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St Marys Street
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GamPlan Associates

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Dear Marie

**ERECTION OF BESPOKE-DESIGNED WHEELCHAIR-
FRIENDLY BUNGALOW & ASSOCIATED WORKS
49 ST NEOTS ROAD, EATON FORD, ST NEOTS PE19 7BA
HDC REF 24/0336/FUL**

I write with reference to the above application and having now had the chance to read your report being presented to the forthcoming DMC meeting wanted to make the following points for inclusion in your 'late reps' update to members and for consideration on the night as three minutes is not sufficient to make a meaningful representation of the proposals.

- As you know (and as is detailed in both the application submission and the supporting letter from the applicant explaining their family circumstances, again attached to this letter for ease of reference) the specialist accommodation proposed is to provide a new home for the applicant's elderly and infirm father. As such (and as we have discussed at length) the reasons why that means a district-wide search for a plot is inappropriate, with a much more joined-up approach being to allow the family to be on-hand to provide any care, comfort or company as may be desired.
- I welcome your references to **"the highly sustainable location"** and **"appropriate"** of the site (para 7.2) and recognition of the bespoke nature of the design, **special circumstances** of the applicant (para 7.31) and general policy support for utilising such sites to address such specialist housing need. Equally, confirmation of the strong support from the

Town Council and absence of any objection from the Environment Agency is also noted (para 7.29).

- In consideration of flood risk, and where the site & scheme-specific FRA and Sequential Test show there is no identified risk and no 'better' appropriate sites available, I wonder why you have chosen to highlight a third-party 'concern' (para 7.3) rather than actual evidence and data
- I also question why when considering proposals for a bungalow in an area where broad-brush large-scale generic map colouring suggests there could be a flood risk but site & scheme-specific Flood Risk Assessment and modelling says not I question why you're reached for one appeal decision in St Ives to support your approach rather than the multiple permissions granted consideration of these very issues by both Inspectors and HDC officers for the immediately adjoining bungalows at Davy Mews, as shown on the CA Analysis extract below, together with other recent developments nearby.



- In each of those instances of recent nearby permissions for bungalows, the Environment Agency raised no objections once they had been able to consider site & scheme-specific Flood Risk Assessments, modelling and confirmation of actual site levels rather than those simply assumed by the large-scale mapping upon which you seem to be relying. I again note that

- the Environment Agency have not raised any concerns in respect of the application or the proposals within.
- In seemingly discounting the submitted **Sequential Test** you requested be prepared for failing to consider each and every possible parcel of land throughout the entirety of the District (despite the very clear special circumstances of the applicant making location with **family support** a paramount concern) you ignore that the LPA does not keep records of potential development sites for single infill plots. As you will be aware, the LPA's current Local Plan sets out within the **Development Strategy** that around 25% of new homes to come forward throughout the lifespan of the plan will be on unallocated 'windfall' sites such as this one.....and where consideration of notional flood risk needs to be balanced against both site / scheme-specific assessment and whether **“the location specific benefits of the scheme outweigh the impacts of flood risk to the site”** as it is suggested is very much the case in this application. It is also a simple matter of fact that as you note (para 7.11) there is flexibility in the scope of an area to be considered, but you have chosen not to take that approach despite being well-aware of the circumstances in this instance.
 - Another anomaly in the report is that it refers the (private) right of access across the site would be retained (as shown on the submitted plans) and no objections have been raised by either the Local Highways Authority or County Council Rights of Way team and sets out that any such private right of access is outside the scope of the planning system (para 7.102) and yet then go on to reference it as part of a suggested reason for refusal. In the interests of clarity, the 'right of way' is neither a public right of way (i.e. not recorded on the Definitive Map) nor is recorded as a 'charge' against the Land Registry Title for the site; instead what we have is more akin to the reliance on third-party folk memory than any actual material consideration.
 - In consideration of the design and detailing of the proposed bungalow, it has been carefully crafted to work on an awkward shaped plot but still allow for 75% of the plot to be available for landscaping and access. The bungalow works with **National Space Standards** at 120m² and will be designed to accord with **Accessible Homes** and **Building Regulations** to ensure full accessibility throughout. The circulation space has been reduced to a minimum whilst ensuring the privacy between the key uses (bedrooms separate from entertaining spaces) by separating them into two wings.

- The house is contemporary in nature but uses traditional roof forms and materiality to ensure no negative impact on adjacent neighbours and sits comfortably within the residential area. The height is well below the adjacent buildings around the site, but still creates a contemporary style that reflects the roof of 49 St Neots Road. The plot is set far back from the street meaning it will not impact the conservation area, the listed building (80m away and not visible to this plot), or the streetscene because from St Neots Road you will barely notice it is there; a similar impact to the immediately adjoining new bungalows also recently granted permission and built following granting of individual planning permissions by the LPA. By way of highlighting several incorrect assumptions / statements, the hedgerow will stay as part of the scheme for privacy for the dwelling (para 7.64), is the same height if not taller (para 7.65) there is a distance to all houses that is significant and will mean it is neither overbearing nor would create an adverse impact on the amenities of any neighbouring property (para 7.80).
- As can be seen from both the formal plans and the attached CA Analysis, the proposed bungalow would sit comfortably at the site and with neighbouring properties together with the character and appearance of the wider area and heritage assets within.

In essence, the proposals would allow for a sympathetically and well-designed and much-needed form of specialist housing with a layout and density of development that will actively enhance the character and appearance of the area whilst making an appropriate use of the site. The proposals would not require the loss of any site features of note and would contribute positively to the street scene and the general character and appearance of the wider locality.

As such I am happy that any valid concerns have been addressed and there is plenty of scope for you to agree with the Town Council and approve the scheme to allow this much-needed and well-designed property to be built.

Please do not hesitate to contact me should you wish to discuss any aspects of the proposals or should you feel you require any additional details, and I look forward to discussing this letter and the application with you at your earliest convenience.

Yours sincerely



Simon Richardson
GamPlan Associates

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