Dear Councillor

DEVELOPMENT MANAGEMENT COMMITTEE - MONDAY, 16 NOVEMBER 2026

I am now able to enclose for consideration at the above meeting the following reports that were unavailable when the agenda was printed.

Agenda Item No.

LATE REPRESENTATIONS(Pages 3 - 16)

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DEVELOPMENT MANAGEMENT COMMITTEE – 16th November 2026

LATE REPRESENTATIONS SUMMARY

25/01694/OUT Outline planning application (phased development) for the erection of up to 600 dwellings including 40% affordable, a community hub site including car parking and mobility hub. Public open space including green and blue infrastructure, incorporating footpaths, cycle ways, biodiversity improvements and habitat creation; associated drainage and landscaping including new and existing trees and hedgerows, utilities and other infrastructure. All matters reserved except for means of vehicular access from Priory Hill Road and associated highways works to Mill Lane/Priory Hill/Huntingdon Road - Land Adjacent St Neots Reservoir, Priory Hill Road, St Neots

1. Additional representations

Additional representations have been received as follows:

a) 2 no. further representations from a neighbour;
b) Letters from Rowley Allotment Association and The Friends of Paxton Pits Nature Reserve in relation to the S106 Heads of Terms.

These representations are available to view in full via Public Access.

The matters raised within these representations are summarised below and an officer response is provided where relevant.

a) <u>2 no. further representations from a neighbour</u>

Two further representations from a neighbour have been received by the LPA (received 04.11.2026 and 11.11.2026). The matters raised in these

representations are summarised under the headings below and an officer response is provided.

Local Plan Sustainability Appraisal

The representations:

- Give significant weight to the Sustainability Appraisal prepared as part of the emerging Local Plan process.
- Argue that the Sustainability Appraisal identified the site as performing poorly against a number of sustainability objectives and concluded that development would not contribute positively to sustainable place-making.
- Contend that insufficient weight has been given to these findings in the officer assessment.

The application site was assessed by the Sustainability Appraisal of Sites, which represents an evidence base document for the emerging Local Plan to 2046 (the application site was assessed as ‘St Neots 1’.

The Sustainability Appraisal is one of many evidence base documents which have informed the emerging Local Plan and has not in isolation informed the emerging spatial strategy and site allocations contained within the Pre-Submission version of the Local Plan to 2046.

The application site received a limited number of negative scores within the Sustainability Appraisal. Where potential harm has been identified it relates principally to flood risk (due to the presence of flood zones 2 and 3), lack of capacity at St Neots WRC, loss of BMV agricultural land and landscape impacts.

These are all matters which have been assessed in detail as part of the current application and found to be acceptable. It is important to note that the Sustainability Appraisal was based on limited technical evidence. The suite of technical information submitted in support of this application and the views of consultees did not inform the Sustainability Appraisal assessment.

As an example, whilst the Sustainability Appraisal suggests that the site may be highly visible in longer distance views, the LVIA submitted in support of the application (which was reviewed and endorsed by the Council's Landscape Officer) confirms that this is in fact not the case (longer distance views of the site from publicly accessible vantage points are in fact very limited).

The Sustainability Appraisal can be afforded very limited weight as a material consideration in the determination of this planning application.

Archaeology

The representations:

- highlight the discovery of Iron Age archaeological remains, including evidence of settlement and associated burial activity within the area proposed for residential development.
- argue these remains are of considerable significance and that development would result in the destruction of archaeological assets.
- consider the harm arising to archaeology to have been understated.

Impacts on archaeology have been assessed at paragraphs 6.187 – 6.193 of the officer report.

The trial trenching undertaken on site was overseen by the County Archaeologist. Whilst the Iron Age archaeological remains found in the southeast corner of the site are of interest, the County Archaeologist does not consider them to be of national significance. On this basis, it is recommended that this can be adequately mitigated through full archaeological excavation (secured by condition) as opposed to preservation in situ.

This accords with NDMP HE10(2) of the NPPF which states that "Heritage assets with archaeological interest should be preserved in situ where feasible. Where an asset cannot be preserved or managed on-site, appropriate provision should be made for the investigation, understanding, recording, dissemination and archiving of that asset,

which should be undertaken by suitably-qualified individuals or organisations".

Odour from St Neots WRC

Concern is raised regarding:

- the proximity of the site to the St Neots wastewater treatment works and the robustness of the submitted odour assessment.
- odour impacts upon the usability and quality of proposed open spaces and recreational areas.
- The impact of an expanded WRC in terms of odour upon the proposed development

Odour is assessed at paragraphs 6.242 – 6.247 of the Officer report.

The Odour Modelling Assessment submitted with the application has been reviewed by the Environmental Health Officer who raised no concerns about its robustness.

The impact of odour upon green infrastructure is specifically addressed at paragraph 6.246 of the Officer report.

The odour assessment does not consider the odour impacts associated with any future expansion of St Neots WRC. This is not possible as details of any required expansion of the WRC are currently unknown.

Nevertheless, this is a matter which has been discussed between the applicant and Anglian Water during the detailed discussions which took place over the course of this application.

Anglian Water, Bloor Homes and the Council's Environmental Health Officer agree that, in principle, the WRC can be expanded without adversely impacting the residential amenity of any future residents of the proposed development.

Officers understand that in the first instance Anglian Water would seek to keep all odorous processes within the confines of the existing WRC and any expansion would house non-odorous processes. However, even if this was not feasible, the odour contours associated with a WRC are very tight to the WRC and unacceptable odour levels would not reach any

proposed housing. Anglian Water are comfortable, based on their experience of delivering waste waster facilities, that an extension to the WRC can be accommodated on the safeguarded land identified without causing harm to residential amenity. It is on this basis that they raise no objection to the proposed development in terms of safeguarding their assets.

Little Paxton Bridge

The representations state that:

- Little Paxton Bridge is already operating over capacity, and any additional traffic would worsen an existing problem.
- The CCC Transport Assessment Team has placed too much weight on future congestion being attributable to background and committed development rather than the application itself.
- Severe cumulative impacts would arise and the proposed reliance on signal optimisation is not adequate.
- The absence of planned improvements to the bridge indicates the location is not sustainable.

The representations have been reviewed by the Local Highway Authority Transport Assessment (TA) Team who remain satisfied with the applicant's assessment of forecast impacts upon Little Paxton Bridge.

The applicant's assessment reviews existing queuing patterns on the northern arm of Junction 2 - The B1041/Mill Lane signalised junction south of the bridge, and how the addition of future background and committed traffic growth and development traffic will impact passing traffic at Little Paxton Bridge to the north.

The applicant's assessment uses LinSig modelling software which is a nationally recognised model used to assess junction capacity impacts at signalised junctions. The base model for the B1041/Mill Lane signalised junction assessments is suitably representative of the observed queuing at the junction.

Whilst the TA Team's response does state that "the majority of the forecast increase in queuing on the B1041 (N) approach arm at Junction

2 is attributable to background and committed traffic, rather than traffic associated with the proposed development", such comment was included for reference purposes to indeed set out that the majority of the forecast increase in queuing on the northern approach arm of Junction 2 is not attributable to traffic associated with the proposed development.

The modelling assessment for Junction 2 indicates that the cumulative impact of additional queuing from background growth and the development could result in a queue which could impede the progress of Northbound traffic in 2036. However, the maximum queues would not be experienced across the whole peak hour and the impacts at Junction 2 and Little Paxton Bridge can be suitably mitigated to an acceptable level. Thus, with reference to the NPPF, the Highway Authority could not assert that the impacts were sufficiently 'severe' to warrant a refusal.

The Highway Authority considered local concerns regarding impacts at Little Paxton Bridge and explored several options when reviewing mitigation for Little Paxton Bridge including widening the bridge, widening the B1041 (N) approach arm at junction 2 to two lanes, and installing an additional MOVA detector loop. Of which, the two physical mitigation options were not feasible due to physical constraints, and an additional Queue detector loop on the B1041 would not provide significant benefits as it would interfere with the existing MOVA control program.

The Highway Authority consulted the County signals team when reviewing forecast impacts at Junction 2 and Little Paxton Bridge to assess ways Junction 2 can be managed to reduce queuing on the B1041 (N) approach and thus impacts to passing traffic on Little Paxton Bridge. The outcome of the consultation concluded that the existing MOVA controller at the junction would be able to sufficiently manage future queues on the B1041 (N) approach arm at Junction 2 which will help manage traffic flows across Little Paxton Bridge. Given that the forecast impacts are not expected until 3036 (i.e. 10 years from now), the County Council will continue to monitor Junction 2 and, should any issues arise in the future, the existing MOVA controller can be updated as and when necessary.

It is acknowledged that providing more green time on one arm of a signalised junction would transfer delays to another arm of the junction, the MOVA controller would only provide additional green time on the B1041 (N) arm over the period when it is needed to allow traffic to be able to pass on the bridge i.e. when queues are extending back close to the bridge. The delays on other arms will therefore be minimised.

In view of the above, the Highway Authority is not in a position to object to the proposed application.

Other off site highway impacts and NDMP TR6

- Severe cumulative traffic impacts would occur at the Mill Lane/Great North Road priority junction and B1428/Station Road/Cambridge Street/Cromwell Road double mini roundabout.
- The transport assessment evidence is inadequate or based on outdated assumptions.
- The proposal should be refused in line with NDMP TR6.

Mitigation works have been agreed between the Highway Authority and the applicant for impacts upon the Mill Lane/Great North Road priority junction and B1428/Station Road/Cambridge Street/Cromwell Road double mini roundabout (as set out in paragraph 6.86 of the Officer report).

The Highway Authority are satisfied with the applicant's Transport Assessment.

Having regard to local and national planning policy, the Highway Authority have confirmed that there is no sound reason to justify refusal of the application on the basis of highway impacts or safety.

Bat surveys

The representation states that:

- Insufficient ecological information is available to assess impacts on bats and determine the application.

- Necessary bat surveys have not been completed and that sufficient information is not available to properly assess impacts upon bats
- Deferring surveys would be contrary to ODPM Circular 06/2005 and case law (Woolley v Cheshire East BC).
- The Council cannot be satisfied that favourable conservation status will be maintained without further survey work.

This matter has been considered in detail by the Council's Ecologist (Place Services Ecology), who has reviewed the additional representations received and is familiar with the guidance and case law quoted within.

The Council's Ecologist has applied their professional judgement and is satisfied that the position taken (as set out within the Officer report to DMC) is justified.

Importantly, no bat roosts have been identified on the application site. There is no requirement for a licence from Natural England.

There is a single tree on site which contains features that may be suitable for bat roosts, however, a climbing survey undertaken found no evidence of bats using this tree. Regardless of the time of year a climbing inspection is undertaken, any evidence of bats having used the features would be overtly obvious to a professional ecologist. The Council's Ecologist is satisfied that the ecologist who undertook the climbing inspection on behalf of the applicant is well qualified and experienced enough to undertake the survey.

The professional judgement of the applicant's and the LPA's ecologists is that although technically suitable for bats, the features within tree T43 are not likely to be important features for bats (this could be for any number of reasons, including for example their location not being suitable for any local population of bats).

Deferring further surveys is not contrary to ODPM Circular 06/2005 and the case law quoted is not directly applicable to the current situation. ODPM Circular 06/2005 specifically states: "*bearing in mind the delay and cost that may be involved, developers should not be required to*

undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development."

Model planning conditions used by the Planning Inspectorate confirm that further surveys can be secured by planning conditions.

In conclusion, the Council's Ecologist remains satisfied, having reviewed the additional representations, that the LPAs position on bats is justified and lawful (the LPA has sufficient certainty on likely bat impacts). The Council's Ecologist also remains satisfied with the condition they recommended to secure the further surveys of tree T43, however, to make 100% clear that further surveys of T43 are required prior to the commencement of development, a specific standalone (model) condition could be included to specifically separate out the bat survey requirement from other species/wider ecological mitigation measures being secured.

Landscape / Design (NPPF DP3 and Local Plan Policies LP2, LP10 and LP11)

The representation states that:

- The proposal would cause significant harm to the historic landscape character and the rural setting of St Neots including the introduction of artificial light.
- The application site is identified as being isolated in terms of landscape and topography – the rural character is a clear landscape boundary separating the village of Great Paxton and town of St Neots.
- Dwellings of up to 3 storeys are inappropriate in this location.

Landscape impact is addressed at paragraphs 6.115 – 6.128 of the Officer report.

Of note, the Council's Landscape Advisor has no objection in principle to the proposed residential development, which they consider can be successful assimilated into the existing townscape/landscape. Significant open space will remain between the village of Great Paxton and the town of St Neots, therefore, the Council's Landscape Advisor raised no concerns about settlement coalescence or settlement identity.

The realignment of Priory Hill Road does result in the loss of mature landscape features (albeit no high quality (Category A) trees are proposed for removal) and an impact upon the historic parkland

character. This harm is a matter weighed in the overall planning balance at section 8 of the Officer report.

Reference is made to 3 storey dwellings; however, it must be noted that this is an outline planning application with all matters reserved except access. Dwelling heights is therefore a matter for future determination; however, the submitted Building Heights Parameter Plan makes reference to a maximum of 2.5 storeys and general compliance with the principles of the Parameter Plans would be secured by condition.

Likewise, details of external lighting would be secured by condition and a lighting scheme which is sensitive to biodiversity is required. It is not considered that the proposal would result in unacceptable levels of artificial light having regard to the requirements of NDMP P3 in this regard.

Impacts on St Neots conservation area (HE9)

The representations suggest that the proposal fails to meet the requirements of NDMP HE9 due to the harm arising to St Neots conservation area.

Impacts upon St Neots conservation area are assessed at paragraphs 6.179 – 6.186, including as assessment against NDMP HE9. As required by local and national planning policies, the harm arising to the setting of the conservation area is weighed against the public benefits of the proposal at section 8 of the Officer report.

Loss of agricultural and impact upon tenant farmer

The representations suggest that the proposal fails to meet the requirements of NDMP N2 and P4 due to the loss of agricultural land and impacts upon the existing tenant farmer/farm business.

Loss of agricultural land and NDMP N2 are addressed at paragraphs 6.15 – 6.25 of the Officer report.

Impacts upon the agricultural tenant are addressed at paragraphs 6.281 – 6.285 of the Officer report including reference to NDMP P4 of the NPPF.

Both of these harms are weighed in the overall planning balance at section 8 of the Officer report.

Pressure on local infrastructure

The representation suggests that the proposal would result in unacceptable pressure upon local infrastructure including schools and GPs.

As set out at Section 7 of the Officer report, S106 contributions are to be secured towards local infrastructure, including local schools and GP surgeries to mitigate the impacts of the proposed development.

NPPF NDMP DM4

The representation suggests that determination of the application would undermine the emerging Local Plan. It is contended that the impacts of this development would make emerging Local Plan allocations unsound, particularly in relation to the capacity of local infrastructure including St Neots WRC.

The status of the Huntingdonshire emerging Local Plan to 2046 is set out at paragraph 4.8 of the Officer report, including a consideration of NDMP DM4.

NPPF NDMP S5

The representation states that the proposal is not:

- within walking distance of St Neots Railway station;
- well related to the settlement and its surroundings;
- capable of being accommodated by existing availability of infrastructure.

An assessment against NDMP S5(1)(j)(i) has been undertaken at paragraphs 6.40 – 6.50 of the Officer report.

Whilst NDMP S5(h) makes reference to residential development which would be within reasonable walking distance of a ‘well-connected station’, St Neots Railway Station does not qualify under the NPPF definition of a

'well-connected station'[1] The applicable paragraphs of NDMP S5 for this application are therefore S5(1)(j)(i).

As set out at paragraph 6.43 of the Officer report, the tests within NDMP S5(1)(j)(i) are matters of planning judgement. For the reasons set out in the Officer report, officers consider that the site is physically well related to an existing settlement and of a scale which can be accommodated, taking account of existing or proposed infrastructure.

Planning balance

The representations consider:

- that the weight afforded to a number of the benefits have been overstated within the planning balance, including the weight afforded to sustainability, housing delivery, biodiversity enhancements, public open space, Anglian Water safeguarded land and the proposed community hub.
- some harms have been missed from the planning balance: harm to bats (due to a lack of surveys), loss of archaeological assets, the site not being within walking distance of St Neots train station.

The weight afforded to benefits and harm in the overall planning balance is a matter of planning judgement. In some instances, the NPPF directly specifies the level of weight which should be afforded to some matters – where this is the case, the Officer report has directly acknowledged this.

The additional harms identified by the objector have not been included in the planning balance by officers for the following reasons:

- As set out in detail above (under the heading 'Bat Surveys') and within the Officer report, no bat roosts have been identified on the application site. The LPA's ecologist is satisfied that subject to

[1] Annex B of the NPPF defines a 'well-connected station' as: Railway stations and underground, tram and light rail stops located within a top 80 Travel to Work Area located partially or fully within England by Gross Value Added (GVA)72 and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by at least four trains or trams per hour overall, or at least two trains or trams per hour in any one direction. St Neots is not located within a top 80 Travel to Work Area.

mitigation (secured by conditions) the proposal will not result in harm to bats.

- As set out in detail above (under the heading 'Archaeology'), and within the Officer report, the County Archaeologist is satisfied that subject to mitigation (secured by conditions) the proposal will not directly harm any non-designated heritage assets of archaeological significance.
- As set out above, St Neots Railway Station does not qualify under the NPPF definition of a 'well-connected station, NDMP S5(h) does not therefore apply. The Highway Authority consider that reasonable walking distance to a train station is between 800m and 1.2km. Whilst the application site is nearer the upper end of this range, it is considered well-located for access to the train station by foot and cycle, hence off site highways works, include widening the path on the southern/western side of side of Priory Hill Road/Hawkesden Road, are proposed to further facilitate sustainable travel to the station.

b) <u>Letter from Rowley Allotments Association and The Friends of Paxton Pits Nature Reserve</u>

Paragraph 7.6 of the Officer Report Officer states: "*It is understood that the applicant has entered into discussions with Rowley Allotment Association and Paxton Pits Nature Reserve / Friends of Paxton Pits Nature Reserve regarding the land proposed for allotments and Conservation Island. The transfer mechanism and nominee(s) will be considered fully within the detailed S106 drafting, but it is welcomed that conversations with these parties have taken place*."

Letters have been received from the Rowley Allotments Association and The Friends of Paxton Pits Nature Reserve which confirm their respective interest in the land proposed as allotments and the land proposed as 'Conservation Island' nature reserve should this application be approved.

2. Corrections to Committee report

- Harm to the setting of St Neots conservation area (afforded substantial weight) should have included in the list of harms at 8.15. This does not change the conclusions reached at paragraphs 8.17 – 8.19.
- The list of offsite highway mitigation works included at paragraph 6.92 of the report erroneously included works which were discussed with, but ultimately ruled out as unfeasible by the Local Highway Authority. Paragraph 6.92 is therefore amended as follows with **additions** (**bold**) and removals (scored) shown below:

6.92 Where the Travel Audit has identified existing deficiencies in routes to key local education, employment, and leisure destinations, the applicant is proposing off site mitigation as follows:

• Footpath widening of Priory Hill Road/Hawkesden Road to 3m – this width currently varies between 2.0 - 2.5m wide;

• **Improve crossing facilities and provide tactile paving at** Hawkesden / Longsands junction ~~to become a cycle priority junction~~;

• Zebra crossing to assist key walking movements on Longsands Road;

~~• Provide approximately 300m of fencing to prevent anti-social parking adjacent Priory Junior School on the eastern and western verges;~~

• Tactile paving to be added to assist crossing of minor road junctions along Longsands Road;

~~• Reduce junction widths and add tactile paving to Longsands Road / Rowley Road junction and Longsands Road / Raven Close junction.~~