16 October to allow for any potential legal challenge to the LDC.

Yours faithfully

[redacted]

Richard Buxton Solicitors

[7] This is discussed in the Gayle/Pegasus Report of 21.2.24 - see paragraph 6.57.

ORIGINAL ROAD

NEW ROAD ACROSS RIDGE & FURROW



Third Party Representation.

Hemingford Park Hall, Hemingford Park, Common Lane, Hemingford Abbots, PE28 9AS

Retention of pool building, basement car park, lift and enclosure, external courtyards, pond and associated hard and soft landscaping (revised siting), phased alterations to pool building (reduction in height), removal of staircase, removal of glazed balustrade to pond and alterations to fenestration of main facade of pool building."

On behalf of residents of Hemingford Abbots

Date: 21st February 2024 | Pegasus Ref: P24-0393

LPA Refs: 23/01739/HHFUL and 23/01749/LBC
LPA Refs (alternative): 24/00003/NONDET and 23/00040/NONDET
PINS Ref: APP/H0520/W/23/3335991 and APP/H0520/Y/23/3335992

Author: Claire Gayle B.EnvD, MSc, MA, IHBC

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Appendices

Appendix 1: 14/00578/FUL and 14/00579/LBC Decision Notice and Delegated Report

Appendix 2: 14/00578/FUL and 14/00579/LBC Approved Drawings

Appendix 3: 22/02452/LBC Historic England Comments

Appendix 4: Legislation and Planning Policy

Appendix 5: Methodology

Appendix 6: Hemingford Park Hall List Entry

Appendix 7: Conservation Area Analysis Map

1. Author's Background

1.1. My name is Claire Gayle. I am a full member of the Institute for Historic Building Conservation (IHBC). I have a Bachelor of Environmental Design, a Master of Science in Historic Building Conservation and a Master of Arts in Archaeological Practice. I have over eleven years' experience working in the heritage sector.

1.2. I have acted as a heritage consultant on numerous large-scale developments in England, both on behalf of developers and reviewing their work for other parties. I provide advice to clients on heritage assessments and planning strategy. My role necessitates close liaison with heritage stakeholders such as Historic England and Local Authority heritage officers.

1.3. The assessment of the significance of heritage assets, and important elements of their setting, is an area which I have particular expertise. I have completed many specialist assessments of historic buildings (both designated and non-designated), and their settings. I have also undertaken many specialised assessments of Conservation Areas, including those for development within Conservation Area and in proximity to their boundaries.

1.4. I have been employed by Pegasus Group since September 2017, and my position is that of Associate Heritage Consultant.

1.5. The evidence which I have prepared and provided for this appeal in this Statement is true and has been prepared and given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true professional opinions.

2. Appeal Background, Key Issues and Case Summary

2.1. This Appeal Representation has been prepared following the non-determination of Householder Planning Permission and Listed Building Consent by Huntingdonshire District Council (HDC) and the subsequent appeals for the regularisation of the as-built spa extension, the creation of a new access drive and other works at Hemingford Park Hall, Hemingford Park, Common Lane, Hemingford Abbots, PE28 9AS (HDC Refs: 23/01739/HHFUL & 23/01749/LBC).

Approved Applications 14/00578/FUL and 14/00579/LBC

2.2. In 2014, applications were submitted and granted for the following development:

> ***"Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds."***

2.3. This application established the in-principle acceptability of a pool house extension to the north of the main Listed Building to replace an existing outbuilding.

2.4. The Decision Notice and Delegated Report can be found in ***Appendix 1***. The approved plans and elevations can be found in ***Appendix 2***.

Withdrawn Application 22/02452/LBC

2.5. A previous Listed Building Consent (LBC) was submitted alongside an application for non-material amendment (NMA) to regularise the as-built spa, which had deviated from the approved development. The NMA was refused and the LBC was subsequently withdrawn. Historic England provided comments on the acceptability of the as-built extension, ultimately concluding the extension would result in 'less than substantial harm.' The response can be found in ***Appendix 3***.

Non-determined applications 23/01739/HHFUL & 23/01749/LBC

2.6. The applications which are the subject of this appeal were received by HDC on 18th September 2023 and supplemented with information until 13th October 2023. The applications were never validated and thus appealed on the basis of non-determination.

2.7. These applications were for the retention of the as-built extension with some alterations. The description of development read:

> ***"Retention of pool building, basement car park, lift and enclosure, external courtyards, pond and associated hard and soft landscaping (revised siting), phased alterations to pool building (reduction in height),***

removal of staircase, removal of glazed balustrade to pond and alterations to fenestration of main facade of pool building."

2.8. The elements of the as-built pool building which this appeal seeks permission for are listed in Section 4 of this report.

2.9. The submitted Heritage Statement prepared by Jon Lowe Heritage concluded that the proposals would result in 'no harm' to the significance of the Grade II* Listed Hemingford Park Hall or the Hemingfords Conservation Area. I disagree with the findings of the submitted Heritage Statement, as set out in Section 5 of this report.

Key Issues

2.10. The issues addressed within this statement are as follows:

- Should the applications have been validated?
- What is the significance of the Grade II* listed Hemingford Park Hall, including the contribution of its setting?
- What impacts do the proposals have on the significance of the Listed Building, whether that be beneficial, harmful or neutral?
- What is the significance of the ridge and furrow within the site?
- What impacts do the proposals have on the significance of the non-designated heritage asset, whether that be beneficial, harmful or neutral?
- What is the significance of the Conservation Area?
- What impacts do the proposals have on the significance of the Conservation Area, whether that be beneficial, harmful or neutral?

Summary of My Case

2.11. HDC was correct in not validating the applications by virtue of the lack of clarity of what the proposals included. There are inconsistencies in supporting statements which make reference to proposals for the change of use of the site, and the revised Site Location Plan includes the proposed access track. Whilst the Appellant's Statement of Case is clear as to which proposals they are considering, the submission documents tell a different story, and HDC would not have been able to validate the applications until the scope of the proposals was understood, especially given some of the proposals mentioned, such as the Change of Use would require an application for full Planning Permission and not Householder Planning Permission.

Hemingford Park Hall

2.12. The appeal proposals are not sympathetic to the character and significance of the Grade II* Listed Building and would result in 'less than substantial harm' through a change in setting. There has been no submitted justification for the changes to the as-built structure from the 2014 approvals.

2.13. The proposed access track has not been addressed within the Appellant's Statement of Case, but has been included within the submission and justified in the Heritage Statement by the change of use of the site, which does not form part of the Appeal proposals. This element of the proposals results in harm to the significance of the Listed Building through the alterations to the original approach to the house and the negative impacts upon its landscape, including the destruction of ridge and furrow.

2.14. No public benefits have been provided to weigh against the harm identified.

Non-designated Ridge and Furrow

2.15. The ridge and furrow earthworks on the site are considered a non-designated heritage asset by virtue of their potentially medieval origins and their group value with other earthworks around the village. The proposals for the new access track have resulted in irreversible loss of a localised area of the ridge and furrow within Hemingford Park, which was purposely retained in the design and layout of the parkland. This results in harm to the significance of the non-designated heritage asset.

2.16. No public benefits have been provided to weigh against the harm identified.

Hemingfords Conservation Area

2.17. The proposals result in a poor-quality design in comparison with the originally approved 2014 proposals. The proposed form of the pool house does not exhibit the architectural qualities expected within the locality, nor does it relate to its high-quality host building any longer. Furthermore, the localised loss of the ridge and furrow, which is identified as an important feature within the Conservation Area, results in a negative impact to its significance. Whilst it is accepted that the proposals only form a small part of the Conservation Area, they have eroded the quality of the Conservation Area in this location. Therefore, the proposals will result in 'less than substantial harm' to the significance of the Hemingfords Conservation Area.

2.18. No public benefits have been provided to weigh against the harm identified.

3. Assessment of Heritage Matters

Legislation and Planning Policy

3.1. Details of the heritage legislation and planning policies which are considered relevant to this Appeal are provided at ***Appendix 4***.

Methodology

3.2. The full methodology utilised in the preparation of the assessments which are set out within this Statement is provided at ***Appendix 5***.

Benefits

3.3. The PPG states that public benefits include heritage benefits and clarifies that works to listed buildings in private ownership can equate to public benefits where they secure their future as designated heritage assets. The full policy context is provided in ***Appendix 4*** of this Statement. A recent High Court Decision has confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 207 to 209.[1]

3.4. Consequently, sensitive, conservation-led repair and refurbishment works to a private listed property can genuinely be considered public benefits where they sustain or enhance the significance of the asset, reduce or remove risks, and support its long-term conservation, especially by ensuring the asset gains or retains a viable use.

[1] Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); DLUHC, *NPPF,* paras. 207 and 209.

4. The Proposals

4.1. The Appellant's Statement of Case prepared by Artisan Planning and Development Consultants lists the following elements which form the appeal proposals:

- Retention of the as-built pool house, basement car park and lift and associated hardscaping and landscaping in its current position approximately 5.3m further north from the Grade II* Listed Building;
- Alterations to the fenestration of the main façade of the pool building;
- Reduction of pool house height by 400mm;
- Removal of the external spiral staircase from the north elevation of the pool building to remove the potential use of the roof as a roof terrace;
- Removal of the glazed screen from the landscaped pond; and
- Retention of the increased height of the west wall (to within the walled garden) between 1m and 1.5m and variation to internal plan form and levels.

5. Non-determination of the Applications

5.1. As mentioned, the applications for Householder Planning Permission and Listed Building Consent were originally submitted on 18th September 2023, supplemented with information until 13th October 2023 and were ultimately not validated by HDC.

5.2. The submitted Planning Statement prepared by Artisan Planning and Development Consultants[2] lists the following elements which form the application proposals:

- Retention of the as-built pool house, basement car park and lift and associated hardscaping and landscaping in its current position approximately 5.3m further north from the Grade II* Listed Building;
- Alterations to the fenestration of the main façade of the pool building;
- Removal of the external spiral staircase from the north elevation of the pool building to remove the potential use of the roof as a roof terrace;
- Removal of the glazed screen from the landscaped pond; and
- Retention of the increased height of the west wall (to within the walled garden) between 1m and 1.5m and variation to internal plan form and levels.

5.3. However, both the submitted Design and Access Statement (DAS) prepared by Hugh Cullum Architects Ltd. and the submitted Heritage Statement prepared by Jon Lowe Heritage make reference to the following proposals:

- Change of use of the site from Class C3(a) to mixed Class C3(a) and sui-generis as a wedding and events venue; and
- Creation of an additional access drive within the site.

5.4. Page 2 of the DAS states that the document is to support applications for:

> ***"Retrospective permission for the construction of two storey submerged pool house/orangery, roof terrace, external courtyards, pond and associated hard and soft landscaping (retrospective and use for a mixed use as private residence (Class C3(a)), wedding and events venue (sui generis use), and commercial spa (sui generis use) along with associated access works to the entrance from Rideaway."***
>
> ***"Permission for change of use of part of the garden area of Hemingford Park Hall to allow a mixed use as private residence (Class C3(a)) and a wedding and corporate events venue (sui generis use) associated with the use of the pool house/orangery. Change of use of agricultural access track and hard standing area to allow for mixed use of agricultural and***

[2] Artisan Planning and Development Consultants. *Planning Statement* (September 2023). p. 5.

commercial use associated with the use of the pool house and orangery."[3]

5.5. Similarly, the Heritage Statement makes reference to the same descriptions of development as per above[4].

5.6. Whilst the Appellant's Statement of Case does not discuss the above proposals, the access drive has been implemented, and thus forms part of the soft/hard landscaping mentioned within the description of development. The inclusion of this element of the proposals is also reinforced by the submission of a revised Site Location Plan on 13th October 2023, which included the new drive.

5.7. Notwithstanding the above, the change of use mentioned throughout these documents would have required an application for Full Planning Permission.

5.8. The application proposals also included plans and photos of the Grade II Listed Park Lodge and the Grade II Listed Stables and Coach House although these elements fell outside of the Site Location Plan.

5.9. Therefore, there are clearly significant disparities between application documents, and it is only reasonable that the applications were not validated without an adequate understanding of the scope of the proposals and whether the documents submitted were sufficient for the application types, or that the correct applications were submitted.

[3] Hugh Cullum Architects. *Design and Access Statement* (July 2023). p.2.

[4] Jon Lowe Heritage. *Heritage Statemen*t (July 2023). p.4.

6. Historic Environment

Historic Development and Map Regression

6.1. The earliest cartographic source to depict Hemingford Park Hall is the 1888 Ordnance Survey Map (Plate 1). This map shows the site predominantly undeveloped, with only the original access drive and boundary walls to the walled garden within the boundary. In addition to the main house, the outbuildings, including the lodge to Rideaway, are present within this map. An important characteristic to note within this map is the lack of any development or formal planting within the centre of the parkland. Whilst there are earthworks in the form of mounds and considerable vegetation along Rideaway and the estate boundaries with the adjacent farmland, the parkland in which the house overlooks, is predominantly devoid of formally laid out planting or other features. The driveway also swoops around the southwestern part of the site leading to the main house at an oblique angle. This may have given filtered glimpses of the house between the pond and lake from close to the entrance lodge, which may have been a designed view. There is no other formal access to the house indicated on this map.

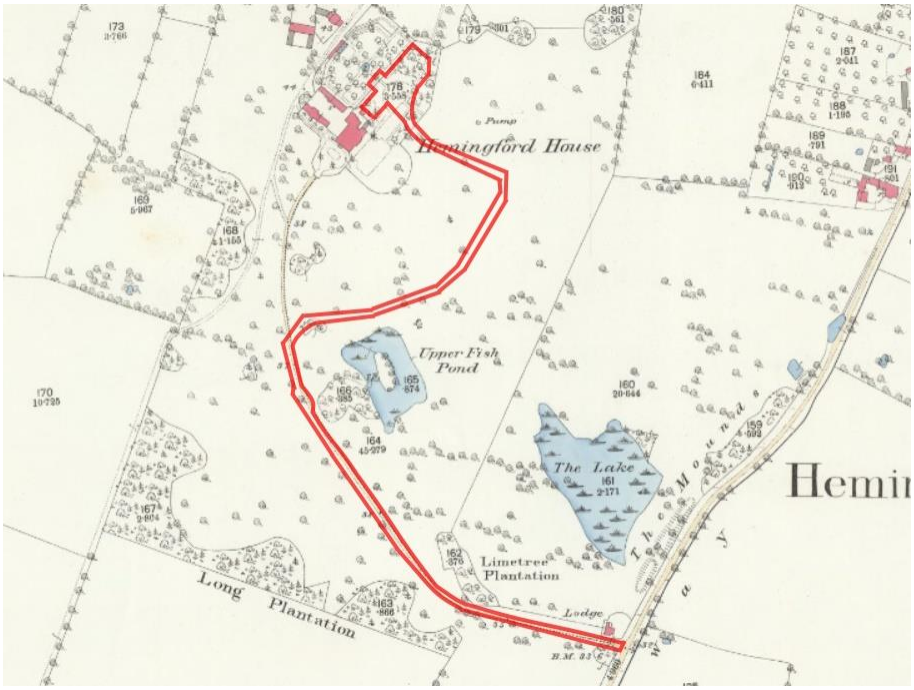


Plate 1: 1888 Ordnance Survey Extract with appeal site boundary roughly in red.

6.2. The 1901 Ordnance Survey Map, however, shows an additional access from Rideaway along a northern plot boundary to approach the house from an oblique angle to the opposite side of the existing access (Plate 2). This new access also runs to the cricket pavilion which had been erected in 1897 and was purpose-built for gentlemen staying at Hemingford Park. The wider parkland appears to have been subdivided into further plots, but it is not clear if these were delineated by boundary treatments.



Plate 2: 1901 Ordnance Survey Extract with appeal site boundary roughly in red.

6.3. There were no changes of note indicated on Ordnance Survey maps throughout the 20th century. The aerial imagery from 2003 shows the original access route still in use with the parkland only further subdivided to the north when the Cricket Pavilion went into separate ownership (Plate 3). Nonetheless, the remaining parkland was not visibility subdivided with boundary treatments, nor changed substantially from its original composition. The ridge and furrow is evident within this image.



Plate 3: 2003 Aerial imagery (Source: Google) with appeal site boundary roughly in red.

6.4. By the 2018 Aerial imagery, the parkland closest to the house was segmented by fences (Plate 4). The historic access track via the cricket pavilion was also being utilised for the construction of the 2014 spa extension (14/00578/FUL and 14/00579/LBC).



Plate 4: 2018 Aerial imagery (Source: Google) with appeal site boundary roughly in red.

Grade II* Listed Hemingford Park Hall

6.5. Hemingford Park Hall was first added to the National List at Grade II* on 23rd October 1951 (NHLE: 1330770) and the List Entry was amended on 4th November 1982. The List Entry describes the building as follows:

> ***"HEMINGFORD ABBOTS RIDEAWAY 1. 5140 (west side) Hemingford Park Hall (formerly listed as The Hall) TL 27 SE 6/16 24.10.51 II* GV 2. 1842-43. Built for Rev J Linton by Decimus Burton. Yellow brick country house. Hipped slate roof with modillion eaves cornice and central pediment to west. Two-storeys. Three window range of hung sashes with glazing bars. Slightly projecting central bay with flat-roofed portico with pilasters and two columns of Doric order. Central double doors with rectangular fan light and side lights. Modern terrace to right hand. Interior has open string stair of turned balusters with guilloche band add egg and dart moulding to string support and arcade of Doric columns. Two pilasters and two columns of Composite order in arcade at landing. Original doors, cornice mouldings, and central lamp bosses. Rear stair-case intact. Source Colvin."***

6.6. A full copy of the List Entry is included at ***Appendix 6***.

6.7. Hemingford Park Hall is a creamy yellow gault brick building which is two storeys in height with a slate hipped roof. The southeast elevation has a central gable and tripartite window arrangement within the central bay and is framed by three windows at each level to either side (Plate 5). The flank/southwest elevation again has a central gable with a ground floor portico with Doric columns and pilasters over the centrally-positioned entrance. There is a single window above and single windows to either side of the entrance at both levels (Plate 6).

6.8. The rear/northwest and flank/northeast elevations have a less formal appearance by virtue of the presence of outbuildings and the access to the former stables.

6.9. Internal access has not been possible for the purposes of this assessment; however, based on marketing information, it is clear that some historic elements of the interior remain, including the main stair hall with guilloche band egg and dart moulding, an arcade of Doric columns and a three-centered recess with a fanlight to the entrance lobby (Plate 7).



Plate 5: Southeast elevation overlooking the parkland (Source: https://www.horseandhound.co.uk/features/hemingford-abbots-cambridgeshire-property-for-sale-798253).



Plate 6: Principal entrance (Source: Extract from https://www.youtube.com/watch?v=xhwVqWk4bzw).



Plate 7: Stair hall (Source: Extract from https://www.youtube.com/watch?v=xhwVqWk4bzw).

6.10. The two principal, formal elevations (southeast and southwest) are seen on the approach to the building up the historic drive, although the southwest elevation is only seen within the estate, whilst the southeast elevation can be glimpsed in distant views from Rideaway or in private views from adjacent residences, such as the Cricket Pavilion (Plate 8-Plate 10).



Plate 8: View along Rideaway from the south over the entrance drive with the hall visible over the hedge.



Plate 9: Glimpses along Rideaway through vegetation towards the main house.



Plate 10: The main house seen from the alternative access from Rideaway.

6.11. Views from the building overlook the parkland with some, notably those from the southwestern elevation, also including the wider rural landscape (Plate 11 and Plate 12). Views across the parkland from the southeastern elevation are largely enclosed by the surrounding vegetation. Despite the close proximity of the village, it does not appear to be readily apparent from the Listed Building.

6.12. Not much is known about the country house landscape work done by Decimus Burton generally, but his urban park work demonstrates his affinity for the Picturesque. The retention of the ridge and furrow is a significant point and demonstrates the intention for it to be experienced in views from the main house. Picturesque landscapes often celebrated the functionality of the landscape, reacting against smooth lawns and introducing texture.



Plate 11: View from the ground floor of the house across the landscape (Source: Extract from https://www.youtube.com/watch?v=xhwVqWk4bzw).



Plate 12: View across the entrance drive with the agricultural fields outside of the building visible beyond the state boundary (Source: Extract from https://www.youtube.com/watch?v=xhwVqWk4bzw).

Statement of Significance

6.13. The Grade II* Listing of the building highlights it is a heritage asset of the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of the Hemingfords Conservation Area.

6.14. The heritage significance of Hemingford Park Hall is principally embodied in its remaining physical fabric of the original Neo-Classical design and the historic associations with architect Decimus Burton.

6.15. Historic interest is derived from the general age and form of the building, which is a good example of a modest Neo-Classical country house on the edge of a settlement but not replacing any earlier dwelling. The associations with architect, Decimus Burton, who is well-known for his contributions to urban planning and speculative developments, including parks, also attributes interest to the property.

6.16. The architectural interest of the house is manifested in the overtly Neo-Classical appearance and decorative elements. These include the use of local gault cream brick and the complementary plaster detailing to the exterior and the internal decorative elements, such as the Doric arcade within the stair hall, fireplaces, plasterwork and architraves.

Contribution of Setting

6.17. The setting of Hemingford Park Hall also contributes to its significance, although the significance derived from its setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance are summarised below:

- Remaining elements of the formal garden curtilage of the house, including any historic garden walls or structures.
- The Grade II Listed Stables and Coach House to Hemingford Park, which were purpose-built to serve the house and thus create group value through the shared functional relationship.
- The Grade II Listed Park Lodge, which acted as the original entrance lodge to the estate's only access from Rideaway.
- Rideaway, the principal, historic thoroughfare leading into the village from Via Devana (now the A1307) and the route with the only access points to the hall. Consequently, it is from this road that aspects of the architectural interest of the building can be glimpsed from the public realm.
- The Grade II Listed Cricket Pavilion, which was built to be ancillary to the Hall and where visitors of the hall, including famous cricketers, played.
- The parkland, which was designed in conjunction with the main house on former agricultural land. This includes ponds, access routes and intentional tree planting along estate boundaries, but of particular interest is the retention of the ridge and furrow across the parkland. The designed curving access drive, which may have given a glimpsed reveal of the house between the pond and lake, across the sweep of parkland.

6.18. There are of course many elements of the setting of Hemingford Park Hall which make no contribution to its significance or detract. Neutral elements of setting include modern landscaping and planting and the additional agricultural buildings to the north. Negative elements include the unauthorised boundary treatments which disrupt views across the landscape.

Impact Assessments

6.19. The appeal proposals will be assessed against the significance of the Grade II* Listed Building below.

Retention of the as-built building 5.3m from the Listed Building

6.20. The pool house has been built in a different position from the proposals approved in 2014 and it has also changed its form and height. The internal changes, such as alterations to the internal plan form and levels and the incorporation of a subterranean car park, will not be discussed here, as the significance of the Listed Building would not be sensitive to these changes. However, the revised position of the extension, its increased height and its overall changes in form will be discussed.

6.21. Firstly, the proposed pool house has been sited further away from the main Listed Building than previously approved. Plate 13, an extract from the Proposed Block Plan, shows a green dotted line where the original approval was sited. Plate 14 and Plate 15 show the approved and proposed front elevations, again with the approved shown in a green dotted line on the appeal proposals.

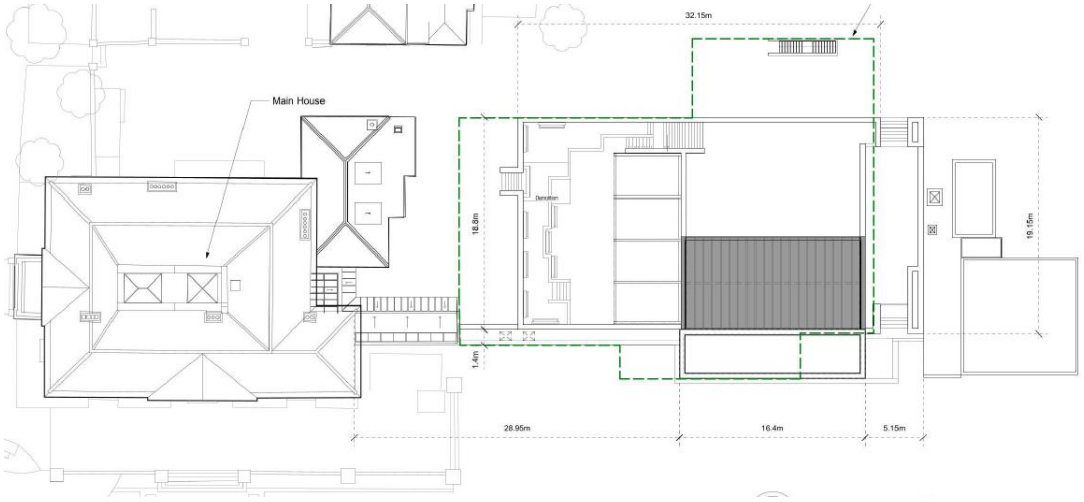


Plate 13: As proposed site plan with the approved 2014 footprint in the green dotted line.

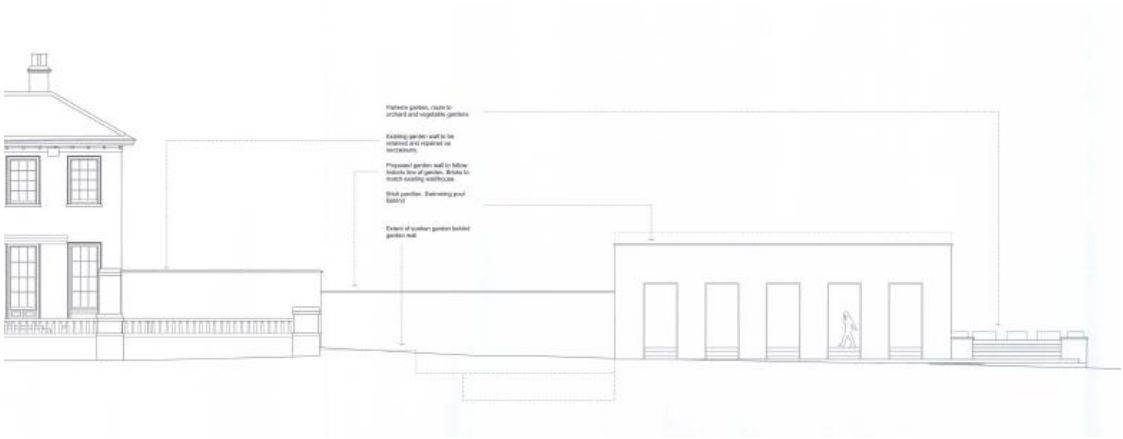


Plate 14: Approved 2014 elevation.

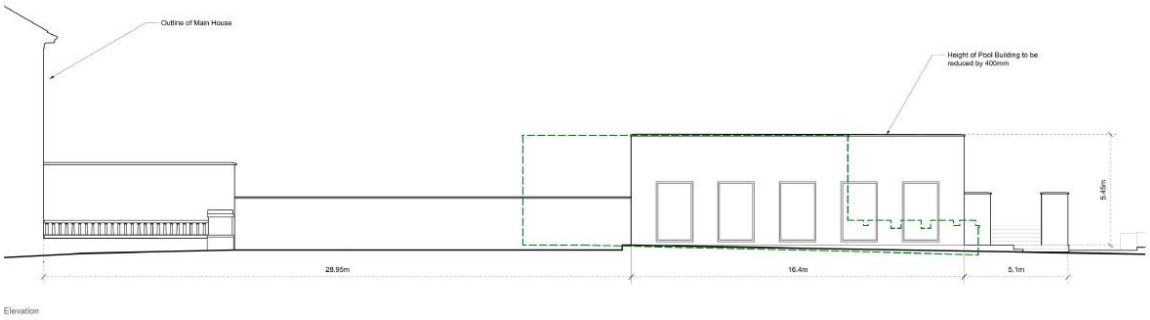


Plate 15: Currently proposed elevation.

6.22. It is clear that the most notable difference in the revised siting is the extent of the brick wall between the main dwelling and the pool house. As a result of its length, it has become a more noticeable new feature on the site in its own right. Whilst the incorporation of recesses within the wall in reality (Plate 16) has broken up its perceived mass and eases this visual impact, this is not depicted on the drawings. Moreover, confirmation of the height of the wall should be noted on the drawings, as there appears to be a discrepancy between what has been constructed and what is depicted, and there are also differences in ground levels depicted in the approved 2014 elevation and appeal elevation. The inconsistency in this information does not allow for an accurate assessment, and therefore, at present the appeal proposals as drawn lack the information to determine their acceptability in heritage terms.



Plate 16: 2024 image of the as-built pool house and wall.

6.23. HDC and Historic England have not raised issue with the principle of siting the pool house in this position, but the Appellant states that the revised position would result in an enhancement due to the increased distance between the buildings and that *"the greater length of wall garden is beneficial and better reflects the historic arrangement of enclosure."*[5]

6.24. I disagree with the above statement in that the proposed wall between the pool house and main house would not result in any kind of enhancement, regardless of its accurate depiction in drawings and subsequent acceptability in heritage terms. Whilst the Inspector may come to the conclusion that the revised siting of the pool house and the increased length of wall would result in 'no harm' to the significance of the Listed Building, the increased length of wall would not result in an enhancement to this significance. Whilst views from a similar position of Plate 16 would have included the garden wall suggested in historic mapping and as referred to by the Appellant, this was set further back than the proposed wall being discussed. The historic garden wall would have also been framed by planting as depicted on historic maps and its overall impression in the view would have been very much a background element with the main house being the focal point of the view (Plate 17). Thus, the revised siting would not be considered an improvement upon the previously approved proposal.

[5] Artisan Planning and Development Consultants. *Appeal Statement of Case* (December 2023). p. 18.

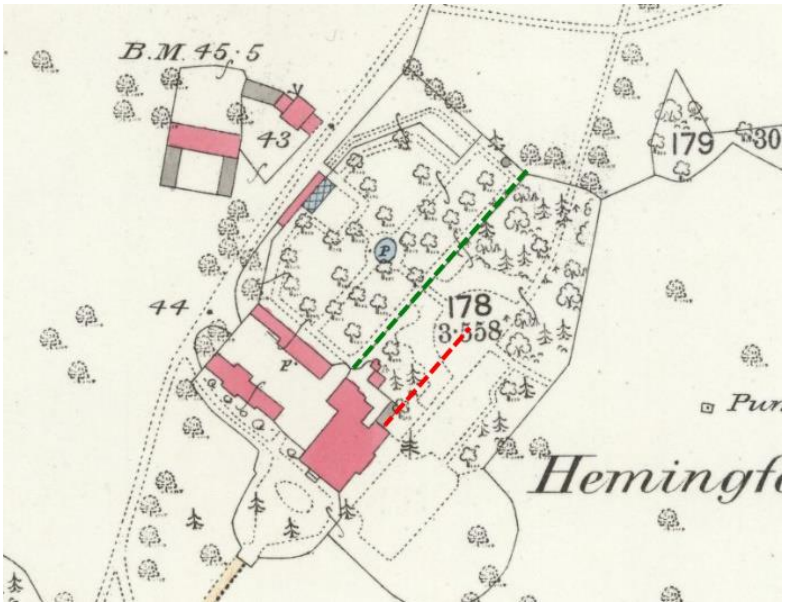


Plate 17: 1888 Ordnance survey extract with the historic garden wall noted in green and the line of the extended link wall in red - not drawn to its proposed length, but rather, indicatively.

Alterations to the fenestration of the pool building

6.25. The elevations in Plate 18 and Plate 19 show the differences in the appearance of the fenestration of the pool house, with the currently proposed openings having a squatter appearance with evident window frames. The originally approved proposals in 2014 had these openings without any glazing into an open portico (Plate 20). The openings were also slenderer than the as-built/proposed, which gave the pool house a sense of verticality and elegance, which was emphasised by the steps within each opening. The incorporation of the portico was a contemporary interpretation of a Classical portico, but also a transition between the exterior garden and parkland and the interior of the new pool house. This transition emphasised its relationship with the grounds of the house and its use as an ancillary building. This allowed the main Grade II* Listed dwelling to remain the prominent domestic element within views. As such, the as-built/proposed represents a more harmful element than that consented.

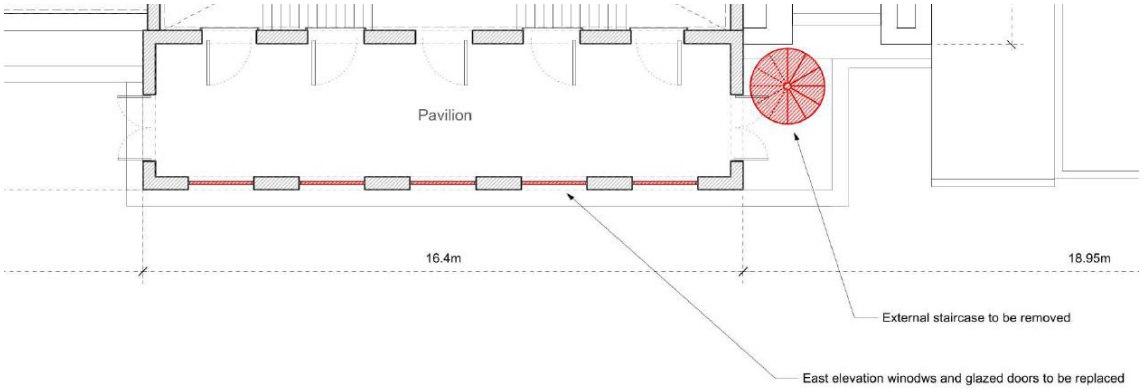


Plate 18: Extract from the existing ground floor plan.

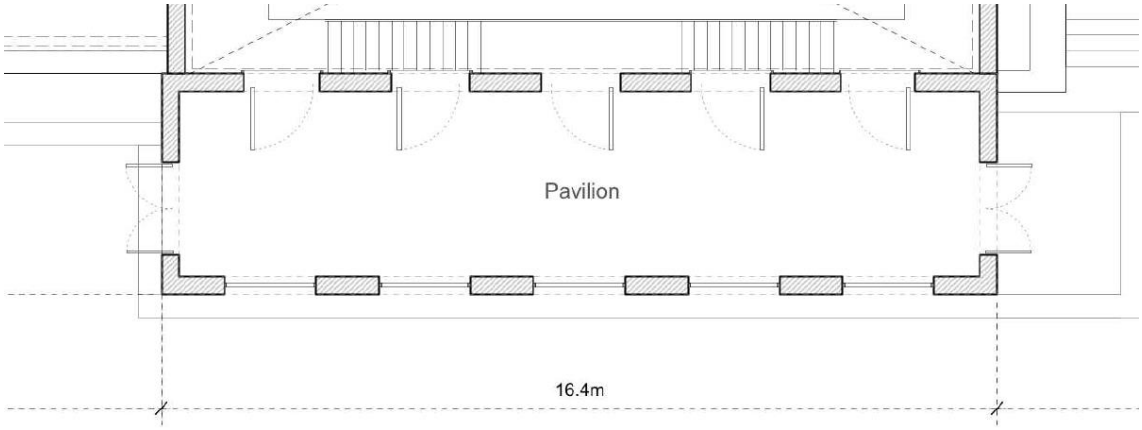


Plate 19: Extract from the proposed ground floor plan.

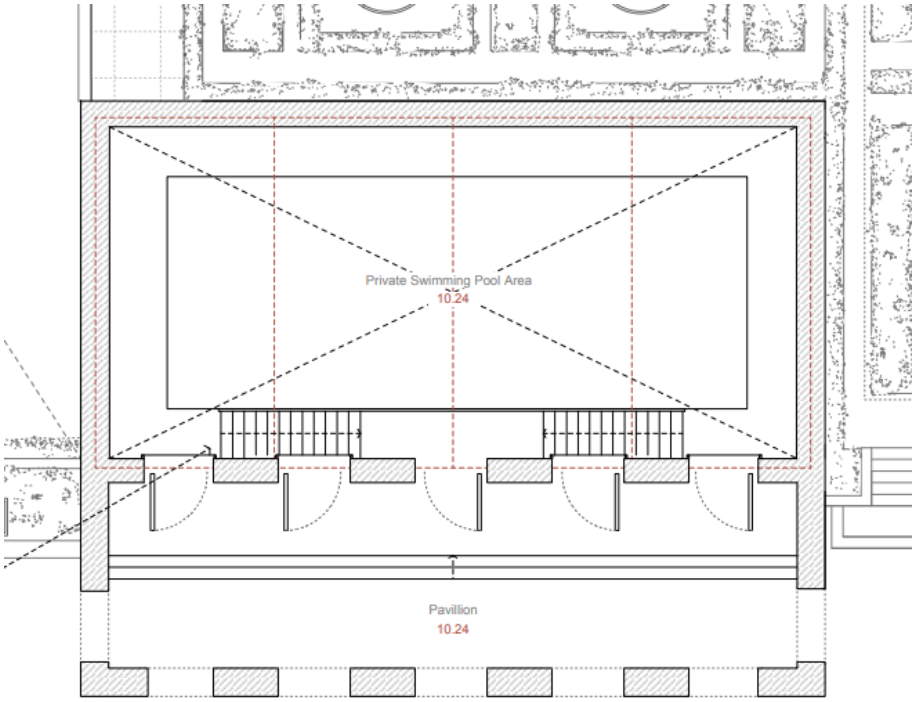


Plate 20: Extract from approved 2014 ground floor plan.

6.26. HDC stated that the incorporation of glazing was not supported and it should be removed. In the withdrawn 22/02452/LBC, Historic England commented on the installation of glazing within the as-built proposals, stating:

> ***"Preferably, we would wish to see the gazing removed from all the full-height openings at ground floor level in the pool house. Alternatively, the existing wide-profile metal framed glazing should be replaced with non-reflective frameless glazing set as far back as possible into the reveals and should only include two slim-profile metal framed doors on the east elevation."***[6]

6.27. The Appellant's Statement of Case states:

> ***"The Appellant accepts the advice from the Council and Historic England. The proposed alteration to fenestration reflects Historic England's suggestion and removes any identified harm to the heritage asset."***[7]

6.28. The submitted drawings, however, do not clearly depict this. Whilst the existing ground floor has notes that say the 'East elevation windows and glazed doors to be replaced', the proposed detailing does not indicate where doors vs windows will be positioned. The

[6] Historic England. Consultation Letter for 22/02452/LBC (28 March 2023). p.4. (***Appendix 3***).

[7] Artisan Planning and Development Consultants. *Appeal Statement of Case* (December 2023). p. 18.

proposed elevations also show glazing with the same sized framing as the existing. It is accepted that this element of the proposals can be further conditioned, but this does not fully alleviate the harm caused.

6.29. The overall proportions of the openings as proposed do not reflect the approved, and therefore negatively impact the design of the pool house, and thus, its relationship with the Listed host building. The 2014 pool house was approved on the basis of its detailed design being appropriate for its context, but the appeal proposals are a rudimentary version of the approved scheme, whose nuances made it acceptable. Whilst more slender framing would reduce the harm caused, the overall form of the openings is still considered to be harmful.

Reduction of pool house height by 400mm

6.30. The proposals also include the reduction in height of the as-built pool house by 400mm to more closely match the height of the approved 2014 proposals. This has been driven by comments of HDC and Historic England. Whilst this element of the proposals would reduce the perceived visual impact of the new building, and I have would not identify harm through this proposal alone, I still have reservations about the overall design, which will be discussed in my summary.

Removal of the spiral staircase and use of roof as a terrace

6.31. This element of the proposals has been driven by advice from HDC and Historic England to remove the ability to use the roof of the pool house as a terrace. The removal of the stair and this use would also decrease the perceived height of the pool house and make it more in line with the originally approved proposals in 2014. I have no concerns with this element of the proposals.

Removal of the glazed screen from the landscaped pond

6.32. This element of the proposals has been driven by comments from HDC and Historic England and would remove an element which is considered to be harmful to the overall design of the extension and thus its impact on the significance of the Listed Building through a change in setting; however, this element of the proposals is not depicted on any drawings.

Retention of the increased height of the west wall to within the walled garden

6.33. This element of the proposals was resisted by HDC on the basis that the increased wall height introduced a bland, slab-like elevation to the pool house. The proposals intend to retain the wall as is. The justification provided by the Appellant stated:

> ***"Change in design and built form results in a more consistent wall height along the perimeter. This is not considered to cause any harm to the significance of the Listed Building or Conservation Area."***[8]

[8] ibid.

6.34. The submitted Heritage Statement also said that the *"changes are modest in scale, are positioned within the much compromised and altered walled garden, and sustain all of the design principles deemed to be acceptable in the consented scheme."*[9]

6.35. I disagree with the above commentary and agree with HDC that the wall provides a large, blank façade, which creates the impression of a more discreet structure and removes the transition between the pool house, which is described as an orangery, and its garden (Plate 21 and Plate 22).

6.36. The 2014 proposals were considered acceptable partly due to the removal of the previous pool house building, which was considered to have a poor-quality design. Plate 23 shows the previous building and the large blank walls it had to the rear. This created a lack of activity to this elevation. The appeal proposals would result in the same severance between the outbuilding and the historic walled garden.

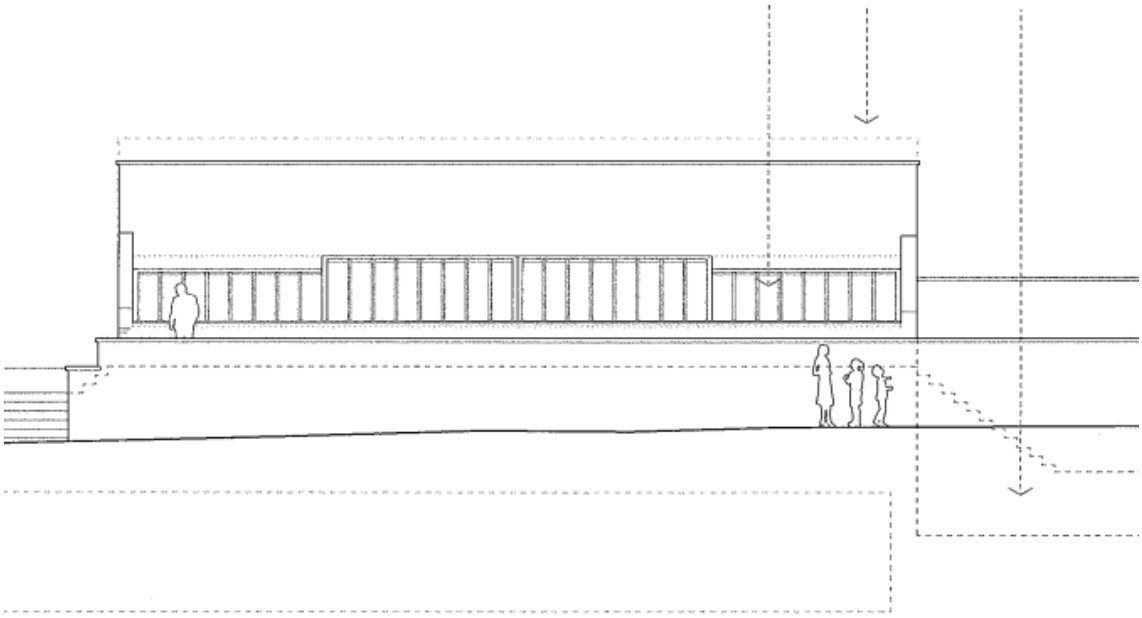


Plate 21: Approved wall within the 2014 proposals.

[9] Jon Lowe Heritage. *Heritage Statement* (July 2023). p.15.

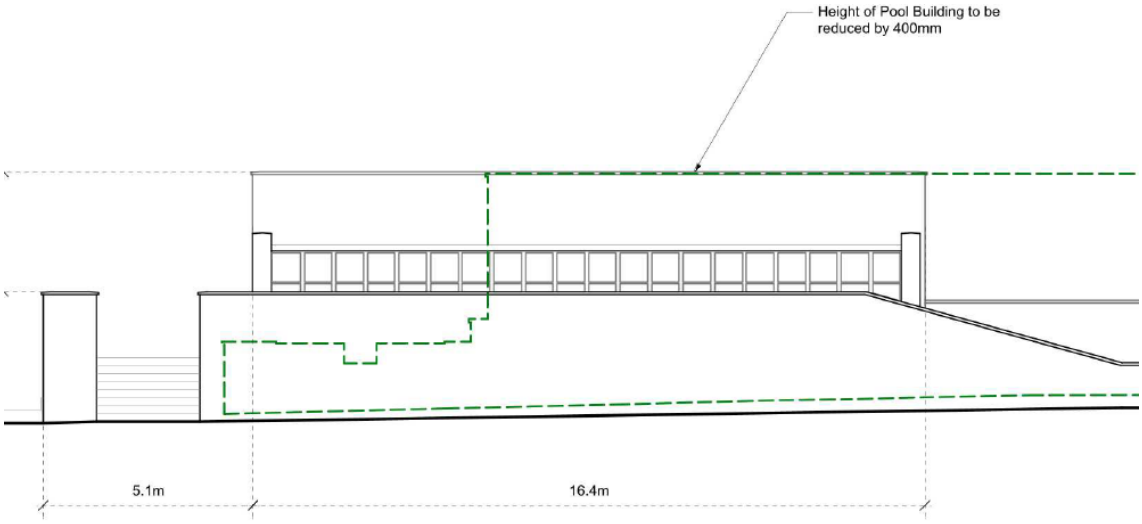


Plate 22: As proposed wall.



Plate 23: Previous pool house prior to the 2014 proposals (Source: Design and Access Statement by Hugh Cullum Architects, 2023.)

Creation of new access drive

6.37. The new access drive has been routed from the existing original drive across the front of the main building through its designed associated landscape and to an existing secondary access. The Appellant's Statement of Case did not refer to the drive, but it forms part of the appeal submission documents.

6.38. It is clear that the parkland is an important contributor to the significance of the Listed Building through setting including through its associations with Decimus Burton, who also designed the landscape and the intended, designed views across that landscape. The historic access routes did not cross in front of the house and instead were swooping around the perimeter of the estate to reach the house at its sides. The orientation of the building towards the parkland and not its accesses also confirms the intention for the views to remain uninterrupted towards the landscape.

6.39. The appeal proposals introduce new access directly in front of the Grade II* Listed Building, whose views since its construction would have primarily been to the parkland in which it was positioned. This new element changes the landscape, in which Decimus Burton retained the ridge and furrow earthworks. Therefore, views to and from the Listed Building would be negatively affected by this element.

6.40. Furthermore, the new direct access to the pool house alters the hierarchy of the site. Historically, the original access solely led to the main entrance of the house. The secondary access from Rideaway led to the walled garden of the property, but was clearly depicted as secondary in historic mapping. This access still exists but is not regularly used and has a clear overgrown character, unlike the original and principal access. However, the treatment of the new proposed access to match that of the original and principal access would give the pool house and this part of the site equal prominence to the main entrance. This would affect the way in which the historic, intended approach is understood as well as the function of the pool house as ancillary to the Listed Building.

6.41. The impact on the ridge and furrow will be discussed later in this statement, but it is clear that Decimus Burton retained this feature when designing Hemingford Park, and thus was intended to be experienced within the views. The incorporation of the new drive disrupts the lines of the ridge and furrow and thus the relationship between the house and its landscape. This is further affected by the incorporation of boundary treatments along the access and elsewhere on the site without Planning Permission.

6.42. Therefore, the proposed new access route would result in harm to the significance of the Listed Building through a change in setting.

Summary

6.43. Within the above proposals, it is considered that the overall design of the as-built pool house does not reflect the elegance of the approved 2014 pool house. Features such as the portico, proportions of the fenestration and height of its walls have all been altered to its detriment, removing the detailed characteristics of the approved scheme which made it acceptable in the context of the Listed Building. Whilst the pool house replaced a previous low-quality building, the previous building was clearly subservient to its host building. The appeal proposals have a stronger presence in views and compete with the main building whilst also detracting from the delicate characteristics of the Listed Building. The submitted Design and access Statement still includes an extract from the original proposals of how the proportions of the new building were derived, but this is no longer relevant based on how it has been built out and detailed. The appeal proposals therefore detract from the significance of the Grade II* Listed Hemingford Park Hall through a change in setting by virtue of the inappropriate design. This harm is combined with the impacts resulting from the incorporation of the access drive, which visually separates the landscape in views from the Listed Building.

6.44. With reference to the levels of harm in the NPPF, the proposals are considered to result in 'less than substantial harm' at the lower end of the spectrum to the significance of the Grade II* Listed Hemingford Park Hall through a change in setting. The Appellant's Statement of Case has not set out any public benefits in the proposals to weigh against this harm.

Ridge and Furrow – Non-designated Heritage Asset

6.45. Hemingford Abbots had an open-field system before the Enclosure Act of 1801 and the Award of 1806. There are examples of ridge and furrow around the entire settlement.

6.46. The indication of arable land through the long occupation of the area, and on historic cartographic sources suggests the ridge and furrow surrounding Hemingford Abbots and within the site may have medieval origins. Hemingford Abbots was not within the study area of Turning the Plough (2001) and thus did not have the potential to be identified as a Priority Township.

6.47. The ridge and furrow within the site has a roughly east-west alignment and has clear areas of disturbances through the creation of Hemingford Park Hall itself in 1842 and the associated access routes.

Statement of Significance

6.48. The ridge and furrow is an indicator of the long-standing arable practices that have occurred in the area, and whilst the land is no longer used for such practices and is rather part of the designed parkland of the Grade II* Listed Hemingford Park Hall, the retention of the ridge and furrow in the design of Hemingford Park itself suggests the intention by Decimus Burton to reinforce the historic origins of the site in views from the main house. Therefore, the ridge and furrow on the site has significance as a remaining potential medieval earthwork which indicates the earlier agricultural uses of the land within the site. Given the site forms part of a wider complex of earthworks in the area, it is considered to be part of a non-designated heritage asset. This is reinforced in the Conservation Area Appraisal, which states that ridge and furrow is *"now rare in the district and what remains here and on the Eastside Common should be valued and preserved."*[10]

Impact Assessment

6.49. The appeal proposal which affects the ridge and furrow within the site is the creation and retention of the new access track, which branches from the existing and goes eastward, looping around fenced plots and connecting to an existing track. This has not been explicitly included within the appeal proposals in the Appellant's Statement; however, the submission documents include a Site Location Plan which outlines this track, and therefore forms part of the appeal proposals.

[10] Huntingdonshire District Council. *The Hemingfords Conservation Area Character Assessment* (June 2008). p.12.

6.50. Firstly, the proposed track has physically disturbed the ridge and furrow, and it is clear in site photographs and aerial imagery that the ridge and furrow within this location has been irreversibly damaged (Plate 24 and Plate 25). Whilst this loss would be localised to the only the area of the proposed track, this would result in harm to the significance of the non-designated heritage asset through physical loss.

6.51. The proposed route of the track has not been done in line with the predominant orientation of the ridge and furrow and the associated fencing also affects the appreciation of the wider earthworks in ground level views and more so in the slightly elevated position of Hemingford Park Hall.

6.52. In summary, the proposed access track is considered to result in harm to the significance of the non-designated heritage asset through the physical loss and on the impacts on the appreciation of the feature.

6.53. It should also be noted that the proposed track on the submitted Site Location Plan does not match that which has been implemented (Plate 26).



Plate 24: Track and associated fencing cutting through the landscape.



Plate 25: The new route and fencing cutting through the ridge and furrow.



Plate 26: The site location plan overlaid onto the aerial image showing discrepancies.

6.54. Paragraph 209 of the NPPF states that the *"effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."* The Appellant's submission has provided no justification

for the requirement of the additional track and therefore, there are no public benefits presented to be weighed against the harm caused.

6.55. The submitted Heritage Statement assesses the impact of the track, stating that the *"track crosses historic parkland/pasture beyond the more formal garden areas and is flanked by simple timber post and rail fencing. The fencing is evident in views to and from the Grade II* house but as a surface feature the track has no visual impact."*[11]

6.56. The Heritage Statement further acknowledges that the track crosses ridge and furrow but that it is not statutorily protected, but the track *"may have had a limited impact on ridge and furrow but any impact is linear and localised and is not sufficient in scale to have removed evidence of its presence in this location or prevented an appreciation or understanding that it illustrates historic arable practices in this location."*[12]

6.57. Contrary to the statements above, by virtue of the track being a surface feature, it inherently has an impact on the appreciation of the existing uneven surface on which it was built. Furthermore, the provision of fencing in this location also further affects the views and appreciation of the earthworks. Whilst the statement suggests that these views already contain fencing, there is no evidence that Planning Permission has been granted for the erection of the fencing between the more formal garden areas and parkland. By virtue of being within the residential curtilage of the Listed Building, the erection of the fencing does not benefit from Permitted Development Rights. The submission of an application for Householder Planning Permission also reinforces that the Appellant takes the position that the parkland is residential curtilage.

6.58. Thus, this element of the scheme has resulted in the irreversible physical loss of part of the feature and thus, the proposals result in harm.

Hemingfords Conservation Area

6.59. The Hemingfords Conservation Area was first designated on 14th October 1974 and includes the settlements of Hemingford Grey and Hemingford Abbots and the surrounding meadlowlands. Huntingdonshire District Council adopted the *The Hemingfords Conservation Area Character Assessment* in June 2008. The map can be found in Plate 27.

[11] Jon Lowe Heritage. *Heritage Statemen*t (July 2023). p.18.

[12] Ibid.



Plate 27: Hemingfords Conservation Area boundary (Source: Hemingfords Conservation Area Character Assessment) with the site indicated in red.

6.60. The Conservation Area covers a large area, including both of the settlements, the River Ouse and many fields between and around the settlements and river. The Assessment states that the boundary is *"quite broad and falls naturally into defined localities that largely correspond to the historical phases in the development of the Hemingfords."*[13] The Assessment also includes an analysis map of the sub-areas of Hemingford Abbots, Hemingford Grey and the Thorpe. The relevant map for Hemingford Abbots can be found in ***Appendix 7***.

6.61. The layout of the Conservation Area is largely linear and based on the pattern of development along the River Ouse and the principal thoroughfare between the two settlements. The oldest built form is within the two nucleated settlements whilst the newer built form occupies the peripheries of the settlements, apart from the examples of Hemingford Park Hall and any former agricultural buildings which have since been amalgamated into the settlement. Plot sizes vary considerably, but there is still evidence of long and narrow medieval tenement plots in both settlements. Buildings within the village centres are typically positioned at the back of pavement with varying garden sizes, whilst later or older detached cottages and farmsteads sit more comfortably in larger plots. The overall development pattern and urban grain has allowed for a retained sense of hierarchy in the settlements, which also retains a connection to the landscape beyond.

6.62. Materials throughout the Conservation Area vary greatly but reflect vernacular practices, such as timber-frame and thatch, in combination with more readily available building materials from the Victorian period onwards, such as brick (Plate 28). Outliers include more

[13] Huntingdonshire District Council. *The Hemingfords Conservation Area Character Assessment* (June 2008). p.8.

significant historic buildings, such as the Grade I Listed Church of St. Margaret and the Grade I Listed Hemingford Grey Manor House, which have stone construction.

6.63. Green spaces within the Conservation Area are key to understanding its development, including public spaces within the village centres, private gardens and the meadows surrounding the settlements. Evidence of agricultural practices in the area from as far back as the Neolithic period confirm the importance the fertile land has been in the long-established settlements of the Hemingfords. The inclusion of the surrounding meadows within the Conservation Area boundary cements the importance of such open fields and agricultural land, as well as the associated vegetation. Ridge and furrow has been specifically mentioned as a positive contributor and can also be appreciated from both public and private views (Plate 29).

6.64. Important views and glimpses are indicated within the Conservation Area Character Assessment and include glimpses in the village centre and down principal thoroughfare, as well as important views across the Ouse from the footpath to Houghton, across the fields at the end of Common Lane and across the parkland of Hemingford Park from the lodge on Rideaway (Plate 30).



Plate 28: Centre of Hemingford Abbots with its mix of architectural styles and materials.



Plate 29: View of other ridge and furrow within the Conservation Area boundary.

Statement of Significance

6.65. The significance of the Hemingfords Conservation Area is principally derived from those elements of its intrinsic character and appearance detailed in the Character Assessment. These comprise aspects of its historic layout and street patterns, historic built form, archaeological remains, and important green spaces, all of which contribute to the combined historic, architectural, artistic, and archaeological interest of the designation area. Most of these interests can be better appreciated as part of key views within and towards the designation area, as identified within HDC's Character Appraisal.

6.66. The setting of the Conservation Area makes a lesser contribution to its significance. Principally, the elements of setting which contribute are the parts of the wider rural landscape that can be experienced in conjunction with the historic settlement as part of key views out from the designation area, thereby enabling its historic context as small rural settlements to be better appreciated.

Contribution of the Appeal Site

6.67. The parkland of Hemingford Park Hall is included within the Conservation Area boundary, with the Assessment stating:

> ***"Hemingford Park was laid out after 1806 on closes between the Rideaway and Common Lane. The preservation of ridge and furrow here indicates that this area was previously arable and most likely part of the***

settlement's early common field system. However, this does not preclude an early enclosure date for this part of the parish."[14]

6.68. As a country estate with a designed landscape on the outskirts of the villages, Hemingford Park is distinctive within the area. The main house is reflective of the Neo-Classical architecture in the mid 19th century and of the other work of its architect, Decimus Burton. The outbuildings, some of which are also Listed, are also indicative of such country estates. Therefore, the historic built form of Hemingford Park is considered to contribute positively to the significance of the Hemingfords Conservation Area (Plate 30).

6.69. The wider estate was also thought to be designed by Decimus Burton, and it is clear that the slightly elevated position of the house, its orientation and the route of its access were intentional to take advantage of views across the landscape. Whilst this landscape has designed elements such as ponds and vegetation, the ridge and furrow pre-dates the estate, but was left in situ, thus adding to the agrarian character of the views. Many trees and the ridge and furrow on the estate are explicitly noted within the Conservation Area Character Assessment as making a positive contribution to the Conservation Area.

6.70. Elements of the estate which are not considered to make a positive contribution include the proliferation of boundary treatments within the designed landscape and the large-scale agricultural buildings which have been erected since the middle of the 20th century.



Plate 30: Grade II Listed Park Lodge at the entrance to Hemingford Park.

<u>Impact Assessment</u>

[14] Huntingdonshire District Council. *The Hemingfords Conservation Area Character Assessment* (June 2008). p.13.

6.71. The proposed changes to the as-built pool house are minor in the context of the Conservation Area as a whole, but Paragraphs 6.43-6.44 of this statement concluded that the proposals result in a poorly-designed building in comparison with the approved 2014 scheme. Whilst this is more readily visible in private views within the estate or from neighbouring properties, the pool house can be glimpsed in public views from Rideaway. In such views, the prominence of the pool house is evident, particularly when seen with the Grade II* Listed Building (Plate 31).

6.72. The Conservation Area Character Assessment discusses the potential for development within the centre of Hemingford Abbots village centre and along Common Lane. Respectively, it states:

> ***"Rather higher standards of design and workmanship should be expected where, exceptionally, future development does occur. Many of the buildings erected during the latter part of the twentieth century have failed to make use of local vernacular forms, materials and building traditions."***
>
> ***"As with other parts of the village there is little scope for further development within this neighbourhood. Any future building should conform to the highest standards of local vernacular and reflect the use of traditional materials. In the past some of the more modern houses have been demolished and rebuilt. Were this to happen in the future any replacement buildings should be carefully designed with the local vernacular in mind, but without becoming mere pastiche."***[15]

6.73. It is clear that there is a high standard expected of new buildings within the Hemingfords. The appeal proposals do not fulfil these requirements and therefore are harmful to the Conservation Area. Furthermore, as a result of the physical loss of ridge and furrow, which is considered to be an important feature of the Conservation Area, the proposals will also result in harm.

[15] Ibis, pp.25-26.



Plate 31: As-built pool house when seen from the Grade II Listed Cricket Pavilion.

6.74. It is accepted that the impacts are relatively minor when considering the Conservation Area as a whole; however, this would equate to 'less than substantial harm' at the lower end of the spectrum.

7. Conclusions

7.1. There are clearly significant disparities between application documents, and it is only reasonable that the applications were not validated considering that the documentation did not give an adequate understanding of the scope of the proposals and whether the documents submitted were sufficient for the application types, or that the correct applications were submitted.

7.2. The appeal proposals are not sympathetic to the character and significance of the Grade II* Listed Building and would result in 'less than substantial harm' through a change in setting. There has been no submitted justification for the changes to the as-built structure from the 2014 approvals.

7.3. The proposed access track has not been addressed within the Appellant's Statement of Case, but has been included within the submission and justified in the Heritage Statement by the change of use of the site, which does not form part of the Appeal proposals. This element of the proposals results in harm to the significance of the Listed Building through the alterations to the original approach to the house and the negative impacts upon its landscape, including the destruction of ridge and furrow.

7.4. The ridge and furrow earthworks on the site are considered a non-designated heritage asset by virtue of their potentially medieval origins and their group value with other earthworks around the village. The proposals for the new access track have resulted in irreversible loss of an area of the ridge and furrow within Hemingford Park, which appears to have been purposely retained in the design and layout of the parkland. This results in harm to the significance of the non-designated heritage asset.

7.5. With respect to the Hemingfords Conservation Area, the proposals result in a poor-quality design in comparison with the originally approved 2014 proposals. The proposed form of the pool house does not exhibit the architectural qualities expected within the locality, nor does it relate to its high-quality host building any longer. Furthermore, the localised loss of the ridge and furrow, which is identified as an important feature within the Conservation Area, results in a negative impact to its significance. Whilst it is accepted that the proposals only form a small part of the Conservation Area, they have eroded the quality of the Conservation Area in this location. Therefore, the proposals will result in 'less than substantial harm' to the significance of the Hemingfords Conservation Area.

7.6. No public benefits have been provided within the Appellant's Statement of Case to weigh against the harm identified.

7.7. Therefore, the appeal proposals should be dismissed.

Appendix 1: 14/00578/FUL and 14/00579/LBC Decision Notice and Delegated Report

Application Number: 1400578FUL

TOWN & COUNTRY PLANNING ACT, 1990

PLANNING PERMISSION

Dr P Kaziewicz
c/o Trowers And Hamlins LLP (FAO Mrs J Backhaus)
3 Bunhill Row
London
EC1Y 8YZ

Huntingdonshire District Council in pursuance of powers under the above Act, hereby **GRANT PERMISSION** for:

Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds.
at Hemingford Park Common Lane Hemingford Abbots Huntingdon PE28 9AS

in accordance with your application received on 22nd April 2014 and plans (listed below) which form part of the application

Plan Type	Reference	Version	Date Received
floor levels	HP00.1P300	A	17.04.2014
floor levels	HP00.1P301	A	17.04.2014
Section	HP00.1P303	A	17.04.2014
Elevations	HP00.1P305	A	17.04.2014
Section	HP00.1P209	A	17.04.2014
Site Plan	HP00.1P002(-)		24.03.2014
Floor Plan/s	HP00.1P103(-)		24.03.2014
Elevations	HP00.1P108(-)		24.03.2014
Section	HP00.1P110(-)		24.03.2014
Elevations	HP00.1P206(-)		24.03.2014
Elevations	HP00.1P105(-)		24.03.2014
Elevations	HP00.1P306(-)		24.03.2014
Section	HP00.1P402(-)		24.03.2014
General	HP00.1P405(-)		24.03.2014
Site location Plan	HP00.1P001(-)		24.03.2014
Site Plan	HP00.1P003(-)		24.03.2014
Floor Plan/s	HP00.1P101(-)		24.03.2014
Floor Plan/s	HP00.1P102(-)		24.03.2014
Roof Plan	HP00.1P104(-)		24.03.2014
Floor Plan/s	HP00.1P100(-)		24.03.2014

Head of Development
ufm4
Date 20th August 2014

Huntingdonshire DISTRICT COUNCIL

Pathfinder House, St Mary's Street
Huntingdon. PE29 3TN
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DX140316 Huntingdon SC

Tel: 01480 388388
Fax: 01480 388099
www.huntingdonshire.gov.uk

Section	HP00.1P408(-)		24.03.2014
Floor Plan/s	HP00.1P500(-)		24.03.2014
Floor Plan/s	HP00.1P203(-)		24.03.2014
Elevations	HP00.1P207(-)		24.03.2014
Roof Plan	HP00.1P501(-)		24.03.2014
Elevations	HP00.1P106(-)		24.03.2014
Elevations	HP00.1P107(-)		24.03.2014
Section	HP00.1P109(-)		24.03.2014
Floor Plan/s	HP00.1P200(-)		24.03.2014
Floor Plan/s	HP00.1P201(-)		24.03.2014
Floor Plan/s	HP00.1P202(-)		24.03.2014
Details	HP00.1P308(-)		24.03.2014
Roof Plan	HP00.1P204(-)		24.03.2014
Elevations	HP00.1P205(-)		24.03.2014
Elevations	HP00.1P208(-)		24.03.2014
Floor Plan/s	HP00.1HP/06P1XXX		24.03.2014
Floor Plan/s	HP00.1P302(-)		24.03.2014
Elevations	HP00.1P304(-)		24.03.2014
Elevations	HP00.1P307(-)		24.03.2014
General	HP00.1P400(-)		24.03.2014
Roof Plan	HP00.1P401(-)		24.03.2014
Section	HP00.1P402(-)		24.03.2014
Section	HP00.1P403(-)		24.03.2014
Section	HP00.1P406(-)		24.03.2014
Section	HP00.1P407(-)		24.03.2014
Section	HP00.1P502(-)		24.03.2014
General	HP00.1P504(-)		24.03.2014
Elevations	HP00.1P505(-)		24.03.2014
Details	HP00.1P506(-)		24.03.2014
Section	HP00.1P409(-)		14.05.2014
Section	HP00.1P310(-)		14.05.2014
Section	HP00.1P309(-)		14.05.2014
Section	HP00.1P410(-)		14.05.2014

Subject to the following conditions:

1. Condition.
   The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

1. Reason.
   To comply with Section 91 of the Town and Country Planning Act 1990, as amended.

2. Condition.

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Work on the following elements of the building shall not start until the details listed below have been submitted to and approved in writing by the local planning authority:
- all new doors and windows;
- drawing no. 202 - construction details of: new partitions and doorways; new floor structure; new door to bathroom; blocking up existing doorway to wc and the method of fixing new features to existing fabric;
- mortar specification and brick type (a sample panel of brick and pointing will be required on site);
- specification for the zinc roofing and a sample of the material and jointing.

2. Reason.
To ensure that the development is carried out in keeping with the architectural and historic interest of the building.

3. Condition.
The development hereby permitted shall be carried out in accordance with the approved plans listed in the table above.

3. Reason.
For the avoidance of doubt to ensure that the development is carried out in accordance with the approved plans.

4. Note to applicant.
A fee is payable for each "request" when submitting details pursuant to a condition or conditions of this permission that require(s) details to be submitted to and approved by the Local Planning Authority (i.e. details submitted under Article 21 of the Town and Country Planning (General Development Procedure) Order). Further details on what constitutes a "request" can be found in the "Guidance Note - Fees for confirmation of compliance with condition attached to a planning permission". The appropriate fee can be found in the "Planning Fees Form". Both documents can be viewed via www.huntsdc.gov.uk. The Local Planning Authority should give written confirmation within a period of 8 weeks from the date on which the request and fee are received.

5. Note to applicant.
Statement as to how the Local Planning Authority (LPA) has worked with the applicant in a positive and proactive manner on seeking solutions:
The LPA positively encourages pre-application discussions and makes clear that applications will then normally be determined as submitted. Details of the 'Pre-Application Advice' process can be found on the Planning pages on the Council's website www.huntingdonshire.gov.uk. If, as proposed, a development is considered unacceptable and it is apparent how it can be revised to make it acceptable, the LPA will set out how it can be amended to make it acceptable as part of its response to a pre-application enquiry. When an application is received, conditions will be used where they can make a development acceptable. A clear reason for refusal identifies the specific reasons why the development is unacceptable and helps the applicant to determine whether and how the proposal can be revised to make it acceptable. In relation to this application, it was considered and the process managed in accordance with Paragraphs 186 and 187 of the NPPF.

APC **Head of Development**
ufm4
Date 20th August 2014

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NOTES

1. **Rights of Appeal under the Town and Country Planning Act, 1990 Section 78, The Planning (Listed Buildings and Conservation Areas) Act 1990 Section 20 and the Town and Country Planning (Control of Advertisement) Regulations 1989.**
2. If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission for the proposed development or to grant permission subject to conditions, he/she may appeal to the Secretary of State responsible for planning within;
   - **Six months from the date of this decision notice.**
   - **Eight weeks from the date of this notice if the decision relates to an advertisement.**
3. Appeals must be made on a form which is obtainable from the Planning Inspectorate, Customer Support Unit, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN. Alternatively all forms can be downloaded from their website www.planning-inspectorate.gov.uk. The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances, which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements, to the provisions of the Development Orders and to any directions given under the Orders. He does not, in practice, refuse to entertain appeals solely because the decision of the Local Planning Authority was based on a direction given by him.
4. If permission to develop land is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State responsible for planning and the owner of the land claims that the land has become incapable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council of the County District in which the land is situated a purchase notice requiring that Council to purchase his interest in the land in accordance with the provision of Part VI of the Town and Country Planning Act, 1990.
5. In certain circumstances, a claim may be made against the Local Planning Authority for compensation where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of an application to him. The circumstances in which such compensation is payable are set out in Section 114 of the Town and Country Planning Act 1990.
6. This decision notice does not convey any approval or consent which may be required under any enactment, bye-law or regulation other than Section 57 of the Town and Country Planning Act 1990.

APC **Head of Development**
ufm4
Date 20th August 2014

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OFFICER REPORT

Case No: 1400578FUL **Full Planning Application**

Proposal: **Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds.**

Location: **Hemingford Park Common Lane Hemingford Abbots**

Applicant: **Dr P Kaziewicz**

Grid Ref: **527610 270937**

DESCRIPTION OF SITE AND APPLICATION

The applications for planning permission and listed building consent relate to Hemingford Park, a grade II* listed building. The house and its extensive parkland are in the Hemingford Abbots Conservation Area. The house stands in the countryside approximately 400m south of Common Lane.

The main elements of this proposal are:
- the re-introduction of original floor levels on the ground floor in the area of the house containing the kitchen;
- demolition of a shed at rear of the house;
- construction of a glazed link to run between the kitchen in the main house to a new pool house;
- construction of new submerged pool house with sliding glass roof consisting of two storeys with swimming pool and spa facilities;
- raising a ceiling and removing internal posts in the billiard room;
- demolition of the existing pool house structure and two sheds.

NATIONAL GUIDANCE

The National Planning Policy Framework (2012) 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. Under the heading of Delivering Sustainable Development, the Framework sets out the Government's planning policies for : building a strong, competitive economy; ensuring the vitality of town centres; supporting a prosperous rural economy; promoting sustainable transport; supporting high quality communications infrastructure; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; meeting the challenge of climate change, flooding and coastal change; conserving and enhancing the natural environment; conserving and enhancing the historic environment; and facilitating the sustainable use of minerals.

The approach to heritage assets set out in the National Planning Policy Framework is:
- heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance (paras 126 and 132);
- applicants should describe the significance of the asset (para 128);

LPAs should identify and assess the particular significance of any asset and take this into account when considering a proposal's impact to minimise the conflict with conservation of the asset (para 129);
- in dealing with planning applications, LPAs should take account of:
sustaining the significance of heritage assets and putting them to viable uses consistent with their conservation
- the positive contribution of the conservation of heritage assets to economic viability
- the desirability of new development making a positive contribution to local character and distinctiveness (para 131)
- the more important the asset, the greater the weight that should be given to its conservation (para 132)
- significance can be harmed or lost through alteration or destruction of the asset or development within its setting;
- as heritage assets are irreplaceable, any harm should require clear and convincing justification;
- substantial harm to or loss of a grade II listed building should be exceptional
- substantial harm to or loss of assets of the highest significance, including grade II* buildings, should be wholly exceptional. Proposals leading to substantial harm to or total loss of significance of a designated heritage asset should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss unless all of the criteria listed in para. 133 apply;
- where proposals lead to less than substantial harm this should be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.

For full details visit the government website
https://www.gov.uk/government/organisations/department-for-communities-and-local-government

PLANNING POLICIES

Saved policies from the Huntingdonshire Local Plan (1995)

En2: "Character and setting of Listed Buildings" – indicates that any development affecting a building of architectural or historic merit will need to have proper regard to the scale, form, design and setting of the building. (Applies only to 'development' not to 'works' and therefore only to the planning application, not to the application for listed building consent)

En5: "Conservation area character" - development within or directly affecting Conservation Areas will be required to preserve or enhance their character or appearance. (Planning application only)

En6: "Design standards in conservation areas" – in conservation areas, the District Council will require high standards of design with careful consideration being given to the scale and form of development in the area and to the use of sympathetic materials of appropriate colour and texture. (Planning application only)

En17: "Development in the Countryside" - development in the countryside is restricted to that which is essential to the effective operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services.

En25: "General Design Criteria" – indicates that the District Council will expect new development to respect the scale, form, materials and design of established buildings in the locality and make provision for landscaping and amenity areas. (Planning application only)

Saved policies from the Huntingdonshire Local Plan Alterations (2002)
None relevant.

Adopted Huntingdonshire Local Development Framework Core Strategy (2009)

CS1: "Sustainable development in Huntingdonshire" – all development will contribute to the pursuit of sustainable development, having regard to social, environmental and economic issues. All aspects will be considered, including design, implementation and function of development. (Planning application only)

Draft Huntingdonshire Local Plan to 2036: Stage 3 (2013)

Policy LP 1 – "Strategy and principles for development":
This proposal will be expected to (j) protect and enhance the historic environment and the range and vitality of characteristic landscapes, habitats and species. (Planning application only)

LP 13: Quality of Design - A proposal will need to be designed to a high standard based on a thorough understanding of the site and its context. A proposal will therefore be expected to demonstrate, amongst other things, that it:
b. contributes positively to the local character, appearance, form and pattern of development through sensitive siting, scale, massing, form and arrangement of new development and use of colour and materials;
d. respects and responds appropriately to the distinctive qualities of the surrounding landscape, and avoids the introduction of incongruous and intrusive elements into views. Where harm to local landscape character as a result of necessary development is unavoidable, appropriate mitigation measures will be required;
e. has had regard to the Huntingdonshire Design Guide SPD (2007), Huntingdonshire Landscape and Townscape Assessment SPD (2007) and the Cambridgeshire Design Guide (2007) or successor documents and other relevant advice that promotes high quality design or that details the quality or character of the surroundings including, but not limited to, conservation area character statements, neighbourhood development plans, village design statements, parish plans, urban design frameworks, design briefs, master plans and national guidance;

LP 15: Ensuring a High Standard of Amenity - A proposal will be supported where a high standard of amenity is provided for existing and future users and residents of both the surroundings and the proposed development. A proposal will therefore be expected to demonstrate how it addresses:
a. availability of daylight and sunlight, particularly the amount of natural light entering homes, the effects of overshadowing and the need for artificial light;
b. the design and separation of buildings with regard to the potential for overlooking causing loss of privacy and resultant physical relationships and whether they could be considered to be oppressive or overbearing;
c. the predicted internal and external levels, timing, duration and character of noise;
d. the potential for adverse impacts on air quality, particularly affecting air quality management areas;
e. the potential for adverse impacts of obtrusive light and the contamination of land, groundwater or surface water; and
f. the extent to which people feel at risk from crime by incorporating Secured By Design principles.

LP 26: Homes in the Countryside –
Extension, Alteration or Replacement of an Existing Home
A proposal for extension, alteration or replacement of an existing home in the countryside will be supported where it does not significantly increase the height or massing compared with the original building and does not significantly increase the impact on the surrounding countryside. Replacement homes will be expected to be located in the same position as that being replaced unless relocation would bring about benefits in terms of:
a. the amenity of residents; or
b. releasing land of high agricultural value by replacement on that of lower agricultural value.

A proposal for the erection, alteration, replacement or extension of an outbuilding which is ancillary to an existing home in the countryside will be supported where it is well related to the home, of a scale consistent with it and where it remains ancillary to the home.

LP 31: Heritage Assets and their Settings - Great weight is given to the conservation of any heritage asset; more weight is accorded to assets of greater significance.

A proposal which affects the special interest or significance of any heritage asset or its setting must demonstrate how it will conserve, and where appropriate enhance, the asset. Any harm must be fully justified and this harm will be weighed against the public benefit of the proposal. Substantial harm or loss will require exceptional justification. Harm to assets of the highest significance will require wholly exceptional justification.

A proposal will be required to show, amongst other things, that:
a. it has clearly identified all the heritage assets affected by the proposal and their special interests and significance, this is to be set out in a heritage statement;
b. the design, siting, scale form and materials of any proposed development will be sympathetic to the special interests and significance of the heritage asset;
c. it would not have an adverse impact on views of or from the heritage asset or of the open spaces, trees or street scene which contribute positively to any heritage assets and their setting;
d. it clearly sets out how any alterations preserve the interests of a listed heritage asset; and

Huntingdonshire Design Guide SPD 2007 is also relevant.

The Hemingfords Conservation Area Character Assessment

Local policies are viewable at https://www.huntingdonshire.gov.uk

Natural England Landscape Character Area - National Character Area 88(NCA88) "The Bedfordshire and Cambridgeshire Claylands".

PLANNING HISTORY

0402589FUL Erection of an agricultural building for livestock and machinery storage. Refused. Dec 2004.

0500222FUL Erection of an agricultural building for livestock. Granted March 2005.

1300109LBC Re-instatement of internal brick wall between two 2nd floor bedrooms and addition of false wall within adjacent bathroom Granted May 2013

1300304LBC Internal alterations to coach house and stables to include partition and floor. Withdrawn.

1300325FUL Construction of 30 metre x 50 metre manege for private use. Granted April 2013.

1300449LBC Alterations and conservatory extension to cottage and workshop. Withdrawn.

1301319FUL Construction of horse walker. Granted November 2013.

1301556LBC Installation of roof lanterns and alterations to porch Granted Dec 2013.

1301626FUL Installation of roof lanterns. Granted Dec 2013.

1301808FUL Use of the ground floor for garaging purposes. Creation of

rear vehicular access through provision of blind arch. Reinstatement of use of the first floor as ancillary residential accommodation with associated works. Pending.

1301809LBC Use of the ground floor for garaging purposes. Creation of rear vehicular access through provision of blind arch. Reinstatement of use of the first floor as ancillary residential accommodation with associated works. Pending.

1301810FUL Change of use of existing workshop to residential use. Pending.

1301811LBC Change of use of existing workshop to residential use and
erection of slate roof conservatory to rear (in place of unauthorised conservatory)

1301828FUL Erection of stables and calving bays. Pending.

1400578FUL Original floor levels re introduced on ground floor of main
house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds. Current application.

1400579LBC As above.

CONSULTATIONS

Hemingford Abbots Parish Council – The Hemingford Abbots Parish Council resolved to make no observations for or against.

English Heritage - Hemingford Park dates from 1842-43 and was designed by Decimus Burton for Reverend J Linton. This two-storey, yellow brick country house has a hipped slate roof with modillion eaves cornice and central pediment to the west. There is a three window range of hung sashes with glazing bars and a slightly protruding bay with flat-roofed
portico with pilasters and two Doric order columns.

English Heritage Advice - English Heritage welcomes the holistic aim of the proposals; namely to clarify the relationship of the main house with its immediate gardens, together with the wider landscape park, that would involve reinstatement of the original boundaries and walls which defined specific areas of the estate. Having considered the application documentation in detail, I am satisfied that the proposals as submitted reflect the evolution of this comprehensive, complex scheme as discussed at pre-application stage. I had no in principle objection to the insertion of a glazed link between the kitchen and the proposed replacement pool house but considered a prerequisite to be that the scale, materials and detailed design (externally and internally) of such a link should comprise a visually unintrusive, elegant, predominantly glazed structure with a standing seam lead or lead-look roof. I am therefore relieved to see that the proposed link as formally submitted, does satisfy these criteria. I welcome the proposed demolition of the unauthorised, recently constructed pool house and its replacement with a more contextually appropriate yellow stock-brick building incorporating a sliding glass roof. I also welcome the proposed reinstatement of the original floor levels in the existing kitchen that had been raised to match the upper ground floor level. I have no objection to the proposed alteration to the height of the ceiling of the Billiard Room, or to the removal of posts within the room to accommodate the kitchen, which is to be relocated from its current position within the main house. Overall, I consider these extensive proposal would not cause harm to the significance of this grade II* listed country house, its immediate setting and wider landscape park or to the conservation area within which it is located. The removal of unauthorised recent additions and their replacement with more contextually

appropriate structures is welcomed. I would have no objection should you be minded to approve the application.

Recommendation
English Heritage advises that following a series of detailed discussions and revisions at pre-application stage, we consider the proposals as submitted would not cause harm to the significance of the grade II* listed Hemingford Park country house, its immediate setting and wider landscape park, or to the Hemingfords Conservartion Area. We consider the scheme to be contextually appropriate in scale, materials and detailed design in this sensitive location and to be in accordance with guidance in the NPPF. We would have no objection should your authority be minded to approve the application for listed building consent.

REPRESENTATIONS

None received by the planning authority.

SUMMARY OF ISSUES

The report addresses the principal, important and controversial issues which are:
- the principle of the pool house
- the impact of the development and works on heritage assets
- the impact of the developments on the countryside

The decision on the planning application has to be made in accordance with the following sections of the Planning (Listed Buildings and Conservation Areas) Act 1990:
- section 66(1) – General duty as respects listed buildings in exercise of planning functions – "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses";
- section 72(1) - General duty as respects conservation areas in exercise of planning functions - "In the exercise, with respect to any building or other land in a conservation area of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

The principle of the pool house

The main element of the proposal is the pool house. This is a substantial building which although attached to the house also has many of the characteristics of an outbuilding. It has therefore been considered as an extension but regard has also been had to the planning policy for outbuildings. Policy LP26 states that extensions to existing homes in the countryside will be supported where they do not significantly increase the height or massing compared with the original building and do not significantly increase the impact on the surrounding countryside. Proposals for outbuildings which are ancillary to an existing home will be supported where the building it is well related to the home, of a scale consistent with it and where it remains ancillary to the home. It is considered that all these criteria are met in this case.

The impact of the development and works on heritage assets

The details of the application have been the subject of extensive pre-application discussions.

The re-introduction of original floor levels on the ground floor in the area of the house containing the kitchen is welcomed because it is a move towards the original layout and it removes post-war alterations which were out of keeping with the original character.

The demolition of the unsightly modern shed at rear of the house is also a welcome improvement.

The main new work, the construction of submerged pool house with sliding glass roof consisting of two storeys with swimming pool and spa facilities is proposed in a manner which is highly sympathetic to the building and it secures the demolition of the existing pool house structure and two sheds which are unsatisfactory post-war additions to the house. The glazed link to run between the kitchen in the main house and the new pool house will be executed in a modern manner which is considered to be entirely appropriate to and respectful of the original architecture. It allows the house to evolve in a way which safeguards its character and architectural importance.

Raising the ceiling and removing internal posts in the ground floor room which is currently used as a billiard room also leaves the character of the building unaffected.

The impact of the developments on the countryside

The parkland is an important area of open countryside which is included in the Conservation Area because of its intrinsic attractiveness and its relationship to the listed buildings in this group and to the built-up area of the village. The positive contribution of this group is that of a large house of very high architectural character in a formal setting, marred only by the uncharacteristic 1970s style detached pool building which does not have sufficient stature for the house (and by the loss of the walled garden some years ago). The new pool building has sufficient stature and it therefore enhances the group and its impact on the countryside.

Conclusion

Having regard to the special requirements which apply to the consideration of planning applications which affect a listed building or its setting and the character or appearance of a conservation area it is considered that the proposals have an entirely beneficial impact through safeguarding the listed building and enhancing the conservation area.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

BACKGROUND PAPERS:

CONTACT OFFICER:
Enquiries about this report to **Mr Nigel Swaby Development Management Team Leader 01480 388461**

RECOMMENDATION

SUMMARY OF CONDITIONS.

1. Condition. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

1. Reason. To comply with Section 91 of the Town and Country Planning Act 1990, as amended.

2. Condition. Work on the following elements of the building shall not start until the details listed below have been submitted to and approved in writing by the local planning authority:

- all new doors and windows;
- drawing no. 202 - construction details of: new partitions and doorways; new floor structure; new door to bathroom; blocking up existing doorway to wc and the method of fixing new features to existing fabric;
- mortar specification and brick type (a sample panel of brick and pointing will be required on site);
- specification for the zinc roofing and a sample of the material and jointing.

2. Reason. To ensure that the development is carried out in keeping with the architectural and historic interest of the building.

3. Condition. The development hereby permitted shall be carried out in accordance with the approved plans listed in the table above.

3. Reason. For the avoidance of doubt to ensure that the development is carried out in accordance with the approved plans.

4. Note to applicant. A fee is payable for each "request" when submitting details pursuant to a condition or conditions of this permission that require(s) details to be submitted to and approved by the Local Planning Authority (i.e. details submitted under Article 21 of the Town and Country Planning (General Development Procedure) Order). Further details on what constitutes a "request" can be found in the "Guidance Note - Fees for confirmation of compliance with condition attached to a planning permission". The appropriate fee can be found in the "Planning Fees Form". Both documents can be viewed via www.huntsdc.gov.uk. The Local Planning Authority should give written confirmation within a period of 8 weeks from the date on which the request and fee are received.

5. Note to applicant. Statement as to how the Local Planning Authority (LPA) has worked with the applicant in a positive and proactive manner on seeking solutions:

The LPA positively encourages pre-application discussions and makes clear that applications will then normally be determined as submitted. Details of the 'Pre-Application Advice' process can be found on the Planning pages on the Council's website www.huntingdonshire.gov.uk. If, as proposed, a development is considered unacceptable and it is apparent how it can be revised to make it acceptable, the LPA will set out how it can be amended to make it acceptable as part of its response to a pre-application enquiry. When an application is received, conditions will be used where they can make a development acceptable. A clear reason for refusal identifies the specific reasons why the development is unacceptable and helps the applicant to determine whether and how the proposal can be revised to make it acceptable. In relation to this application, it was considered and the process managed in accordance with Paragraphs 186 and 187 of the NPPF.

Application Number: 1400579LBC

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT, 1990

LISTED BUILDING CONSENT

Dr P Kaziewicz
c/o Trowers And Hamlins LLP (FAO Mrs J Backhaus)
3 Bunhill Row
London
EC1Y 8YZ

Huntingdonshire District Council in pursuance of powers under the above Act, hereby **CONSENT** to:

Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds.
at Hemingford Park Common Lane Hemingford Abbots Huntingdon PE28 9AS

in accordance with your application received on 22nd April 2014 and plans (listed below) which form part of the application

Plan Type	Reference	Version	Date Received
floor levels	HP00.1P300	A	17.04.2014
floor levels	HP00.1P301	A	17.04.2014
Section	HP00.1P303	A	17.04.2014
Elevations	HP00.1P305	A	17.04.2014
Section	HP00.1P209	A	17.04.2014
Site Plan	HP00.1P002(-)		24.03.2014
Floor Plan/s	HP00.1P103(-)		24.03.2014
Elevations	HP00.1P108(-)		24.03.2014
Section	HP00.1P110(-)		24.03.2014
Elevations	HP00.1P206(-)		24.03.2014
Elevations	HP00.1P105(-)		24.03.2014
Elevations	HP00.1P306(-)		24.03.2014
Section	HP00.1P402(-)		24.03.2014
General	HP00.1P405(-)		24.03.2014
Site location Plan	HP00.1P001(-)		24.03.2014
Site Plan	HP00.1P003(-)		24.03.2014
Floor Plan/s	HP00.1P101(-)		24.03.2014

APC

Head of Development
(Development Management)
ufm8
Date 20th August 2014

Huntingdonshire DISTRICT COUNCIL

Pathfinder House, St Mary's Street
Huntingdon. PE29 3TN
mail@huntsdc.gov.uk
DX140316 Huntingdon SC

Tel: 01480 388388
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Floor Plan/s	HP00.1P102(-)		24.03.2014
Roof Plan	HP00.1P104(-)		24.03.2014
Floor Plan/s	HP00.1P100(-)		24.03.2014
Section	HP00.1P408(-)		24.03.2014
Floor Plan/s	HP00.1P500(-)		24.03.2014
Floor Plan/s	HP00.1P203(-)		24.03.2014
Elevations	HP00.1P207(-)		24.03.2014
Roof Plan	HP00.1P501(-)		24.03.2014
Elevations	HP00.1P106(-)		24.03.2014
Elevations	HP00.1P107(-)		24.03.2014
Section	HP00.1P109(-)		24.03.2014
Floor Plan/s	HP00.1P200(-)		24.03.2014
Floor Plan/s	HP00.1P201(-)		24.03.2014
Floor Plan/s	HP00.1P202(-)		24.03.2014
Details	HP00.1P308(-)		24.03.2014
Roof Plan	HP00.1P204(-)		24.03.2014
Elevations	HP00.1P205(-)		24.03.2014
Elevations	HP00.1P208(-)		24.03.2014
Floor Plan/s	HP00.1HP/06P1XXX		24.03.2014
Floor Plan/s	HP00.1P302(-)		24.03.2014
Elevations	HP00.1P304(-)		24.03.2014
Elevations	HP00.1P307(-)		24.03.2014
General	HP00.1P400(-)		24.03.2014
Roof Plan	HP00.1P401(-)		24.03.2014
Section	HP00.1P402(-)		24.03.2014
Section	HP00.1P403(-)		24.03.2014
Section	HP00.1P406(-)		24.03.2014
Section	HP00.1P407(-)		24.03.2014
Section	HP00.1P502(-)		24.03.2014
General	HP00.1P504(-)		24.03.2014
Elevations	HP00.1P505(-)		24.03.2014
Details	HP00.1P506(-)		24.03.2014
Section	HP00.1P409(-)		14.05.2014
Section	HP00.1P310(-)		14.05.2014
Section	HP00.1P309(-)		14.05.2014
Section	HP00.1P410(-)		14.05.2014

Subject to the following conditions:



ARC

Head of Development
(Development Management)
ufm8
Date 20th August 2014

Huntingdonshire
DISTRICT COUNCIL

Pathfinder House, St Mary's Street
Huntingdon. PE29 3TN
mail@huntsdc.gov.uk
DX140316 Huntingdon SC

Tel: 01480 388388
Fax: 01480 388099
www.huntingdonshire.gov.uk

1. Condition.
   This Listed Building Consent is granted subject to the condition that the works to which it relates shall be begun not later than the expiration of three years from the date of this consent.

1. Reason.
   The time limit condition is imposed to comply with the requirements of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

2. Condition.
   Work on the following elements of the building shall not start until the details listed below have been submitted to and approved in writing by the local planning authority:
   - all new doors and windows;
   - drawing no. 202 - construction details of: new partitions and doorways; new floor structure; new door to bathroom; blocking up existing doorway to wc and the method of fixing new features to existing fabric;
   - mortar specification and brick type (a sample panel of brick and pointing will be required on site);
   - specification for the zinc roofing and a sample of the material and jointing.

2. Reason.
   To ensure that the development is carried out in keeping with the architectural and historic interest of the building.



ARC **Head of Development**
(Development Management)
ufm8
Date 20th August 2014

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NOTES

1. **Rights of Appeal under the Town and Country Planning Act, 1990 Section 78, The Planning (Listed Buildings and Conservation Areas) Act 1990 Section 20 and the Town and Country Planning (Control of Advertisement) Regulations 1989.**
2. If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission for the proposed development or to grant permission subject to conditions, he/she may appeal to the Secretary of State responsible for planning within;
   - **Six months from the date of this decision notice.**
   - **Eight weeks from the date of this notice if the decision relates to an advertisement.**
3. Appeals must be made on a form which is obtainable from the Planning Inspectorate, Customer Support Unit, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN. Alternatively all forms can be downloaded from their website www.planning-inspectorate.gov.uk. The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances, which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements, to the provisions of the Development Orders and to any directions given under the Orders. He does not, in practice, refuse to entertain appeals solely because the decision of the Local Planning Authority was based on a direction given by him.
4. If permission to develop land is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State responsible for planning and the owner of the land claims that the land has become incapable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council of the County District in which the land is situated a purchase notice requiring that Council to purchase his interest in the land in accordance with the provision of Part VI of the Town and Country Planning Act, 1990.
5. In certain circumstances, a claim may be made against the Local Planning Authority for compensation where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of an application to him. The circumstances in which such compensation is payable are set out in Section 114 of the Town and Country Planning Act 1990.
6. This decision notice does not convey any approval or consent which may be required under any enactment, bye-law or regulation other than Section 57 of the Town and Country Planning Act 1990.

APC **Head of Development**
(Development Management)
ufm8
Date 20th August 2014

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OFFICER REPORT

Case No: 1400579LBC **Listed Building Consent**

Proposal: **Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds.**

Location: **Hemingford Park Common Lane Hemingford Abbots**

Applicant: **Dr P Kaziewicz**

Grid Ref: **527610 270937**

DESCRIPTION OF SITE AND APPLICATION

The applications for planning permission and listed building consent relate to Hemingford Park, a grade II* listed building. The house and its extensive parkland are in the Hemingford Abbots Conservation Area. The house stands in the countryside approximately 400m south of Common Lane.

The main elements of this proposal are:
- the re-introduction of original floor levels on the ground floor in the area of the house containing the kitchen;
- demolition of a shed at rear of the house;
- construction of a glazed link to run between the kitchen in the main house to a new pool house;
- construction of new submerged pool house with sliding glass roof consisting of two storeys with swimming pool and spa facilities;
- raising a ceiling and removing internal posts in the billiard room;
- demolition of the existing pool house structure and two sheds.

NATIONAL GUIDANCE

The National Planning Policy Framework (2012) 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. Under the heading of Delivering Sustainable Development, the Framework sets out the Government's planning policies for : building a strong, competitive economy; ensuring the vitality of town centres; supporting a prosperous rural economy; promoting sustainable transport; supporting high quality communications infrastructure; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; meeting the challenge of climate change, flooding and coastal change; conserving and enhancing the natural environment; conserving and enhancing the historic environment; and facilitating the sustainable use of minerals.

The approach to heritage assets set out in the National Planning Policy Framework is:
- heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance (paras 126 and 132);
- applicants should describe the significance of the asset (para 128);

LPAs should identify and assess the particular significance of any asset and take this into account when considering a proposal's impact to minimise the conflict with conservation of the asset (para 129);
- in dealing with planning applications, LPAs should take account of:
sustaining the significance of heritage assets and putting them to viable uses consistent with their conservation
- the positive contribution of the conservation of heritage assets to economic viability
- the desirability of new development making a positive contribution to local character and distinctiveness (para 131)
- the more important the asset, the greater the weight that should be given to its conservation (para 132)
- significance can be harmed or lost through alteration or destruction of the asset or development within its setting;
- as heritage assets are irreplaceable, any harm should require clear and convincing justification;
- substantial harm to or loss of a grade II listed building should be exceptional
- substantial harm to or loss of assets of the highest significance, including grade II* buildings, should be wholly exceptional. Proposals leading to substantial harm to or total loss of significance of a designated heritage asset should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss unless all of the criteria listed in para. 133 apply;
- where proposals lead to less than substantial harm this should be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.

For full details visit the government website
https://www.gov.uk/government/organisations/department-for-communities-and-local-government

PLANNING POLICIES

Saved policies from the Huntingdonshire Local Plan (1995)

En2: "Character and setting of Listed Buildings" – indicates that any development affecting a building of architectural or historic merit will need to have proper regard to the scale, form, design and setting of the building. (Applies only to 'development' not to 'works' and therefore only to the planning application, not to the application for listed building consent)

En5: "Conservation area character" - development within or directly affecting Conservation Areas will be required to preserve or enhance their character or appearance. (Planning application only)

En6: "Design standards in conservation areas" – in conservation areas, the District Council will require high standards of design with careful consideration being given to the scale and form of development in the area and to the use of sympathetic materials of appropriate colour and texture. (Planning application only)

En17: "Development in the Countryside" - development in the countryside is restricted to that which is essential to the effective operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services.

En25: "General Design Criteria" – indicates that the District Council will expect new development to respect the scale, form, materials and design of established buildings in the locality and make provision for landscaping and amenity areas. (Planning application only)

Saved policies from the Huntingdonshire Local Plan Alterations (2002)
None relevant.

Adopted Huntingdonshire Local Development Framework Core Strategy (2009)

CS1: "Sustainable development in Huntingdonshire" – all development will contribute to the pursuit of sustainable development, having regard to social, environmental and economic issues. All aspects will be considered, including design, implementation and function of development. (Planning application only)

Draft Huntingdonshire Local Plan to 2036: Stage 3 (2013)

Policy LP 1 – "Strategy and principles for development":
This proposal will be expected to (j) protect and enhance the historic environment and the range and vitality of characteristic landscapes, habitats and species. (Planning application only)

LP 13: Quality of Design - A proposal will need to be designed to a high standard based on a thorough understanding of the site and its context. A proposal will therefore be expected to demonstrate, amongst other things, that it:
b. contributes positively to the local character, appearance, form and pattern of development through sensitive siting, scale, massing, form and arrangement of new development and use of colour and materials;
d. respects and responds appropriately to the distinctive qualities of the surrounding landscape, and avoids the introduction of incongruous and intrusive elements into views. Where harm to local landscape character as a result of necessary development is unavoidable, appropriate mitigation measures will be required;
e. has had regard to the Huntingdonshire Design Guide SPD (2007), Huntingdonshire Landscape and Townscape Assessment SPD (2007) and the Cambridgeshire Design Guide (2007) or successor documents and other relevant advice that promotes high quality design or that details the quality or character of the surroundings including, but not limited to, conservation area character statements, neighbourhood development plans, village design statements, parish plans, urban design frameworks, design briefs, master plans and national guidance;

LP 15: Ensuring a High Standard of Amenity - A proposal will be supported where a high standard of amenity is provided for existing and future users and residents of both the surroundings and the proposed development. A proposal will therefore be expected to demonstrate how it addresses:
a. availability of daylight and sunlight, particularly the amount of natural light entering homes, the effects of overshadowing and the need for artificial light;
b. the design and separation of buildings with regard to the potential for overlooking causing loss of privacy and resultant physical relationships and whether they could be considered to be oppressive or overbearing;
c. the predicted internal and external levels, timing, duration and character of noise;
d. the potential for adverse impacts on air quality, particularly affecting air quality management areas;
e. the potential for adverse impacts of obtrusive light and the contamination of land, groundwater or surface water; and
f. the extent to which people feel at risk from crime by incorporating Secured By Design principles.

LP 26: Homes in the Countryside –
Extension, Alteration or Replacement of an Existing Home
A proposal for extension, alteration or replacement of an existing home in the countryside will be supported where it does not significantly increase the height or massing compared with the original building and does not significantly increase the impact on the surrounding countryside. Replacement homes will be expected to be located in the same position as that being replaced unless relocation would bring about benefits in terms of:
a. the amenity of residents; or
b. releasing land of high agricultural value by replacement on that of lower agricultural value.

A proposal for the erection, alteration, replacement or extension of an outbuilding which is ancillary to an existing home in the countryside will be supported where it is well related to the home, of a scale consistent with it and where it remains ancillary to the home.

LP 31: Heritage Assets and their Settings - Great weight is given to the conservation of any heritage asset; more weight is accorded to assets of greater significance.

A proposal which affects the special interest or significance of any heritage asset or its setting must demonstrate how it will conserve, and where appropriate enhance, the asset. Any harm must be fully justified and this harm will be weighed against the public benefit of the proposal. Substantial harm or loss will require exceptional justification. Harm to assets of the highest significance will require wholly exceptional justification.

A proposal will be required to show, amongst other things, that:
a. it has clearly identified all the heritage assets affected by the proposal and their special interests and significance, this is to be set out in a heritage statement;
b. the design, siting, scale form and materials of any proposed development will be sympathetic to the special interests and significance of the heritage asset;
c. it would not have an adverse impact on views of or from the heritage asset or of the open spaces, trees or street scene which contribute positively to any heritage assets and their setting;
d. it clearly sets out how any alterations preserve the interests of a listed heritage asset; and

Huntingdonshire Design Guide SPD 2007 is also relevant.

The Hemingfords Conservation Area Character Assessment

Local policies are viewable at https://www.huntingdonshire.gov.uk

Natural England Landscape Character Area - National Character Area 88(NCA88) "The Bedfordshire and Cambridgeshire Claylands".

PLANNING HISTORY

0402589FUL Erection of an agricultural building for livestock and machinery storage. Refused. Dec 2004.

0500222FUL Erection of an agricultural building for livestock. Granted March 2005.

1300109LBC Re-instatement of internal brick wall between two 2nd floor bedrooms and addition of false wall within adjacent bathroom Granted May 2013

1300304LBC Internal alterations to coach house and stables to include partition and floor. Withdrawn.

1300325FUL Construction of 30 metre x 50 metre manege for private use. Granted April 2013.

1300449LBC Alterations and conservatory extension to cottage and workshop. Withdrawn.

1301319FUL Construction of horse walker. Granted November 2013.

1301556LBC Installation of roof lanterns and alterations to porch Granted Dec 2013.

1301626FUL Installation of roof lanterns. Granted Dec 2013.

1301808FUL Use of the ground floor for garaging purposes. Creation of

rear vehicular access through provision of blind arch. Reinstatement of use of the first floor as ancillary residential accommodation with associated works. Pending.

1301809LBC Use of the ground floor for garaging purposes. Creation of rear vehicular access through provision of blind arch. Reinstatement of use of the first floor as ancillary residential accommodation with associated works. Pending.

1301810FUL Change of use of existing workshop to residential use. Pending.

1301811LBC Change of use of existing workshop to residential use and erection of slate roof conservatory to rear (in place of unauthorised conservatory)

1301828FUL Erection of stables and calving bays. Pending.

1400578FUL Original floor levels re introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds. Current application.

1400579LBC As above.

CONSULTATIONS

Hemingford Abbots Parish Council – The Hemingford Abbots Parish Council resolved to make no observations for or against.

English Heritage - Hemingford Park dates from 1842-43 and was designed by Decimus Burton for Reverend J Linton. This two-storey, yellow brick country house has a hipped slate roof with modillion eaves cornice and central pediment to the west. There is a three window range of hung sashes with glazing bars and a slightly protruding bay with flat-roofed portico with pilasters and two Doric order columns.

English Heritage Advice - English Heritage welcomes the holistic aim of the proposals; namely to clarify the relationship of the main house with its immediate gardens, together with the wider landscape park, that would involve reinstatement of the original boundaries and walls which defined specific areas of the estate. Having considered the application documentation in detail, I am satisfied that the proposals as submitted reflect the evolution of this comprehensive, complex scheme as discussed at pre-application stage. I had no in principle objection to the insertion of a glazed link between the kitchen and the proposed replacement pool house but considered a prerequisite to be that the scale, materials and detailed design (externally and internally) of such a link should comprise a visually unintrusive, elegant, predominantly glazed structure with a standing seam lead or lead-look roof. I am therefore relieved to see that the proposed link as formally submitted, does satisfy these criteria. I welcome the proposed demolition of the unauthorised, recently constructed pool house and its replacement with a more contextually appropriate yellow stock-brick building incorporating a sliding glass roof. I also welcome the proposed reinstatement of the original floor levels in the existing kitchen that had been raised to match the upper ground floor level. I have no objection to the proposed alteration to the height of the ceiling of the Billiard Room, or to the removal of posts within the room to accommodate the kitchen, which is to be relocated from its current position within the main house. Overall, I consider these extensive proposal would not cause harm to the significance of this grade II* listed country house, its immediate setting and wider landscape park or to the conservation area within which it is located. The removal of unauthorised recent additions and their replacement with more contextually

appropriate structures is welcomed. I would have no objection should you be minded to approve the application.

Recommendation
English Heritage advises that following a series of detailed discussions and revisions at pre-application stage, we consider the proposals as submitted would not cause harm to the significance of the grade II* listed Hemingford Park country house, its immediate setting and wider landscape park, or to the Hemingfords Conservartion Area. We consider the scheme to be contextually appropriate in scale, materials and detailed design in this sensitive location and to be in accordance with guidance in the NPPF. We would have no objection should your authority be minded to approve the application for listed building consent.

REPRESENTATIONS

None received by the planning authority.

SUMMARY OF ISSUES

The report addresses the principal, important and controversial issues which are:
- the principle of the pool house
- the impact of the development and works on heritage assets
- the impact of the developments on the countryside

The decision on the planning application has to be made in accordance with the following sections of the Planning (Listed Buildings and Conservation Areas) Act 1990:
- section 66(1) – General duty as respects listed buildings in exercise of planning functions – "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses";
- section 72(1) - General duty as respects conservation areas in exercise of planning functions - "In the exercise, with respect to any building or other land in a conservation area of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

The principle of the pool house

The main element of the proposal is the pool house. This is a substantial building which although attached to the house also has many of the characteristics of an outbuilding. It has therefore been considered as an extension but regard has also been had to the planning policy for outbuildings. Policy LP26 states that extensions to existing homes in the countryside will be supported where they do not significantly increase the height or massing compared with the original building and do not significantly increase the impact on the surrounding countryside. Proposals for outbuildings which are ancillary to an existing home will be supported where the building it is well related to the home, of a scale consistent with it and where it remains ancillary to the home. It is considered that all these criteria are met in this case.

The impact of the development and works on heritage assets

The details of the application have been the subject of extensive pre-application discussions.

The re-introduction of original floor levels on the ground floor in the area of the house containing the kitchen is welcomed because it is a move towards the original layout and it removes post-war alterations which were out of keeping with the original character.

The demolition of the unsightly modern shed at rear of the house is also a welcome improvement.

The main new work, the construction of submerged pool house with sliding glass roof consisting of two storeys with swimming pool and spa facilities is proposed in a manner which is highly sympathetic to the building and it secures the demolition of the existing pool house structure and two sheds which are unsatisfactory post-war additions to the house. The glazed link to run between the kitchen in the main house and the new pool house will be executed in a modern manner which is considered to be entirely appropriate to and respectful of the original architecture. It allows the house to evolve in a way which safeguards its character and architectural importance.

Raising the ceiling and removing internal posts in the ground floor room which is currently used as a billiard room also leaves the character of the building unaffected.

The impact of the developments on the countryside

The parkland is an important area of open countryside which is included in the Conservation Area because of its intrinsic attractiveness and its relationship to the listed buildings in this group and to the built-up area of the village. The positive contribution of this group is that of a large house of very high architectural character in a formal setting, marred only by the uncharacteristic 1970s style detached pool building which does not have sufficient stature for the house (and by the loss of the walled garden some years ago). The new pool building has sufficient stature and it therefore enhances the group and its impact on the countryside.

Conclusion

Having regard to the special requirements which apply to the consideration of planning applications which affect a listed building or its setting and the character or appearance of a conservation area it is considered that the proposals have an entirely beneficial impact through safeguarding the listed building and enhancing the conservation area.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

BACKGROUND PAPERS:

CONTACT OFFICER:
Enquiries about this report to **Mr Nigel Swaby Development Management Team Leader 01480 388461**

RECOMMENDATION

SUMMARY OF CONDITIONS.

1. Condition. This Listed Building Consent is granted subject to the condition that the works to which it relates shall be begun not later than the expiration of three years from the date of this consent.

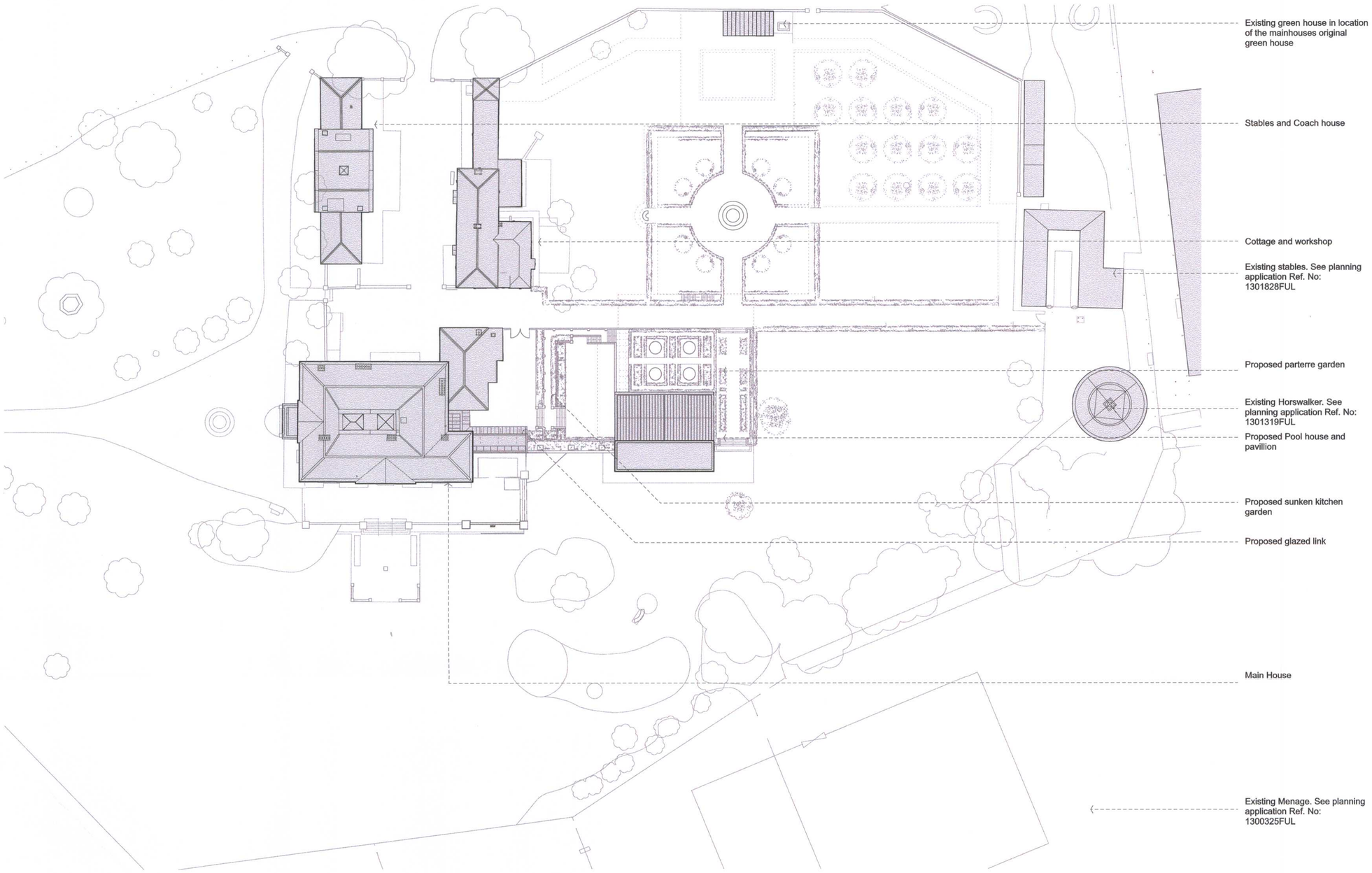
1. Reason. The time limit condition is imposed to comply with the requirements of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

2. Condition. Work on the following elements of the building shall not start until the details listed below have been submitted to and approved in writing by the local planning authority:

- all new doors and windows;
- drawing no. 202 - construction details of: new partitions and doorways; new floor structure; new door to bathroom; blocking up existing doorway to wc and the method of fixing new features to existing fabric;
- mortar specification and brick type (a sample panel of brick and pointing will be required on site);
- specification for the zinc roofing and a sample of the material and jointing.

2. Reason. To ensure that the development is carried out in keeping with the architectural and historic interest of the building.

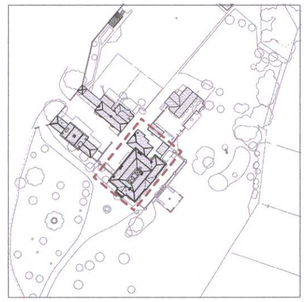
Appendix 2: 14/00578/FUL and 14/00579/LBC Approved Drawings



PROPOSED SITE PLAN

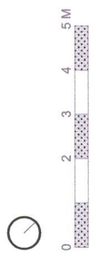
General Notes
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Issue Status
SK Information F Feasibility D Design
P Permissions S Scheme T Tender
C Construction E Existing Condition



Hemingford Park Hall
(formerly listed as
The Hall)
II* GV

1842-43. Built for Rev J Linton by Decimus Burton. Yellow brick country house. Hipped slate roof with modillion eaves cornice and central pediment to west. Two-storeys. Three window range of hung sashes with glazing bars. Slightly projecting central bay with flat-roofed portico with pilasters and two columns of Doric order. Central double doors with rectangular fan light and side lights. Modern terrace to right hand. Interior has open string stair of turned balusters with guilloche band add egg and dart moulding to string support and arcade of Doric columns. Two pilasters and two columns of Composite order in arcade at landing. Original doors, cornice mouldings, and central lamp bosses. Rear stair-case intact.



(_): Revision Information (00.00.02/AA)
Revision: Information (date/drawn by)

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Hemingford Park

Proposed
Site Plan
1:500@A2 February 2014

HP001.P003(-)

Access from Orchard to guest spa

Extent of guest spa, availible to users of the holiday lets

Mew garden wall built to replicate location of historic garden wall

Upper Garden Terrace
13.51

Lower Garden Terrace
12.97

Lower Kitchen Garden Below

Private Swimming Pool Area
10.24

Pavillion
10.24

Exterior Route to main house and upper kitchen garden

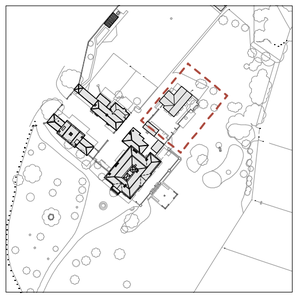
High level garden wall to match existing wall. Concealed route to poolhouse beneath

Access to pavillion at lower level

GROUND FLOOR PLAN

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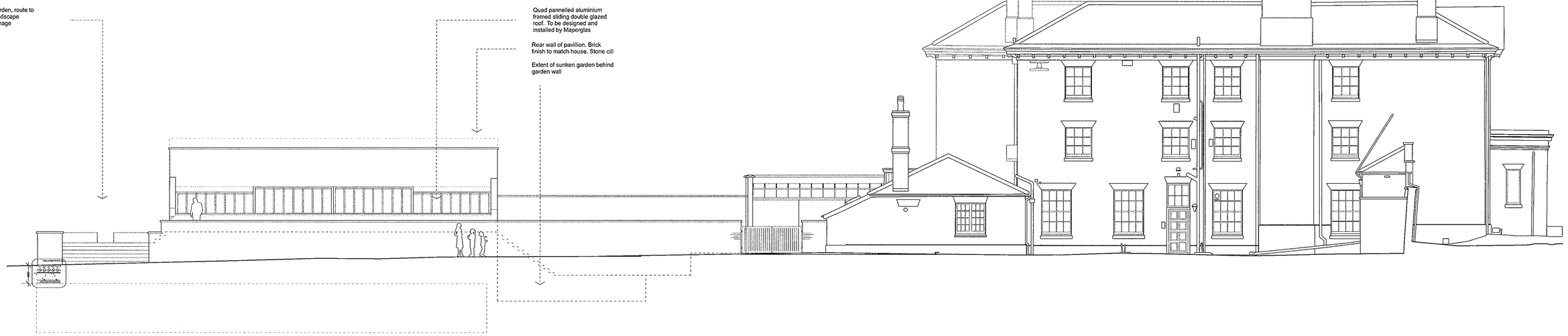
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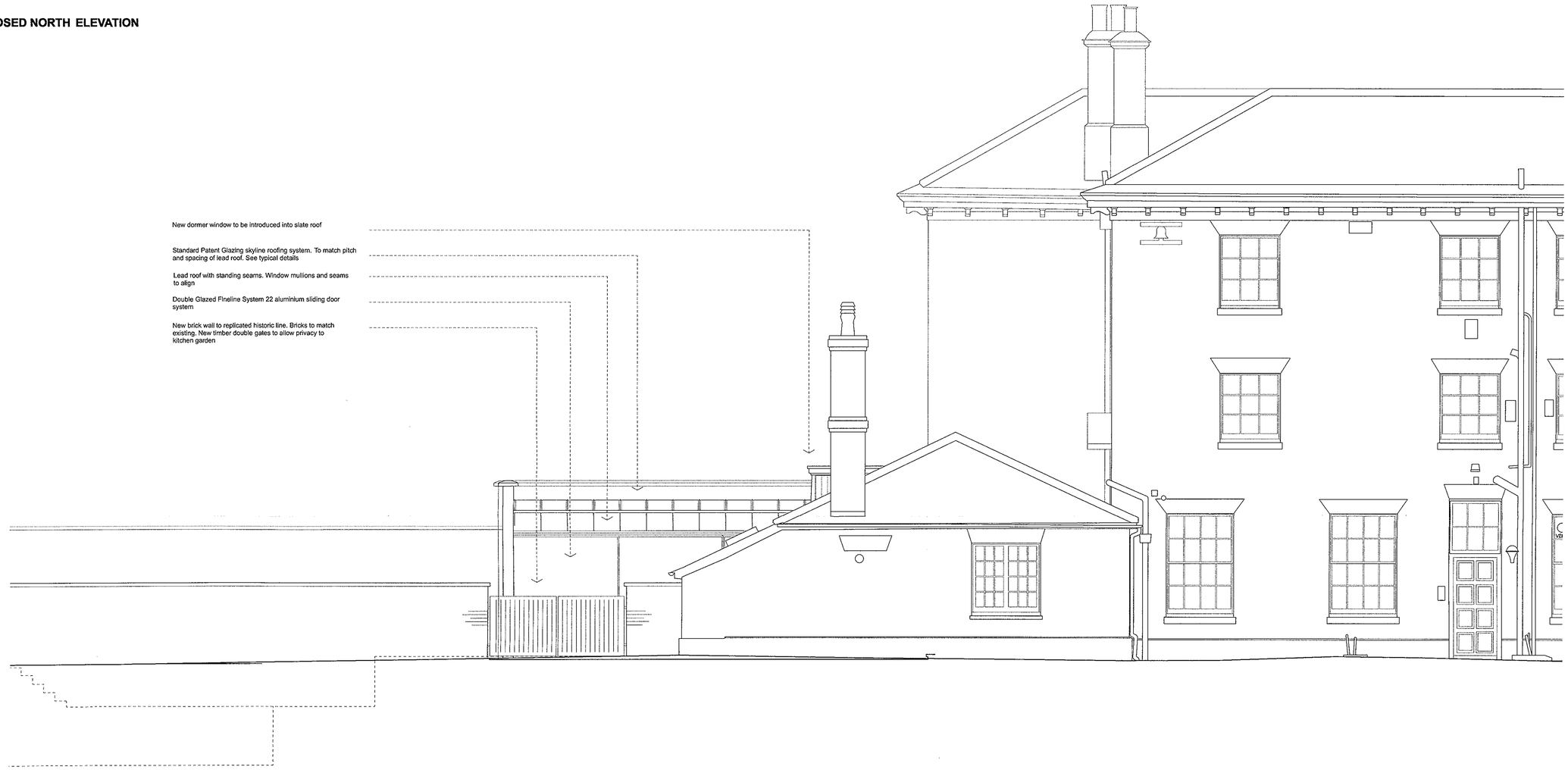
Hemingford Park

Proposed
Ground Floor Plan
1:100@A2 February 2014

HP001.P301(A)



PROPOSED NORTH ELEVATION



PROPOSED MAIN HOUSE/GLAZED LINK ELEVATION @ 1:50

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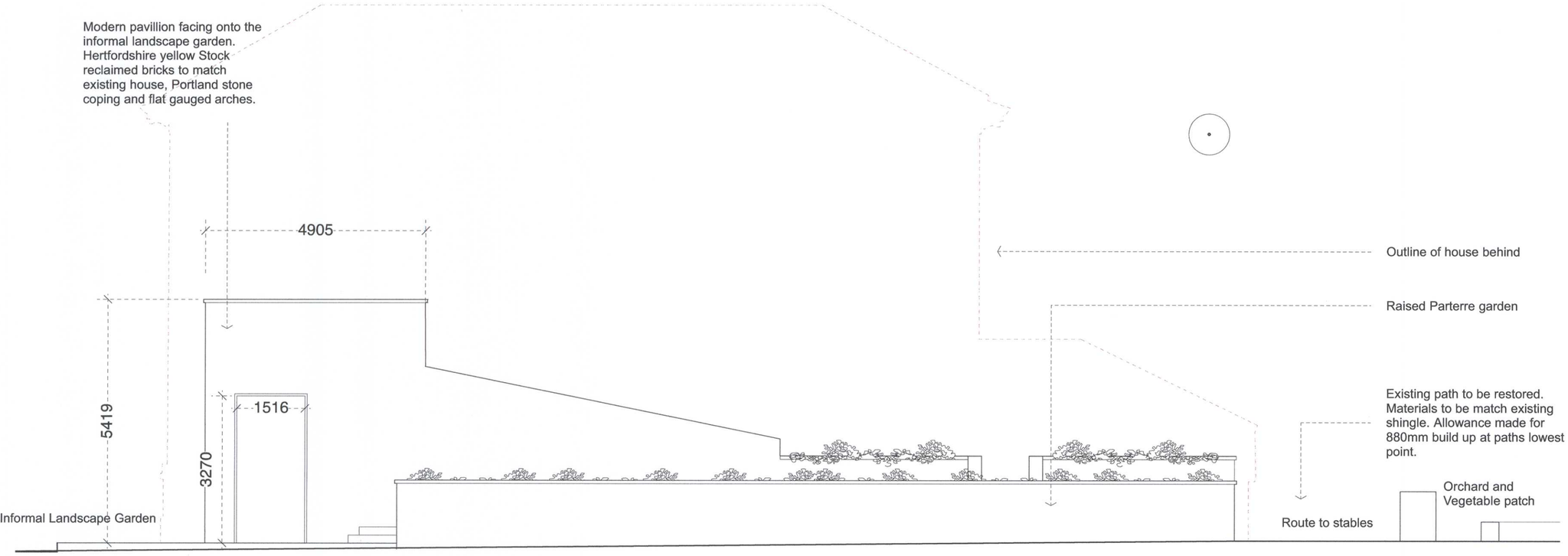
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Hemingford Park

Proposed
West Elevation
1:100&50@A1 February 2014

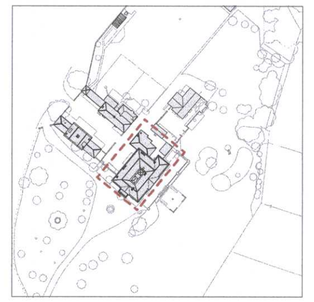
HP001.P207(-)



PROPOSED NORTH ELEVATION

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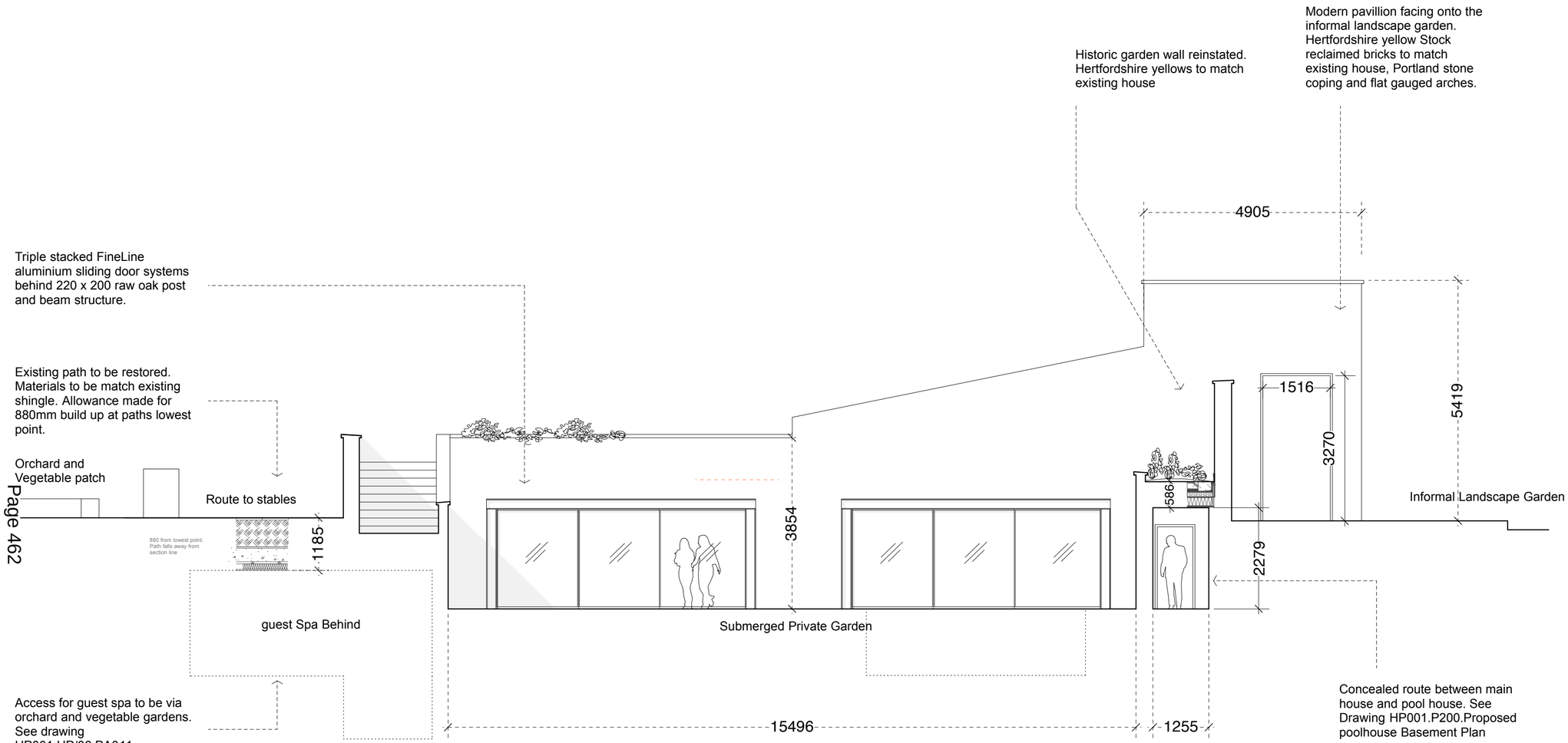
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Hemingford Park

Proposed
Pool House North Elevation
1:75@A2 February 2014

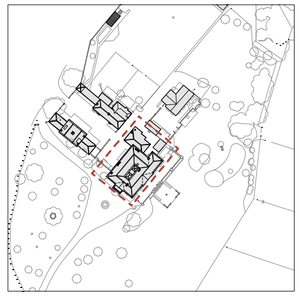
HP001.P307(-)



PROPOSED POOLHOUSE SECTION

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Hemingford Park

Proposed
Pool house South Elevation
1:75@A2 February 2014

HP001.P305(A)

Appendix 3: 22/02452/LBC Historic England Comments

Historic England

Mr Kevin Simpson
Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
Cambridgeshire
PE29 3TN

Direct Dial: 01223 582716

Our ref: L01556290

28 March 2023

Dear Mr Simpson

Arrangements for Handling Heritage Applications Direction 2021

HEMINGFORD PARK HALL, HEMINGFORD PARK, COMMON LANE, HEMINGFORD ABBOTS, HUNTINGDON, PE28 9AS
Application No. 22/02452/LBC

Thank you for your letter of 16 January 2023 regarding the above application for listed building consent.

On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The significance of the historic environment

Hemingford Park Hall is a yellow brick country house that was built for Rev J Linton by Decimus Burton in 1842-43. It is of two storeys with a hipped slate roof with a modillion eaves cornice and a central pediment to the west.

There is a three-window range of hung sashes with glazing bars, together with a slightly projecting central bay with flat-roofed portico with pilasters and two columns of the Doric order. There are central double doors with a rectangular fan light and side lights.

The interior has an open string stair of turned balusters with guilloche band egg and dart moulding to the string support and an arcade of Doric columns.

At the landing level there are two pilasters and two columns of the Composite order in an arcade.

The Hall is listed at grade II* in recognition of its special architectural and historic

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Stonewall DIVERSITY CHAMPION

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

significance. However, we are aware that since 2014, extensive works have been carried out to the interior of the Hall that have not been contextually sensitive.

The (retrospective) proposals and their impact on the historic environment

Listed Building Consent was granted in 2014 (14/00579/LBC) for *Original floor levels to be re-introduced on ground floor of main house. Demolition of shed at rear of the property. Construction of a glazed link to run between the kitchen of the main house to a newly constructed, submerged pool house with sliding glass roof. Pool house will consist of two storeys with swimming pool and associated spa facilities. Ceiling raised and internal posts removed in billiards room. Gardens landscaped. Demolition of existing pool house structure and two sheds.*

Historic England (Engish Heritage) had detailed discussions at pre-application stage regarding the above proposals and, following some revisions, had no objections on heritage grounds to the scheme as consented.

The *As Built* scheme differs from the consented scheme in that:

- The pool house has been built 5.3m further away from the Hall than was consented.
- Glazing has been inserted into all the full height openings on the east, north and south elevations, incorporating overly wide metal frame profiles.
- A roof terrace has been created at second floor level.
- A spiral staircase has been attached to the north elevation of the pool house to provide access to the roof terrace.
- The overall height of the pool house is 400mm taller than the consented scheme.
- A landscaped pond has been installed on the east eleveation adjacent to the spiral staircase, with a chrome and glass balustrade along its entire length.
- A subterranean car park with vehicle lift and surrounding enclosure has been constructed on the north side of the pool house.
- Minor variation and increased height of wall to western side of building (within walled garden).
- Variation to the iternal plan form and levels.

We consider the specific elements of the above *As Built* scheme that cause an unacceptable level of harm to the significance of the grade II* Hall as a result of their impact on it setting are:

- The glazing and wide-profile metal frames in all of the openings in the pool house.
- The overall increase in height of the pool house by 400mm.
- The roof terrace at second floor level.

- The spiral staircase attached to the north elevation.
- The chrome and glass balustrade along the entire east elevation of the landscaped pond.

Policy considerations for these proposals

As the application affects a listed building, the statutory requirement to pay special attention to the desirability of preserving the building, its setting and any features of special interest (s.72,1990 Act) must be taken into account by your authority when making its decision. In this instance we would stress that the Hall is grade II* listed and so is within the top 5.8% of listed buildings nationally.

The NPPF identifies that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

It clearly sets out the requirement to conserve the significance of heritage assets, and emphasises that great weight should be given to this (and the more important the asset the greater that weight shoud be), paragraphs 189, 197 and 199. For this reason any harm requires a clear and convincing justification. Less than substantial harm should be weighed against the public benefits of the proposals (paragraphs 200 and 202).

Setting is then defined in the Framework as 'the suroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral.'

Historic England's position on the proposals

We have assessed the documentation submitted with the application, including the *Heritage Statement* produced by Jon Lowe Heritage and the *Proposed* and *As Built* drawings produced by Hugh Cullum Architects Ltd and we object to the Pool and Spa Building in its current configuration.

In our view the pool house and spa in its current form is wholly inappropriate in this highly sensitive location, in contrast with the scheme that was consented in 2014.

We consider that in its *As Built* form it causes a high level of less than substantial harm to the significance of the adjacent Hall as a result of the impact on its setting.

The height of the *As Built* pool house, together with the spiral staircase that provides access to a roof terrace and the installation of the adjacent landscaped pond, has

created an overly dominant rather than contextually sensitive, recessive feature in relation to the adjacent grade II* listed Hall.

We therefore urge your authority to seek alterations to the pool house that would assist in mitigating the level of harm caused by these unauthorised works to the significance of the Hall.

Preferably, we would wish to see the glazing removed from all the full-height openings at ground floor level in the pool house. Alternatively, the existing wide-profile metal framed glazing should be replaced with non-reflective frameless glazing set as far back as possible into the reveals and should only include two slim-profile metal framed doors on the east elevation.

The height of the pool house should be reduced by 400mm to that of the consented scheme and the spiral staircase attached to the north elevation should be removed; thereby removing the unauthorised roof terrace.

The chrome and glass balustrade along the entire east elevation of the landscaped pool should be replaced with a wall of the same height as the balustrade, built in brick and designed to match the wall connecting the pool house to the Hall.

Whilst these amendments would not address the impact of all of the unauthorised works, we are of the view that the alterations outlined above would ensure that the pool house would no longer be an overly dominant feature within the setting of the grade II* listed Hemingford Park Hall. The level of harm caused to the significance of the Hall through the impact on its setting would thereby be reduced to a low level of less than substantial harm.

Recommendation

Historic England objects to the application on heritage grounds in its current configuration.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

You should also bear in mind section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving

or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Sheila Stones
Inspector of Historic Buildings and Areas
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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Appendix 4: Legislation and Planning Policy

Legislation

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.[16]

Section 16 (2) of the Act relates to the consideration of applications for Listed Building Consent and states that:

> ***"In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."***[17]

Section 66(1) of the Act goes on to state that:

> ***"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."***[18]

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

> ***"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."***[19]

A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 208 of the current, revised NPPF), this is in keeping with the requirements of the 1990 Act.[20]

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[16] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

[17] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16(2).

[18] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

[19] Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

[20] Jones v Mordue [2015] EWCA Civ 1243.

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

> ***"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."***[21]

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[22]

National Planning Policy Framework (December 2023)

National policy and guidance is set out in the Government's *National Planning Policy Framework* (*NPPF*) published in December 2023. This replaced and updated the previous *NPPF* (September 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic,

[21] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

[22] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

> ***"Plans and decisions should apply a presumption in favour of sustainable development.***
>
> ***For plan-making this means that:***
>
> ***a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
>
> ***b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
>
> ***i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or***
>
> ***ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***
>
> ***For decision-taking this means:***
>
> ***a. approving development proposals that accord with an up-to-date development plan without delay; or***
>
> ***b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
>
> ***i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or***
>
> ***ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."***[23]

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

> ***"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific***

[23] DLUHC, *NPPF*, para. 11.

> ***Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change."***[24] *(My emphasis).*

The *NPPF* continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

> ***"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."***[25]

The NPPF goes on to define a Designated Heritage Asset as a:

> ***"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."***[26]

As set out above, significance is also defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[27]

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 201 that:

> ***"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a***

[24] DLUHC, *NPPF*, para. 11, fn. 7.

[25] DLUHC, *NPPF*, Annex 2.

[26] DLUHC, *NPPF*, Annex 2.

[27] DLUHC, *NPPF*, Annex 2.

proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."[28]

Paragraph 203 goes on to state that:

> ***"In determining planning applications, local planning authorities should take account of:***
>
> ***a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
>
> ***b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
>
> ***c. the desirability of new development making a positive contribution to local character and distinctiveness."***[29]

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 205 and 206 are relevant and read as follows:

> ***"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."***[30]
>
> ***"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:***
>
> ***a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***
>
> ***b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."***[31]

In the context of the above, it should be noted that paragraph 207 reads as follows:

> ***"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary***

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[28] DLUHC, *NPPF*, para. 201.

[29] DLUHC, *NPPF*, para. 203.

[30] DLUHC, *NPPF*, para. 205.

[31] DLUHC, *NPPF*, para. 206.

to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site; and

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use."[32]

Paragraph 208 goes on to state:

> ***"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."***[33]

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

> ***"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the***

[32] DLUHC, *NPPF*, para. 207.

[33] DLUHC, *NPPF*, para. 208.

> ***contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."***[34]

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

> ***"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***
>
> ***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."***[35] *(My emphasis).*

National Design Guide

Section C2 relates to valuing heritage, local history and culture and states:

> ***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."***[36]
>
> ***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."***[37]

It goes on to state that:

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[34] DLUHC, *PPG*, paragraph 007, reference ID: 18a-007-20190723.

[35] DLUHC, *PPG*, paragraph 018, reference ID: 18a-018-20190723.

[36] DLUHC, *NDG*, para. 46.

[37] DLUHC, *NDG*, para. 47.

"Well-designed places and buildings are influenced positively by:

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.***

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century.*"*[38] *(My emphasis).*

Local Planning Policy

Applications for Planning Permission and Listed Building Consent where relevant, within St Neots, Huntingdonshire are currently considered against the policy and guidance set out within the Huntingdonshire's Local Plan to 2036 (adopted May 2019).

Huntingdonshire's Local Plan to 2036 makes reference to the Historic Environment in Policy LP34. Elements of relevance to the current scheme comprise:

> ***"Heritage Assets and their Settings***
>
> ***Great weight and importance is given to the conservation of heritage assets (see 'Glossary') and their settings. The statutory presumption of the avoidance of harm can only be outweighed if there are public benefits that are powerful enough to do so.***
>
> ***A proposal will be required to demonstrate the potential for adverse impacts on the historic environment. Where investigations show that impacts on heritage assets or their settings, whether designated or not, are possible a heritage statement will be required, in a manner proportionate to the asset's significance, that:***
>
> ***a. assesses all heritage assets and their settings that would be affected by the proposal, describing and assessing the significance of each asset and its setting to determine its architectural, historical or archaeological interest;***

[38] DLUHC, *NDG*, paras. 48-49.

b. sets out how the details of the proposal have been decided upon such that all adverse impacts are avoided as far as possible, or if unavoidable how they will be minimised as far as possible;

c. details how, following avoidance and minimisation, the proposal would impact on the significance and special character of each asset;

d. provides clear justification for the proposal, especially if it would harm the significance of an asset or its setting, so that the harm can be weighed against public benefits; and

e. identifies ways in which the proposal could make a positive contribution to, or better reveal the significance of, affected heritage assets and their settings.

Conversion, Alteration or Other Works to a Heritage Asset

Additionally, where a proposal is for conversion, alteration, other works to a heritage asset or within its setting it must be demonstrated that the proposal:

f. protects the significance of designated heritage assets and their settings by protecting and enhancing architectural and historic character, historical associations, landscape and townscape features and through consideration of scale, design, materials, siting, layout, mass, use, and views both from and towards the asset;

g. does not harm or detract from the significance of the heritage asset, its setting and any special features that contribute to its special architectural or historic interest and the proposal conserves and enhances its special character and qualities;

h. respects the historic form, fabric and special interest that contributes to the significance of the affected heritage asset;

i. will conserve or enhance the quality, distinctiveness and character of the affected heritage asset; and

j. contributes to securing the long-term maintenance and management of the heritage asset.

The Council will consider the significance of a designated heritage asset and where there is less than substantial harm, this will be weighed against the public benefits of the proposal.

Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. Where a non-designated heritage asset would be affected a balanced judgement will be reached having regard to the scale of any harm and the significance of the heritage asset.

Conservation Areas

A proposal within, affecting the setting of, or affecting views into or out of, a conservation area should preserve, and wherever possible enhance, features that contribute positively to the area's character, appearance and setting as set out in character statements or other applicable documents. A proposal should:

k. minimise negative impact on the townscape, roofscape, skyline and landscape through retention of buildings/ groups of buildings, existing street patterns, historic building lines and land form;

l. retain and reinforce local distinctiveness with reference to height, scale, massing, form, materials and plot widths of the existing built environment; as well as retaining architectural details that contribute to the character and appearance of the conservation area; and

m. where relevant and practical, remove features that are incompatible with or detract significantly from the conservation area."

Appendix 5: Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[39]

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.[40]

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.[41] These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.[42]

The *PPG* provides further information on the interests it identifies:

> ***Archaeological interest:*** *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
>
> ***Architectural and artistic interest:*** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
>
> ***Historic interest*:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for

[39] DLUHC, *NPPF*, Annex 2.

[40] Historic England, *GPA:2*.

[41] Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see idem pp. 28–32.

[42] DLUHC, *NPPF*, *Annex 2*; DLUHC, *PPG, paragraph 006, reference ID: 18a-006-20190723*.

communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.[43]

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report. [44]

Listed Buildings are generally designated for their special architectural and historic interest.

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Listed Buildings will be discussed with reference to the building, its setting, and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

Designated heritage assets of the highest significance, as identified in paragraph 206 of the NPPF, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 72 of the NPPF;[45]

Designated heritage assets of less than the highest significance, as identified in paragraph 206 of the NPPF, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);[46] and

Non-designated heritage assets. Non-designated heritage assets are defined within the PPG as "*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets*".[47]

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

[43] DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

[44] Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

[45] DLUHC, *NPPF*, para. 206 and fn. 72.

[46] DLUHC, *NPPF,* para. 206.

[47] DLUHC, *PPG*, paragraph 039, reference ID: 18a-039-20190723.

Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of designated heritage assets and non-designated heritage assets, specifically with regard to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

> ***"…the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative assessment using professional judgement is inevitably involved."***[48]

This assessment of significance adopts the following grading system:

> **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.
>
> **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.
>
> **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of significance and are areas and elements that have potential for restoration or enhancement through new work.

Setting and significance

As defined in the NPPF:

[48] International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

> ***"Significance derives not only from a heritage asset's physical presence, but also from its setting."***[49]

Setting is defined as:

> ***"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."***[50]

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of "*what matters and why*".[51]

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

> ***Paragraph 25 – "But – again in the particular context of visual effects – I said that if "a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's***

[49] DLUHC, *NPPF*, Annex 2.

[50] DLUHC, *NPPF*, Annex 2.

[51] Historic England, *GPA:3*, pp. 8, 11.

experience of the listed building in its surrounding landscape or townscape" (paragraph 56)".

Paragraph 26 – "This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, "the historic relationship between places". Historic England's advice in GPA3 was broadly to the same effect." [52]

Assessment of harm

Assessment of any harm will be based on a consideration of each element of the proposals and articulated in terms of the relevant policy and law. For Listed Buildings, this means assessing whether the proposals preserve the building, its setting and any features of special architectural or historic interest, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

Substantial harm or total loss. It has been clarified in a High Court Judgement of 2013 that this would be harm that would "*have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*";[53] and

Less than substantial harm. Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." [54]

[52] Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

[53] Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

[54] DLUHC, *PPG*, paragraph 018, reference ID: 18a-018-20190723.

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

It is also possible that proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed Building, "*preserving*" means doing "*no harm*".[55]

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".[56] Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".[57] Of particular relevance is the checklist given on page 13 of *GPA:3*.[58]

It should be noted that this key document also states:

> ***"Setting is not itself a heritage asset, nor a heritage designation…"***[59]

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

> ***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***[60]

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.[61]

Benefits

[55] R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

[56] Historic England, *GPA:2*, p. 9.

[57] Historic England, *GPA:3*, p. 8.

[58] Historic England, *GPA:3*, p. 13.

[59] Historic England, *GPA:3*, p. 4.

[60] Historic England, *GPA 3.*, p. 8.

[61] Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

Proposals may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

The *NPPF* (at Paragraphs 207 and 208) requires harm to a designated heritage asset to be weighed against the public benefits of the proposals.[62]

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 207 to 209.[63]

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

> ***"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***
>
> ***Examples of heritage benefits may include:***
>
> - ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
> - ***reducing or removing risks to a heritage asset***
> - ***securing the optimum viable use of a heritage asset in support of its long term conservation."***[64]

Any "*heritage benefits*" arising from the proposals, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

[62] DLUHC, *NPPF,* paras. 207 and 208.

[63] Including - Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); DLUHC, *NPPF,* paras. 207 and 209.

[64] DLUHC, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

Appendix 6: Hemingford Park Hall List Entry

Heritage Category: Listed Building

Grade: II*

List Entry Number: 1330770

Date first listed: 23-Oct-1951

Date of most recent amendment: 04-Nov-1982

List Entry Name: HEMINGFORD PARK HALL

Statutory Address 1: HEMINGFORD PARK HALL, RIDEAWAY

County: Cambridgeshire

District: Huntingdonshire (District Authority)

Parish: Hemingford Abbots

National Grid Reference: TL 27615 70942

Details:

HEMINGFORD ABBOTS RIDEAWAY 1. 5140 (west side) Hemingford Park Hall (formerly listed as The Hall) TL 27 SE 6/16 24.10.51 II* GV 2. 1842-43. Built for Rev J Linton by Decimus Burton. Yellow brick country house. Hipped slate roof with modillion eaves cornice and central pediment to west. Two-storeys. Three window range of hung sashes with glazing bars. Slightly projecting central bay with flat-roofed portico with pilasters and two columns of Doric order. Central double doors with rectangular fan light and side lights. Modern terrace to right hand. Interior has open string stair of turned balusters with guilloche band add egg and dart moulding to string support and arcade of Doric columns. Two pilasters and two columns of Composite order in arcade at landing. Original doors, cornice mouldings, and central lamp bosses. Rear stair-case intact. Source Colvin.

Listing NGR: TL2761570942

Legacy System number: 53954

Legacy System: LBS



Appendix 7: Conservation Area Analysis Map



A. Parish Church of St Margaret



C. High Street



B. Royal Oak Lane

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Figure 1. Key (in full) to Symbols used on the analysis plans



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Our Ref: A4620
Your Ref: 25/01248/FUL
24 September 2025

Mr Lewis Tomlinson
Planning Department
Huntingdonshire DC

By email only: Lewis.Tomlinson@huntingdonshire.gov.uk

Dear Lewis,

Appn: 25/01248/FUL – Change of Use from Dwelling (Use Class C3) & Agricultural Land to a wellness centre (Class E) and wedding and events venue (Sui Generis) with guest sleeping accommodation and parking – Hemingford Park, Common Lane, Hemingford Abbots

1. Further to the receipt of the letter from Richard Buxton Solicitors on behalf of the Hemingford Abbots Parish Council, the following points are raised to assist Members of the Planning Committee.

2. Attached to this letter is an addendum to the Heritage Statement produced by Jon Lowe Heritage, which considers the Ridge and Furrow in a heritage context. It is hoped that this will assist Members further by providing all the information they might need. Its conclusions are clear: there is no harm whatsoever to the ridge and furrow arising from the proposed change of use. Moreover, there will be a heritage benefit from the change of use.

Current lawful position

3. The site remains in agricultural use. The ridge and furrow survives only because the land has been maintained as grassland rather than ploughed. In planning terms, the land is not designated or subject to any statutory or policy protection. A wide range of normal agricultural activities can therefore lawfully take place without the need for planning permission. This includes the movement of heavy agricultural machinery across the field and the grazing of livestock, both of which can create as much or more ground impact than the occasional visitor activity proposed.

4. Importantly, it would also be lawful to plough or reseed the land, which would remove the ridge and furrow formation altogether. This has evidently happened in the wider landscape,

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where most examples of ridge and furrow have already been lost as a result of routine agricultural management. The continued survival of the earthworks at this location is therefore incidental and contingent on past and current land management choices, not secured by planning control. The appropriate baseline against which the current application must be assessed is that this is working farmland, not a curated or policy or statutorily protected heritage landscape.

5. The land is actively managed for hay production and is expected to continue in this use. This is a routine and lawful agricultural practice which requires the use of tractors and other heavy machinery to cut, turn, rake and bale the grass each season, followed by the removal of bales by tractor and trailer. These operations take place annually and are an inherent part of the ongoing management of the land.

6. The ridge and furrow earthworks have persisted in spite of this repeated agricultural activity, which is far more intensive than the occasional visitor movements associated with the proposed use. The evidence of survival under continuous hay production makes clear that incidental pedestrian activity will have no measurable impact on the physical form or legibility of the ridge and furrow.

Permitted Development Rights

7. In addition to the ongoing agricultural use, Part 4 of the General Permitted Development Order (as amended) allows the land to be used for up to 28 days each year for temporary events. Such use could include the erection of marquees, temporary parking and pedestrian or vehicular activity across the grassland, with no planning control or ability for the Council to regulate heritage impacts. In practice, this fallback position represents a greater risk to the ridge and furrow than the present application, because activities and structures could lawfully be placed directly on the land. By contrast, the current proposal concentrates the events on the Hall itself and vehicle movements to the existing lawful track, thereby offering the Council a greater degree of certainty and control over how the land is used.

Proposed use

8. Although the whole estate falls within the application site boundary and will form part of the planning unit for the proposed use, the ridge and furrow areas will continue to be maintained in the same manner as at present as part of the site's overall management. This management includes the cutting and baling of hay, undertaken seasonally with agricultural machinery, to keep the grassland in good condition. These operations are part of the wider upkeep of the estate rather than a continuation of a separate agricultural use. No construction or physical alteration is proposed on the ridge and furrow itself, and visitor activity associated with the new use will be concentrated within Hemingford Park Hall, with access provided via the established lawful track.

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9. As a result, the ridge and furrow will continue to be maintained in the same way it has been for many years and will remain visible within the parkland. The limited and incidental presence of guests on the land will be insignificant compared to the ongoing agricultural management regime. The proposal therefore allows the ridge and furrow to survive in its present form, without material impact on its physical integrity or legibility.

Conclusions

10. This note and the Heritage Statement Addendum have been prepared to assist Members in reaching a decision when this application is to be considered at Committee. The Heritage Statement Addendum applies the appropriate methodology to the assessment of the significance of the ridge and furrow. It concludes that there is no harm caused by the proposed change of use, rather there will be a heritage benefit through the enhancement to the amenity value from the increased exposure to the visitors of the venue.

11. In conclusion, the application represents a heritage-sensitive approach to the management of the estate. While the agricultural use of the land will cease as a matter of planning law, the ongoing management of the grassland will ensure that the ridge and furrow continues to be maintained and visible within the parkland. By concentrating activity within the Hall and restricting access to the established track, the proposal avoids any material impact on the earthworks themselves. In this way, the change of use secures the continued survival of the ridge and furrow as part of the wider landscape, in a manner which is preferable to the lawful alternatives available.

Yours sincerely,

Max Short LLB(Hons) LLM MRTPI
Planning & Development Consultant
max@artisan-pps.co.uk

Heritage Statement Addendum

Hemingford Park, Hemingford Abbots, PE28 9AS

On behalf of Dr Phil Kaziewicz

September 2025 | Project Ref. 00293 | V.2

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Introduction

1. This Heritage Statement Addendum report provides Huntingdonshire District Council (HDC) with an assessment of the ridge and furrow at Hemingford Park (the Site), a country estate which contains the Grade II* Hemingford Park Hall, a Grade II listed stables and coach house, and a Grade II listed gate lodge, as well as a number of ancillary structures and access roads.

2. The report serves as an addendum to the Heritage Statement (Jon Lowe Heritage Ltd, July 2025) submitted as part of a planning application (ref. 25/01248/FUL) for a change of use from dwelling (Use Class C3) & agricultural land to wellness centre (Class E) and wedding and events venue (sui generis). It has been prepared on behalf of the applicant, Dr Phil Kaziewicz, in response to representations made to HDC by Richard Buxton Solicitors (RBS) acting on behalf the Parish Council. RBS assert that the remains of ridge and furrow within the application site are a non designated heritage asset that has not been properly assessed and considered.

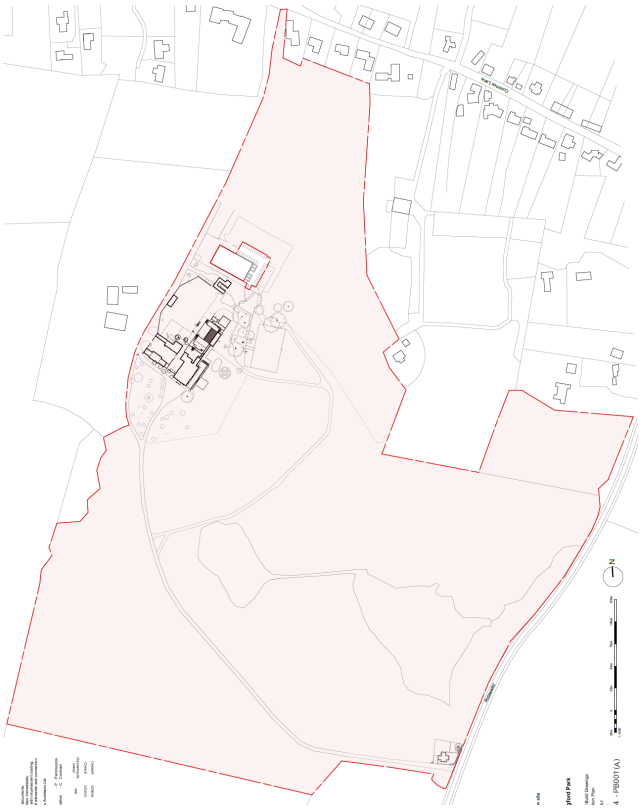


Figure 1: Plan view of Hemingford Park, delineated in red, and listed structures shaded blue.

3. In accordance with the requirements of Paragraph 207 of the National Planning Policy Framework (revised 2024), this statement proportionately describes the significance of the ridge and furrow potentially affected. It goes on to appraise the effects of the proposals upon that significance and concludes that the proposed change of use would not cause harm and is thereto sympathetic in its effects and fully in accordance with national and local planning policy.

4. Further, it supports the statutory obligation on HDC at Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990, to *"pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas*", namely the Hemingfords Conservation Area. In respect of listed buildings, it supports HDC in their duty at Section 66 of the Act, namely to have *"have special regard to the desirability of preserving the building or its setting or any features of special architectural interest which it possess".*

The Site

5. Information about the Site is set out in the Heritage Statement. In summary, Hemingford Park Hall is a large Grade II* listed country house set in the extensive grounds and parkland of Hemingford Park, located to the south-west of the village of Hemingford Abbots. The house and its Grade II listed ancillary structures date from the early-mid-19th century when farmland was acquired and developed to form a private residence and estate. The Decimus Burton designed house was added to the statutory list in 1951 with its ancillary buildings being listed in 1982.

6. Within the private enclosed parkland that forms the present day estate are the partial remains of

ridge and furrow. The earthworks are located to the south east of the house, situated between Rideaway and the sweeping drive leading to the house from it. The parkland is contemporary with the house and, as was typical and popular of the era, includes planted trees to naturalise the former farmland. In addition, the parkland includes two large ponds, recorded on historic Ordnance Survey maps as 'The Lake' and 'Upper Fish Pond', that have truncated the ridge and furrow.

7. The estate boundary is defined by fencing and hedges with fencing defining gardens, paddocks and open parkland. Modern additions within the parkland include agricultural buildings, a horse walker and a manège. Prior to a 1920s sale, the estate's land holding had included agricultural land to the south and west of the present estate. To the east of Hemingford Park Hall, and projecting into the previously open primary vista from Hemingford Park Hall is the private grounds of the former cricket pavilion.

8. The partially surviving ridge and furrow within the application site is located between and immediately to the north of the ponds. Further ridge and furrow survives immediately to the west of the application at Home Farm, and on land to the west of Hemingford Abbots and east of Cow Lane with the Godmanchester Eastside Common(see figure 2).

9. The Site is located within the Hemingfords Conservation Area, a designated heritage asset with a boundary that includes the settlements of Hemingford Abbots and Hemingford Grey, together with some of the surrounding landscape, including all of the aforementioned ridge and furrow. The presence of ridge and furrow within Hemingford Park and Home Farm are recognised within The Hemingfords Conservation Area Character Assessment (HDC, published June 2008), however the larger, more complete and clearly visible ridge and furrow to the west of the village is erroneously not.

Context and Background

10. Hemingford Park has been extended with a link detached pool house following grant of planning permission and listed building



Figure 2:Aerial view (Google Earth) showing areas of surviving ridge and furrow; 1. Hemingford Park; 2. Home Farm, 3 Land to east of Cow Lane and west of Hemingford Abbots (part of Godmanchester Eastside Common.

consent (ref: 1400578FUL & 1400579LBC, approved 20 Aug 2014 and 24/02342/HHFUL & 24/02343/LBC, approved 14 Feb 2025).

11. RBS assert that the ridge and furrow is a non-designated heritage asset. Heritage Assets are defined in the NPPF glossary (2024) as *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."* Whilst HDC have not formally identified any of the ridge and furrow to Hemingford Abbots former open field system as a heritage asset, it merits consideration as a non designated heritage asset in the planning decision. In defining the asset, it is our opinion that the non designated heritage asset is a single entity that includes the three partially surviving areas of ridge and furrow within the conservation area as they collectively represent survival of a single medieval open field system affiliated with Hemingford Abbots as a single settlement.

Ridge and Furrow

12. Ridge and furrow refers to earthworks which were originally formed by ploughing. They were in use between the Medieval and Post-Medieval periods and examples can still be found surviving in this region and more extensively throughout the Midlands. Typically they formed part of an open field system surrounding villages with the surviving examples at Hemingford Abbots being upon the fertile alluvial ground, rather than the heavier clays to its south. Survival of ridge and furrow is patchy throughout the Midlands due to modern mechanical ploughing and field enclosures. Good examples of ridge and furrow earthworks are becoming increasingly rare.

13. The earthworks are formed of parallel earthen ridges and shallow troughs (furrows) on the surface. Ploughing with a single-sided plough, drawn by horses, consistently turned soil towards a central point. This method built up the ridges and, in the process, created a self-draining seedbed for crops. Lines of ridges could be used to divide up land between different people and on occasion it is possible to pick out footpaths, or lanes, running between areas of parallel ridges. The presence of ridge and furrow can often be an indicator that a settlement is nearby, in this case the village of Hemingford Abbots.

Previous Assessments

14. An assessment of the Site and its heritage values and sensitivities was undertaken by Jon Lowe Heritage Ltd as part of numerous past planning applications. These past heritage statements were produced between July 2021 and November 2024 with earlier assessment and reporting from 2013 having been undertaken by Jon Lowe under a different company. These documents have informed this heritage statement.



Figure 3: Source Historic England Archive (RAF photography) raf_cpe_uk_1952_fs_2263 flown 25 March 1947

This shows (edged in green) the ridge abd furrow at Home Farm, immediately to the east of the application site. To the north of the River Great Ouse is a well preserved open field system or ridge and furrow of Houghton

Significance

15. Existing national policy guidance for archaeology and historic environment (the NPPF, 2024) enshrines the concept of the 'significance' of heritage assets. Significance is defined in the NPPF as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

Assessment of Importance for Ridge and Furrow (Hall/English Heritage methodology, 2001)

16. Extensive assessment of the significance and survival of ridge and furrow has been carried out throughout the Midlands by English Heritage (now Historic England) as part of their Monument Protection Programme. Their study area focussed on Northamptonshire but extended to Warwickshire and Gloucestershire, in the west, and parts of Cambridgeshire, in the east. The Site falls within that broad study area. Further detailed assessment was carried on behalf of Northamptonshire County Council and resulted in a methodology for the assessment and management of this earthwork type (Hall, D. 2001. Turning the Plough: Midland Open Fields: Landscape Character and Proposals for Management. English Heritage/ Northamptonshire County Council.), a system that has been used for the assessment of ridge and furrow beyond the detailed study area.

17. The Hall assessment methodology for assessing the relative importance of ridge and furrow earthworks assigns the following to each criteria; 1 = 'Low/poor', 2 = 'Medium', and 3 = 'High/good'. The criteria are considered below.

18. Group Value (Association): The ridge and furrow within Hemingford Park form part of a wider surviving group of what was likely the open field system relating to Hemingford Abbots. However, as fragmentary remains, with no relationship to features such as house plots, boundary ditches, hollow ways or other typically experienced features, the isolated remains within Hemingford Park are graded 'Low', (Low: with a single monument or feature, excluding the settlement), or none at all (Hall 2001). Score Low.

19. Survival: Hall notes that the extent of a field system is a major part of its importance and that a single modern field with ridge and furrow is normally of limited significance unless there are particularly rare features, or unless it lies next to a settlement. The extent of survival of the Hemingford Abbots open field system has not been archaeologically mapped and is incorrectly represented in the conservation area appraisal. Hall classifies Poor survival as 'field system that extends to less than 0-10% of the township and/or having some post enclosure damage'. Appraised in isolation the surviving remains of ridge and furrow within Hemingford Park would be deemed 'Poor' due to the enclosure within the 19th century park and the damage caused by the main driveway, planting of trees and excavation of the ponds. In addition, the area of ridge and furrow has been subject to the landscape management regime (grazing, paddock, tractor mowing, fences) as part of the parkland to Hemingford Park Hall. Score Poor.

20. Potential: Hall notes that the potential of surviving ridge and furrow normally lies with its extent, physical detail, historical documentation and relationship to the settlement. Potential may include the archaeological evidence of the origin or development of the system and therefore the better the conditions the greater the potential. Likewise, relationship between the ridge and furrow and the water source may be important if waterlogging aids preservation. Hall defines a Low value where the ridge and furrow is divorced from wet features and not lying on light soil and where it has a significant proportion of urbanisation and quarrying. A Medium value is ascribed where it lies on light soil or has wet features adjacent and the remainder of the township is intact. The ridge and furrow within Hemingford Park is assessed as having Low to Medium potential. It is divorced from the wider ridge and furrow in the locality and has no contemporaneous wet

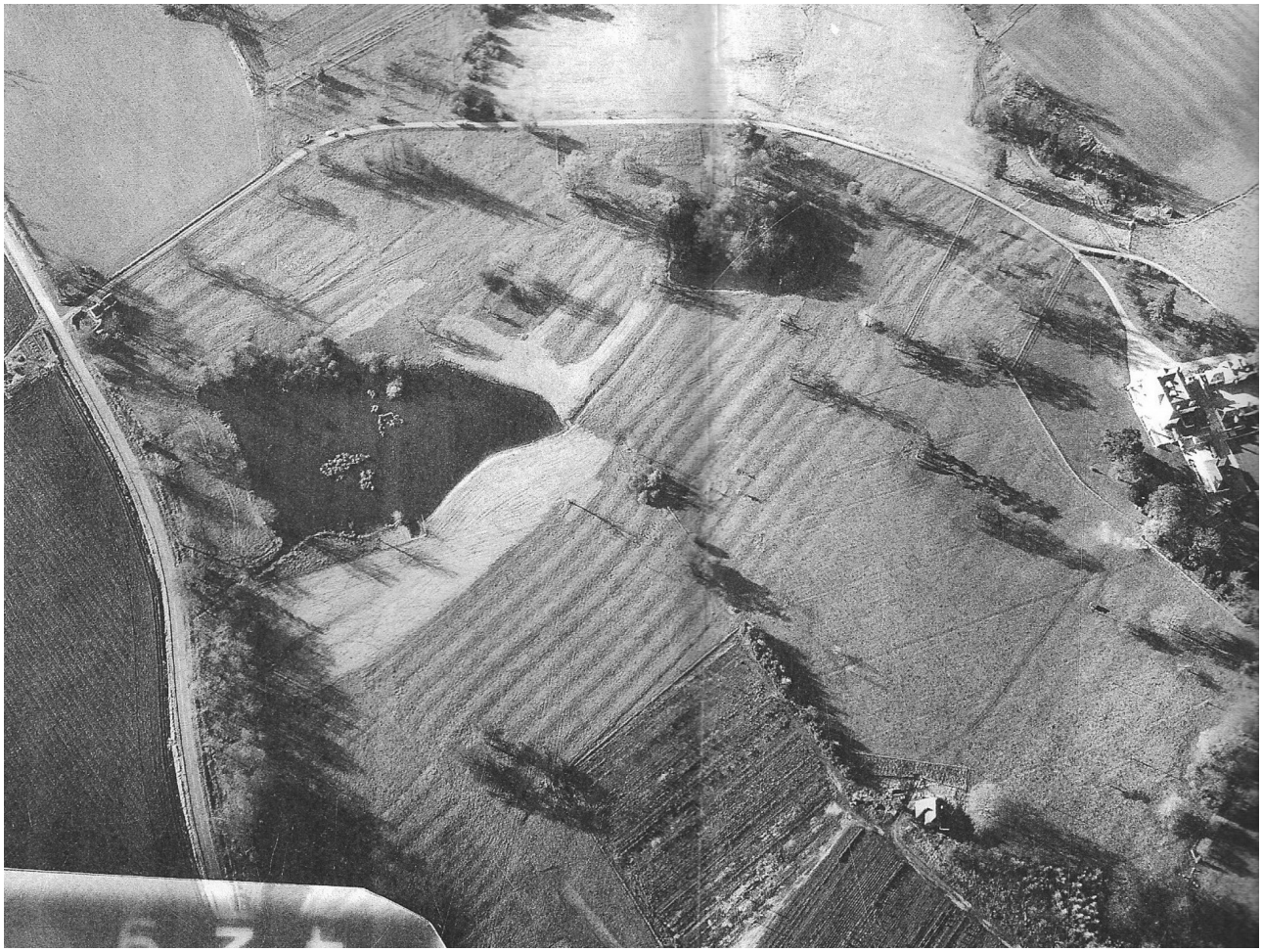


Figure 4: Historic England Archive (NMR Reference NMR_1865_429 Dated 26th November 1980)

This records the ridge an furrow within Hemingford Park and illustrates the impact of the drive, lake/pond and separately owned/managed garden to the former Cricket Pavilion (bottom centre of frame)



Figure 5: Aerial view from south. Base image © Historic England 29453_029 flown 30 June 2015

This shows crop marks in the field to the east of Rideaway. The ridge and furrow within Hemingford Park is faintly evident as part of the 19th century parkland.

features unless the pond/s are proven to pre-date Hemingford Park. The lack of ploughing due to its enclosure may result in a modest degree of archaeological value, elevating the score to a low to medium rating. Score Low to Medium.

21. Documentation (archaeological): Hall notes that the most important elements of archaeological documentation are aerial photographs, both vertical and oblique. As with most of the region and much of the country there are good high level aerial photographs taken from 1944 to 1960s by the RAF. In addition the Historic England Archives includes oblique aerial imagery from 1980 (figure 4) which record the ridge and furrow within Hemingford Park. There are no known drawn records or records that cover a longer time period that serve value to our understanding of the asset. Because of the 1980s photography, the ridge and furrow within Hemingford Park is assessed as having a Medium score, namely for 'good photographs, or adequate plans'. Score Medium.

22. Documentation (Historical): From the research on Hemingford Park Hall carried out by the author since 2013, no specific open field records, field book or terrier have been located. However, there is potential for these to survive as the research on landscape has not been exhaustive. On this basis, and assuming some record survival potential, a Low score value is given (Low: no open field records other than a late terrier). Score Low.

23. Diversity (features): The surviving ridge and furrow is fragmentary and incomplete due to truncation (ponds, ploughing) and no other features (e.g. furlongs of different size and orientation, headlands, joints, balks, grass ends, green furrows, rick places and variable ridge profiles) have been observed or recorded. As a detailed survey has not been carried out there is the potential for some features to be identified. A Low score value is ascribed (Low: examples with 0-2 of these features). Score Low.

24. Amenity value: As the ridge and furrow within Hemingford Park are publicly inaccessible due to the estate's private ownership, the earthwork remains currently have a Low score. (Low: an inaccessible and small area of fields). It could be argued that when appreciated as part of a layering of history together with Hemingford Park (the reason for its survival) and with a change of use leading to increased number of visitors enabling an increase in its exposure and appreciation, the earthwork remains have the potential for a Medium score value. (Medium: some access available; or the fields are enhanced by the additional interest of later features.) Score Low to Medium.

25. In summary, using the Hall assessment criteria an overall score of Low to Medium is found for the ridge and furrow within Hemingford Park.

NPPF Significance Assessment

26. Assessed against the interests defined in the NPPF the following judgements are offered:

27. Architectural interest: The earthworks do not draw significance from architectural interest.

28. Artistic interest: The earthworks are not of artistic interest, nor have they been captured in artistic depictions of Hemingford Park Hall or its parkland.

29. Historic interest: the ridge and furrow are of associative and illustrative historic interest. They represent part of a now truncated and fragmented open field system associated with the medieval and post medieval occupation of Hemingford Abbots. In this regard they have associative value with the surviving elements of the system beyond the application site but within the Hemingfords Conservation Area. Whilst functionally unrelated to Hemingford Park Hall, the establishment of the estate in the early -mid 19th century largely secured their survival and when experienced together have both associative and illustrative historic values.

30. Archaeological interest: All of the earthworks within the conservation area have the potential to yield information about the age, methods and use of the ridge and furrow. This gives the earthworks a modest archaeological interest.

Assessment of Proposal: Impact and Effects on Significance

31. The proposals do not include works that would physically impact, cause loss of, or diminish the extent of surviving ridge and furrow within Hemingford Park. An access track across the feature has been permitted by grant of a Lawful Development Certificate (granted on 4 September 2025 under reference 25/014151/CLED) under s.191 of the Town and Country Planning Act, 1990. Alteration or expansion of the track is not required due to the existence of passing places. Furthermore, avoidance of potential impacts (subject to need) can be avoided by the installation of traffic management systems (if necessary and subject to requisite permissions).

32. The proposals do not seek to change the openness or the features of the parkland setting which make a positive contribution to the setting of the Grade II* listed Hemingford Park Hall, or its Grade II listed ancillary estate buildings. The ridge and furrow would remain a visible and appreciable landscape feature within the parkland, sustaining their historic and archaeological interests.

33. The ridge and furrow forms part of the landscape used for the production of hay. The change of use of Hemingford Park Hall would maintain the established requirement to mow or graze those parts of the parkland in which ridge and furrow survives. These activities or actions, including use of agricultural machinery and human footfall, would not in themselves cause impacts sufficient to cause harm to the non designated heritage asset or the designated heritage assets to which they relate.

34. It is material that the other surviving parts of the non designated heritage asset of the open field system of Hemingford Abbots are exposed to uses and maintenance of equal or greater in threat than at Hemingford Park. For example, ridge and furrow within the privately owned Home Farm could lawfully be ploughed whilst that within the Godmanchester Eastside Common, to the West of Hemingford Abbots, could be openly accessed by public footfall and activity, or used for grazing (for example).

35. The retention of the ridge and furrow as part of the parkland would preserve any contribution the former agricultural landscape makes to the significance of Hemingford Park Hall, as part of its setting. Likewise, its retention would sustain any contribution made by the ridge and furrow (as an fragmentary part or collectively with the other surviving parts beyond the application site) makes to the character and appearance of the conservation area. The proposed change in use would not diminish the contributions made to the significance of either of these designated heritage assets.

Conclusion

36. Ridge and furrow are important landscape features in Britain that are recognised as holding historic and archaeological interest. Sustaining these features is a desirable objective and in the collective interest of this and future generations.

37. Detailed assessment criteria to understand the importance and interest of ridge and furrow, notably within the Midlands, has been published by English Heritage and David Hall (2001). The methodology has been applied to the fragmentary remains of the Hemingford Abbots open field system within this report and it is concluded that the its importance score is low to medium. Its incomplete nature and survival, detachment from the wider group, lack of typically affiliated features and its seclusion within a private estate limit its potential interest. Its survival can most likely be attributed to its inclusion within the parkland of Hemingford Park.

38. It is agreed that the remains of the Hemingford Abbots open field system, notably the surviving ridge and furrow, merits recognition as a non designated heritage asset. In carrying out an assessment of its importance and significance it is important to note that those remains within Hemingford Park are smaller and less complete that those surviving at Home Farm and within the Godmanchester Eastside Common (both of which are included within the Hemingfords Conservation Area but not properly mapped in its character appraisal). It follows that the scale of any impacts or their effect on the significance of the heritage asset be considered against the wider extent of the asset.

39. The significance of the ridge and furrow as a non designated heritage asset has been considered in accordance with Paragraph 207 of the NPPF. In doing so this report assists HDC in their decision making and supports their statutory duties. It is concluded that any potential impacts upon the ridge and furrow would cause no harm to designated or non designated heritage assets.

40. The application proposals seek permission for a change of use. They do not impose physical impacts nor would they diminish the contributions made by the ridge and furrow to the significance of designated heritage assets, including the Grade II* listed Hemingford Park Hall, the Grade II listed ancillary buildings, and the Hemingfords Conservation Area.

41. It is therefore concluded that the significance of the ridge and furrow within the application site, as a fragmentary remains of Hemingford Abbots' open field system, would be preserved. Arguably any increase in visitors to the Site would increase its amenity value (Hall, 2001) and exposure to the appreciation of the heritage assets.

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