

DEVELOPMENT MANAGEMENT COMMITTEE 17th February 2025

Case No: 24/01827/HDC & 24/01828/LBC

Proposal: (i) Internal and External alterations and Change of Use of Hotel (Class C2) to 2no. Commercial Units (Class E) and 5no. Residential units (Class C3); (ii) Internal and External Alterations and Change of Use of Boathouse (Class C2) to 2no. Residential Units (Class C3); (iii) Partial demolition of Northwest and Southwest Wings and associated works; (iv) Erection of new wings comprising 7no. residential units (Class C3); (v) associated landscaping, ancillary and engineering works and internal and external alterations

Location: Hotel, 10 - 14 Market Square, St Neots, PE19 2AW

Applicant: Whitfield Property Investment Ltd & Huntingdonshire District Council

Grid Ref: (E) 518161 (N) 260197

Date of Registration: 21/10/2024

Parish: St Neots

RECOMMENDATION –

Powers be delegated to the Head of Planning, Infrastructure and Public Protection to:

APPROVE subject to completion of a planning obligation and conditions, and subject to resolution of matters of ecology and biodiversity, resolution of flood risk matters, and subject to carrying out any appropriate referrals and/or advertisements necessary in accordance with relevant legislation.

OR

REFUSE in the event that the planning 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, or in the event that matters of ecology and biodiversity, flood risk cannot be satisfactorily resolved.

These applications are referred to the Development Management Committee (DMC) because the application has been submitted jointly with Huntingdonshire District Council, who have an interest in the site.

1. DESCRIPTION OF SITE AND APPLICATION

- 1.1 The application site comprises approximately 0.11 hectares, located within the centre of St Neots, one of the largest market towns in the district and forming part of the St Neots Spatial Planning Area, identified as one of the most sustainable areas of the district. The site is also situated within the defined Town Centre and Primary Shopping Area, as well as the St Neots Conservation Area and Great Ouse Valley Green Infrastructure Priority Area. There is a substantial number of listed buildings within the vicinity of the site, including approximately 23no. Listed buildings fronting the Market Square directly.
- 1.2 The site itself comprises a Grade II Listed building, the Old Falcon hotel, a 3-storey 15th Century Inn located on the corner of the Market Square and River Terrace. The property has 2no. projecting wings to the rear and a curtilage listed Boat House that sits along the river to the west. The property has historically been in use as a hotel and ground floor pub, with a single dwelling at first floor, though is understood to have been vacant for the better part of 20 years.
- 1.3 The site borders the river Great Ouse along its western boundary, and the edge of the development site lies within Flood Zones 3a and 3b, identified as functional flood plain. To the north, within the grounds of no. 8 Markey Square, is a Yew tree subject to a Tree Preservation Order. A bat survey has revealed the presence of a roosting bat within the building itself.
- 1.4 The application proposes the demolition of significant proportions of the rear wings and the redevelopment and conversion of the former hotel and boathouse to comprise a total of 14no. residential units (including 1no. existing unit) and 2no. commercial units in Use Class E. The rear wings are proposed to be demolished and replaced with stepped extensions in similar positions that will facilitate residential use. This scheme is part of a regeneration programme for the centre of St. Neots with the aim to bring a prominent building in the town centre back into viable use.

2. NATIONAL GUIDANCE AND POLICY AND RELEVANT LEGISLATION

- 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;
 - achieving well-designed places;
 - conserving and enhancing the natural environment;
 - conserving and enhancing the 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. LOCAL 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
 - 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
 - LP24 Affordable Housing Provision
 - LP25 Housing Mix
 - LP30 Biodiversity and Geodiversity
 - LP31 Trees, Woodland, Hedges and Hedgerows
 - LP34 Heritage Assets and their Settings
 - LP36 Air Quality
 - LP37 Ground Contamination and Groundwater Pollution
- 3.2 St Neots Neighbourhood Plan
- Policy A1
 - Policy A3
 - Policy PT1
 - Policy PT2
 - Policy P1
 - Policy P3
 - Policy P4
 - Policy RD1
 - Policy RD2
 - Policy SS1
 - Policy SS2
- 3.3 Supplementary Planning Documents (SPD)
- Huntingdonshire Landscape and Townscape Assessment – Adopted 2022
 - Huntingdonshire Design Guide – Adopted 2017
 - Cambridgeshire Flood and Water SPD – Adopted 2017
 - RECAP Waste Management Design Guide (CCC SPD) – Adopted 2012
 - Developer Contributions – Adopted 2011 (Costs updated annually)

- 3.4 For full details visit the Council's website [Local policies](#).

4. PLANNING HISTORY

- 4.1 16/01628/FUL – Part demolition of buildings. Extensions, alterations and change of use to form shops (Class A1), Restaurants and cafés (Class A3) on the ground floor and 14 residential units on the first and 2nd floors. Refused 23/12/2016. Appeal Dismissed 15/02/2018.
- 4.2 16/01629/LBC – Part demolition of buildings. Internal alterations and extensions to form shops (Class A1), Restaurants and cafés (Class A3) on the ground floor and 14 residential units on the first and 2nd floors. Refused 23/12/2016. Appeal Dismissed 15/02/2018.

5. CONSULTATIONS

- 5.1 St Neots Town Council (copy attached) – Support. Members are pleased to see the building being returned to use; however, there is some disappointment that a hotel could not be incorporated in the proposed plans.
- 5.2 HDC Environmental Health – No objections in principle. It is recommended that the recommendations of the noise report are conditioned to ensure compliance. A condition is recommended requiring a detail ground contamination investigation.
- 5.3 HDC Affordable Housing Officer – No objections. As the viability report makes clear, given the complexity and cost of repair and conversion of the Listed building it is unrealistic to expect delivery of affordable housing.
- 5.4 HDC Ecology Officer – No objection subject to conditions requiring the recommendations of the submitted report to be carried out.
- 5.5 HDC Landscape Officer – No objection to the proposed development subject to a condition requiring detailed planting proposals.
- 5.6 HDC Arboricultural Officer – No objections subject to a condition requiring the tree protection measures within the arboricultural report to be carried out.
- 5.7 HDC Urban Design – No objection in principle subject to conditions in respect of material and architectural details, and boundary treatments. Concerns are raised in respect of the fibre cement cladding and whether it will retain an appropriate appearance as it weathers. Alternative materials could be agreed by condition if necessary.
- 5.8 HDC Conservation Officer – The proposed development will cause less than substantial harm to the significance of the Listed Building, and the works are substantial and will result in the loss of historic fabric. The building has been vacant for 20 + years and some of the fabric is beyond conservation, some structural failure of the timber frame is now occurring, and intervention is required to save the building from further collapse. The bringing back of this building to a restored occupied condition will also necessitate some harm through the proposed

alterations and the upgrading of fabric to meet modern standards, however the public benefit of returning this building to a positive use must also be taken into consideration.

The consideration of heritage harm and public benefit is a matter for the planning officer as part of a balancing exercise and is matter for the decision maker. A number of conditions are recommended in the event of an approval.

The development will result in no harm to the Conservation Area and will enhance and restore the appearance of the wider site.

- 5.9 The Georgian Group – Whilst the moves to repair and reuse the listed building is important, there are reservations over certain aspects of the proposed scheme. While there is no objection in principle to the demolition of the north and south ranges, the proposed designs of the river frontage elevations are assertive, and will detract from the setting of the listed Boat House, particularly the southern range as it projects closer to the river and has a stronger visual relationship with the Boat House. It is recommended that the design of this is simplified to allow the Boat House to remain the dominant structure. The historic panelling reused in the 20th C extension to the southern range should be retained and reused elsewhere within the complex. The alterations to the first floor southern range are extensive and involve the loss of many internal partitions. Details on the age and significance of these is limited and more detail is sought on the age and significance to understand the impact.

There is no objection to the conversion of the Boat House, but the alterations to the river frontage are considered harmful to its significance, and it is recommended the option of converting this into one unit is explored. The replacement of the Boat House's historic window joinery has not been sufficiently justified. It is important to reserve as much of the surviving historic fabric as possible as it is historically significant fabric and difficult to replicate using modern materials, to the detriment of the significance of the building. Adequate justification will need to be provided to make an assessment of the loss of historic fabric.

- 5.10 Society for the Protection of Ancient Buildings – While the reuse of the building and conservation of historic fabric are welcomed there is generally an insufficient level of detail provided throughout the application and concerns with the proposal as it currently stands that warrant an objection at this stage. The heritage statement has provided details of the overall works, but there are some areas where significant amounts of demolition are proposed with little justification or detail on the age and significance of historic fabric.

The loss of the surviving timber elements within the north and south wings are considered to be significantly more harmful to the significance of the heritage asset than described in the Heritage Statement and the loss of the partitioning is not considered sufficiently justified. No justification has been provided for the new openings within the historic fabric of the southern range, or to justify the use of the industrial louvred doors.

The use of a Juliet balcony is a modern intervention that would result in the elevation appearing incoherent and is insensitive to the historic character of the asset. Detailed drawings of the balconies within the courtyard and fixed to the historic main range are required.

- 5.11 Historic England – No comments.

- 5.12 Anglian Water – No objections. There is capacity within the network to accommodate the foul flows from this development. It is noted there are Anglian Water assets in the site that may be affected, and the developer should contact Anglian Water.
- 5.13 Environment Agency – Object due to an element of the proposal being located within the flood zone 3b; additional information sought in relation to site specific flood risk assessment. *(Officer Note; Ongoing discussions are underway with the Environment Agency and applicant to understand the detailed technical impacts and information sought. As noted below and within the recommendation, it is recommended that the resolution of this matter is delegated to officers.)*

6. REPRESENTATIONS

- 6.1 3no. neighbour representations received (3no. neutral representations,), across both applications, raising the following summarised material points;
- Support the need for the development at speed
 - The existing dilapidated site is currently harmful to the character of the area.
 - Concerns regarding the lack of car parking available and potential displacement of parking to surrounding, congested areas.
 - The parking space shown within the site is on a very narrow, tight and blind bend and would be dangerous for regular users.
 - Concerns regarding potential anti-social behaviour.
- 6.2 Campaign for Real Ale (CAMRA) – Broadly support the application but consider one of the commercial units should have the opportunity to be a restaurant and bar to preserve the previous use of the building, preferably Commercial Unit 2 which represents the best-preserved historic interior and was the part of the building previously used as a pub.

7. ASSESSMENT

- 7.1 The main issues to consider in the determination of this application are:
- Principle of Development
 - Design and Character of Built Form
 - Housing Mix
 - Transport Impacts and Highway Safety
 - Ecology and Biodiversity
 - Drainage and Flood Risk
 - Heritage Impacts
 - Impacts to Neighbouring Amenity
 - Land Contamination and Air Quality
 - Amenity and Health of Future Occupants
 - Other Matters
 - Contributions
- 7.2 The starting point for proposals, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 is that developments shall be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

- 7.3 This section relates to the principle of development as it relates to the location within the built-up area. Other matters of principle, including flood risk, are considered in their relevant sections below.
- 7.4 The application site is located within the Built-Up Area and Town Centre of St Neots, identified as a Spatial Planning Area under policy LP7. Within the Built-Up area, development proposals are generally considered to be sustainably located, and it falls to more detailed considerations as to whether they are acceptable.
- 7.5 The application site is within the Town Centre and Primary Shopping Area, policy LP21 seeks to retain the location as a key focus for local communities, promoting specific uses in order to maintain the viability and vitality of the town centre. The application proposes 2no. commercial units, within Use Class E, at the ground floor of the main building to east, fronting onto the Market Square. Within the rear wings the application proposes residential units at ground floor level, accessed from within the internal courtyard. It is noted that, while these units are at ground floor and within the Primary Shopping area, access would be limited, and they are visually separated from other shops in the surroundings such that it would be considered highly unlikely they could attract footfall necessary to support a viable commercial use. As such, it is considered the proposed use of the 2no. units along the Market Square frontage is appropriate and sufficient to accord with the requirements of the policy LP21.
- 7.6 It is noted that CAMRA have supported the proposed uses subject to one of the commercial units becoming a bar or restaurant. While Use Class E includes provision for these types of uses amongst others, it is not development to move within a single Use Class and therefore falls outside planning controls. In any event, while there is likely to be some limitations created by virtue of the size of the units, it would also be inappropriate to express only a single form of use and may be detrimental to the success of these commercial units.
- 7.7 Officers note policy P3 of the Neighbourhood Plan indicates support for the redevelopment of the Old Falcon subject to uses that enhance access to the river frontage, particularly for food and drink and leisure and recreation. This application does not propose such uses along the river frontage, and it is not envisaged that this would be achievable. There is considered to be an inappropriate clash between such uses and future occupants with any such access through the internal courtyard of the development site, and while consideration was given to promoting a cafe to the river end of the southern wing, Anglian Water assets meant that any such use would not be able to achieve a reasonable level of identification to attract any potential users, and it appears unlikely that any supporting infrastructure, such as hardstanding, would be possible to site along that southern area given those assets. As such, and noting that this has not been found to be a feasible type of development, it is not considered that this represents a policy conflict in terms of use, given the stance of the adopted Huntingdonshire Local Plan as the later policy document, and in the context of policies RD1 and RD2 of the Neighbourhood Plan indicating support for economic development proposals through reuse of brownfield land, albeit the policy itself requires compliance with other policies.

- 7.8 On the whole, therefore, and subject to other material considerations, the principle of the development is considered acceptable, and in accordance with policies LP7, LP21, RD1, RD2 and SS1 in terms of use, location within the built-up area and the amount of development.

Design and Character of Built Form

- 7.9 The proposed development largely replicates the existing arrangement of built form, replicating the U-shaped form of the existing onsite buildings with extensions towards the west, and closer to the river, to northern and southern ranges. The proposed extensions to the rear utilise a more modern design, with a generally simple overall form and a stepped approach towards the river.
- 7.10 The application has been reviewed by the Urban Design Officer who has generally supported the proposal but has queried the proposed fibre cement cladding as a potentially inappropriate material within the locality. They have recommended a number of conditions, namely in respect of material specifications and architectural details.
- 7.11 In terms of the layout, the proposed development replicates much of the existing arrangement, and retains the primary building to the front as the main focus of the site, reflecting a subservient nature of the ranges as appropriate to the historic core of the town. The layout would provide a clear demarcation between the more private internal courtyard and the semi-public open space to the southwest corner and would retain views through to the river from the Market Square.
- 7.12 It is proposed that there would be shared bin and cycle store within the southern range, appropriately sized to reflect the number of bedrooms within the development. It is noted that comments have been received from the National Amenity Societies that the proliferation of doors, windows and balconies to serve these uses create an incoherent elevation. While officers note that these would be a reasonably prominent element along River Terrace, that view does not provide a significantly public viewpoint given use of the road appears somewhat limited to the occupants of the properties it serves. The design of these features would serve to highlight their use as subservient elements that provide service access to the wider development, and officers consider there appear to be limited alternative options that would provide the necessary level of access for all future occupants. As such, it is considered that, while the service access points are reasonably prominent, they are not significantly harmful in design terms, and it is an appropriate position to enable suitable access for occupants of the development.
- 7.13 The application proposes soft landscaping predominantly within the southwest corner as part of the semi-public space serving future occupants, with some threshold planting in the internal courtyard that would support defensible access space. The Landscape Officer has raised no objections to the proposed landscaping but has recommended a condition requiring a detailed planting schedule, which would ensure planted species would be appropriately located to promote their success and longevity within a constrained site.

- 7.14 Subject to conditions, therefore, the proposal is considered to accord with policies LP11, LP12, A1 and A3 in terms of design and landscape character.

Heritage Impacts

- 7.15 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that special regard is had to the desirability of preserving particular features of Listed Buildings and Conservation Areas and great weight should be afforded to the assets conservation. The Ancient Monuments and Archaeological Areas Act 1979 protects the archaeological heritage of Great Britain by making provision for the investigation, preservation and recording of matters of archaeological or historical interest.
- 7.16 Policy LP34 requires that great weight is afforded to the conservation of heritage assets, and that any work will require clear justification alongside appropriately detailed assessments of the heritage significance of the asset and how the proposal will make a contribution towards, or better reveals, the significance of the affected asset.
- 7.17 Policy SS2 of the St Neots Neighbourhood Plan supports the re-use of historic building within the Town Centre for town centre uses. Any alterations will need to be sympathetic to the historic and architectural significance of the character of the building.
- 7.18 The application site comprises a Grade II Listed Building located within the Conservation Area, with a curtilage listed Boat House to the rear of the property along the river. The building forms part of a group of Listed Buildings along the western edge of the Market Square, together with nos. 6 and 8, also Grade II. To the south of the site is a range of 13 no. Grade II Listed Buildings that comprise the southern edge of Market Square, and to the north is 9no. Grade II Listed Buildings that form a large section of the northern edge, along the road. A Grade II Listed Memorial is situated centrally within the Market Square to east of the site, with a single Grade II Listed Building, nos. 50 & 52 along the eastern edge of Market Square.
- 7.19 The Old Falcon itself is a substantial 3 storey building over a basement, located in the southwest corner of Market Square and dating from the C15, with a range of alterations and extensions, including refronting the primary elevation to reflect the prevalent architectural style and approach at the time. The building was historically a coaching house, used to support the commercial trade important to the historic function of the town. The extensions to the rear, dating to the C17 are of a generally simpler architecture than the front range, and incorporate large areas of painted render.
- 7.20 Internally, there are examples of much of the timber framing that provide evidence of the historic architecture and support the legibility of how the building has changed in form and detailing over time. There also remains evidence of C18 and C19 fireplaces and surrounds and staircase treads and risers, with C20 panelling in a later addition likely reclaimed from elsewhere. There has been a significant level of work undertaken to the internal fixtures and fabric, and the application indicates there is little or historic interest that remains beyond the identified items.

- 7.21 The curtilage listed Boat House to western edge of the site is a simple, C19 building with a traditional dual-pitch and gable roof constructed in painted brickwork. It is arranged over two floors with simple elevations, and with an undercroft that provides boat access to the river. Internally there have been a number of alterations, but notable surviving historic fabric includes floorboards, picture rails, coving and skirting boards, as well as a C19 fireplace, though with a missing grate and some infill in the surround with modern tile.
- 7.22 In its own right the building provides a significant contribution to the historic core of the Market Square and is highly prominent given the position as part of the shorter length of built form on the western edge. The current state of disrepair, including the coverings over the fenestration, are harmful to the significance of, and limit the overall contribution to, the Conservation Area as a heritage asset, and to the setting of the listed buildings in the surrounding area. The works to bring the building back into use would improve the relationship with the Conservation Area and within the setting of the surrounding Listed Buildings.
- 7.23 The submitted details have been accompanied by a substantial amount of information, including a heritage statement setting out the significance and works to the proposal, reports detailing investigations in to rot within the fabric of the building and its structural stability. These have been reviewed by the Conservation Officer, who has raised no objections in principle, noting that significant levels of intervention are needed to save the building, and recommending a number of conditions.
- 7.24 The Georgian Group (GG) have raised objections on the basis of insufficient justification for some of the works being proposed, and some of the proposed works to facilitate conversion. While they have raised no objection the principle of demolishing the north and south ranges, or their reconstruction, they have raised concern with the extension closer to the river and the detailing of the ends of the replacement wings. They consider this would result in a conflict with the river elevation and detract from the prominence of the boat house as the principle historic feature. They have recommended the boathouse is converted to a single unit, as the works to the river frontage would detract from the simple elevation of that building. GG have also objected on the basis of lack of information to some of the works, including replacement fenestration and the reuse of some of the historic fabric elsewhere.
- 7.25 The Society for the Protection of Ancient Building (SPAB) have also raised objections on the basis of insufficient justification for the loss of the significant level of historic fabric, particularly to internal partitions within the retained south wing. They have raised objections to the creation of new openings within the south elevation that provide access to the bin store and create fenestration. SPAB have raised concerns with modern elements, including the Juliet balcony and the use of louvred doors within the historic range, considering this creates an incoherent historic elevation.
- 7.26 In terms of the demolition of south, and part of the north, rear ranges, these are generally identified as having been subject to significant alteration, with works largely removing any particular historic interest, particularly in the southern range. It is noted that there are no objections to the principle of removing these elements, and given the condition of

these elements it is considered highly unlikely that they could be converted. Given the minimal historic value, the demolition of part of these rear ranges is considered acceptable.

- 7.27 In respect to the works to the main front range, externally these generally comprise repair and maintenance works, but also include structural works necessary to support the rear of the cart access and the southern gable, both of which are structurally unsound. Works internally will largely seek to retain the historic plan form of the building as part of the conversion, being within existing doorways and hallways. This will minimise the level of intervention necessary to the internal walls, and is considered an appropriate approach to retain the historic layout of the historic core of the building. While historic fabric is largely proposed to be retained, it is intended to provide floating floors and acoustic lining to the walls, to provide sufficient fire and environmental performance within the building. While these will cover the historic fabric it is noted that these are necessary to ensure long-term safety within the building and to provide an acceptable living environment, and noting the historic fabric is retained these are not considered to be interventions that would materially harm the significance of the building.
- 7.28 The structural works to the coaching arch will generally comprise the removal of rotten timber and splicing in sound timber where possible. Given the identified rot within timbers this is considered a reasonable intervention in the historic fabric to ensure retention of this significant structural element. Similarly, the gable end in the south wing is also currently subject to a partial structural collapse. Urgent work is needed to retain this element, and while it is noted that the submitted details do not include specific proposals, and notes this will need to be investigated further following the demolition of the adjoining southern range. The Conservation Officer has recommended this is dealt with by condition, and it is considered this is appropriate in this instance given the urgency of the work.
- 7.29 The works to the boathouse to create the subdivision into 2no. units are largely limited to necessary works in creating and removing internal partition walls. Officers note the interventions internally will alter the historic plan form, and GG have raised concerns that the subdivision into 2no. units would require an inappropriate level of intervention into the building to the detriment of the simple design. While these comments are noted, discussions with the applicant at pre-application stage explored the potential for a single unit but were not considered appropriate given the nature of the site and the associated need for supporting facilities such as garden land and parking that were considered necessary for a larger unit likely to be serving more occupants. As such, while Officers consider there would be some greater level of harm to the simple design of the unit through the subdivision into 2no. units over 1no. unit, it is considered that this would be outweighed by feasibility issues associated with a larger unit, and the need to provide appropriate private amenity space to each individual unit to provide an acceptable standard of amenity.
- 7.30 In respect to the proposed modern extensions to create new residential units, these generally follow the historic pattern of the rear ranges and steps down towards the river. They have adopted a simple design and form, and the arrangement of fenestration, utilises an architectural approach more reflective of outbuildings, reflecting the style of

supporting ranges to the main building. It is noted these extend closer to the river, and concerns have been raised that they would compete along that frontage with the boathouse through overly complex gable ends and the increased proximity to the river frontage. Officers note these concerns, and that the gable ends of the proposed new ranges would appear modern and much closer to the river such that they may give to some level of competition with the boathouse. That said, the use of modern materials and designs would serve to demonstrate the progression of built form over time and demarcate between the different elements such that, read as a whole, the boathouse would remain a clearly historic building read in the context of the river scene, with the modern gables, at a lower overall height, serving to 'bookend' the boathouse.

- 7.31 In respect of the proposed modern ranges to the north and south that replace the demolished ranges, these largely reflect the established historic pattern of built form within the site. It is noted that historic maps show development much close to the river edge, and the extensions of the depth of these ranges would reflect some of that historic form. The stepped approach close to the river would similarly reflect the subservient nature of the ranges to the main host building to east. While it is noted there is a range of styles and a reasonably large number of windows and doors serving each unit, there is a regularity to the approach to fenestration and the aesthetic is reflective of the more informal approach to the historic ranges given their uses.
- 7.32 The application has been accompanied by a viability assessment, together with the supporting details in the heritage statement, structural reports and reports into rot and failure within the fabric of the building. Together these demonstrate a significant heritage deficit within the site and the listed building. The removal of a substantial amount of the fabric is therefore proposed in the context of seeking to save the historic core of the building that fronts the Market Square, but supporting development is necessary to enable investment to make the overall works viable, and to facilitate bringing the building back into a long-term use to ensure its longevity and continued maintenance.
- 7.33 In considering the impact of any proposal on the significance of a designated heritage asset, great weight should be afforded to the asset's conservation. Para. 221 of the NPPF is clear that Local Planning Authorities should assess whether the benefits of a proposal for enabling development, that would otherwise conflict with planning policy but would secure the future of the heritage asset, outweigh the disbenefits of departing from adopted policy.
- 7.34 On the whole, and having considered all representations, Officers consider there is a level of less than substantial harm to the heritage asset arising from the works, both in respect of the demolition and the removal of historic fabric, as well as some of the design arrangements proposed to convert the buildings. That said, the significant level of decay, failure of some of the elements of the building and works over the years is considered to mean that the level of harm is towards the medium-low end of the scale.
- 7.35 Notwithstanding, works to the building are necessary at this stage to prevent its failure and secure the longevity of the front range as the core historic element of the building and that is considered to provide the

greatest contribution to the setting of surrounding heritage assets due to the relationship with the Market Square. While officers consider some of the works on their own have been accompanied by lighter justification than might otherwise be sought, given the significant level of fabric failure, the demonstrated rot, and the structural issues, it is considered that the details submitted are still sufficient to justify the level of works proposed taken as a whole.

- 7.36 A number of conditions have been recommended by the Conservation Officer. These predominantly relate to methods of carrying out work within the development and further information as elements are revealed. In respect of those conditions controlling methods of work, particularly around structural supporting, it is considered these would be necessary to control adequate structural support through the course of the works, noting the close proximity of any works within the site. A number of conditions have been recommended that seek further details on works to be agreed once more invasive investigations have been carried out. These 'opening up' conditions are considered an appropriate way to ensure that repair work is carried out to a suitable standard and in appropriate materials that support the fabric of the building, while noting that it would not be possible until the investigations have been carried out to identify the level of work needed.
- 7.37 Notwithstanding further discussion set out below in respect of the planning balance in the context of an 'enabling works' proposal, any such application will need to appropriately secure the works to be carried out to the listed building. Failure to secure the works would undermine the basis for any grant of planning permission under NPPF para. 221. Officers have considered the appropriate method to secure works in this instance. As this proposal is contained entirely within the site and the works are substantially integrated in how they will be carried out, being extensions and alterations to the listed building itself, and it does not control financial mitigation or the transfer of money between projects, officers consider that this may be appropriately controlled through a condition in this instance.

Housing Mix and Type

- 7.38 The Cambridgeshire and West Suffolk Housing Needs of Specific Groups (HNSG) 2021 provides guidance on the mix of market housing required for Huntingdonshire up to 2031. This gives broad ranges reflecting the variety of properties within each bedroom category. This indicates a requirement for the following mix of market dwelling: 0-10% 1 bedroom homes, 20-30% 2 bedroom homes, 40-50% 3 bedroom homes and 20-30% 4 or more bedroom homes. The HNSG does not provide a detailed break-down in respect to rental properties, as the size of units is subject to significant fluctuation in market demand in response to other factors (such as government schemes) but notes there is a focus for these in larger urban areas and the policy position should generally be supportive subject to location.
- 7.39 As a full application the detailed breakdown of proposed unit sizes is available, being 50% 1-bed and 50% 2-bed units. As the proposal is within one of the largest market towns within the District, it is considered an appropriate location for a rental type scheme. While there is a limited range in unit sizes, given the actual scale of the scheme at 14no. dwellings, it is considered that the proposal would still provide a

reasonable contribution to meeting the need for rental units and would not be at such a scale that it would undermine any wider development's ability to deliver a healthy mix and balance of unit sizes. The proposal is therefore considered to accord with policy LP25 in respect to housing mix.

- 7.40 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' unless it is unviable or impracticable to do so. 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. 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.
- 7.41 The application is in full form, and as such it can be considered against the requirements of M4(2). It is noted that, while there are number of requirements that are met, several would not be possible due to the constrained nature of some of the building, in order to retain historic fabric, and noting the viability position set out later in this report. As such, while the proposed development has demonstrated insofar as possible elements of appropriate accessibility, it is not considered that it would be feasible in this instance to require accordance with M4(2) as there are site-specific factors that make this unviable.
- 7.42 On the whole, therefore, the proposal is considered to accord with policy LP25.

Transport Impacts and Highway Safety

- 7.43 It is noted that the historic use as a hotel and pub remains extant and as it currently stands does not have any associated car parking. Given the length of time since those uses were in place, and the lack of information available on the potential intensity of those uses that could be accommodated in the building as it stands today, officers have considered the potential impacts on their own merits. That said, it is noted the fallback position has the potential to give rise to a level of vehicle movements that would be materially impactful, particular from occupants of the hotel and more varied forms of movements.
- 7.44 This application proposes that units would be occupied on a car-free basis, and there is no parking available within the development, with the exception of a maintenance bay that would be used intermittently by maintenance personnel and controlled through a locked bollard to prevent unauthorised parking. That single space, in light of the infrequent use, is not considered to materially impact the highway network in terms of capacity or safe functioning through vehicle movement.
- 7.45 Noting the highly sustainable location, officers consider this a reasonable proposal, and that future occupants would not be prejudiced through the limitations on private cars. Officers also note that the lack of parking on the site would mean that highway safety arising from vehicle

movements from the site would not be materially different than the existing arrangement.

- 7.46 All that said, there is potential that future occupants might choose to own a car. There is some, but very limited, parking in surrounding areas, but none particularly close to the site, noting parking restrictions on surrounding roads. That said, future occupants would be aware of the limited available parking, and the nature of the development, being smaller units located within such a sustainable location, is considered to support occupation without requiring private car. In addition, the proposed development should be considered in the context of the extant hotel use, the development is considered likely result in a lower level of traffic generated from the site.
- 7.47 The application makes provision for cycle storage, which Urban Design have considered is sufficiently sized to be able to accommodate likely population from the development and promote alternative modes of travel to private car. It is considered appropriate to condition the cycle storage to be retained in perpetuity, so as to ensure this is maintained to a level that is useable for future occupants.
- 7.48 On the whole, and subject to the condition identified, it is considered the proposed development would not materially impact safe functioning of the highway network and would support alternative modes of transport to the private car, in accordance with policies LP16, LP17, PT1 and PT2.

Ecology and Biodiversity

- 7.49 The Arboricultural Officer has reviewed the submitted application and is generally supportive, subject to a condition requiring the protection measures within the Arboricultural Impact Assessment to be carried out in order to protect the trees on and adjacent to the site. Officers note the works to trees indicated and the method statement as to how trees that are to be retained will be carried out. It is noted that most of the trees onsite appear to be self-seeded, and are category C. Their felling is necessary to enable the development to proceed, and they are not considered to be of such value in their own right that they would warrant retention. As such, officers consider the proposed felling of the trees would be acceptable, and that the trees to be retained could be appropriately protected through condition.
- 7.50 The application has been accompanied by an ecological investigation and subsequent surveys that have identified the presence of bats within the building, together with calculations of the current level of biodiversity within the site. These have been reviewed by the Ecology Officer who has raised no objections in principle subject to conditions requiring the recommendations of the submitted reports to be carried out.
- 7.51 In terms of habitat within the site, the proposal would close existing gaps in the fabric of the building and would remove the existing bat roost. This would be a licensable activity and so would be controlled through Natural England, including appropriate relocation. Noting the licence process, that falls under other legislation, it is considered appropriate to condition the submission of a copy of the licence, but there are other legislative controls in place to ensure the development is carried out in a manner that would not materially harm protected species.

- 7.52 The application site is required to deliver a net gain in biodiversity units of 10% in accordance with the Environment Act 2021 and subsequent regulations. The application has been accompanied by a suitable metric that has sufficiently identified the current baselines in the site and notes the proposal would result in a loss of 0.59 habitat units (approximately 85% of existing at 0.7 units). It is noted that the actual unit provision on site is small, and so any change provisions result in a correspondingly large percentage.
- 7.53 In order to accord with the statutory requirements an offsite provision will be needed in this instance due to site constraints. Discussions with HDC's Biodiversity for All Team have indicated in-principle support for delivery of these units within Riverside Park to the west of the application site on the opposite side of the river. In accordance with BNG Guidance the final details of the BNG will be secured after any permission is issued and officers consider there is no reason to conclude anything other than that it will be possible to secure sufficient net gain to meet the statutory requirements.
- 7.54 It is noted that, in requiring offsite biodiversity net gain, it is usual that a legal agreement would be entered into. In this instance HDC is one of the applicants for the application, and the likely landowner for the intended recipient land in Riversfield Park. It is not appropriate for the District Council to enter into a legal agreement with itself, and while there would be further parties that such agreements would be enforceable by, it is unclear on their appropriateness in the context of HDC as recipient landowner. Consideration is therefore being given to the appropriate method to secure Biodiversity Net Gain, and whether this is a matter that might fall under condition, is already covered by the requirements of the legislation, or would require a legal agreement.
- 7.55 All that said, officers consider the proposal would accord with the requirements of the regulations and policies LP30 and LP31, subject to appropriate controls through condition or otherwise. Delegated powers are sought to enable officers to finalise the detailed arrangements as to how to secure Biodiversity Net Gain, noting that it is not possible at this stage to confirm the most appropriate method as the specific location is unknown.

Drainage and Flood Risk

- 7.56 While the application site is predominantly located within Flood Zone 1, at lowest risk of flooding, the western edge, adjacent to the river, is located within Flood Zones 3a and 3b, which in this instance are concurrent. This is regarded as functional floodplain and at the highest risk of flooding from river sources, and generally appears to extend from the western edge to approximately 8m into the site.
- 7.57 The Environment Agency (EA) have raised an objection in principle to the proposed development, noting the position of residential development within the functional floodplain. At the time of drafting this report the EA are reviewing the technical acceptance of the Flood Risk Assessment submitted with this application, and whether the proposed development in its own right is demonstrably safe from flooding and does not increase flood risk elsewhere, no conclusions on that have yet been provided and it has been identified that part of the site lies within Flood Zone 3b and is therefore at highest risk of flooding from river

sources. In accordance with NPPF paras. 173 to 175 such applications should be accompanied by a sequential test that demonstrates there are no reasonably available alternative sites at lower risk of flooding. In this instance the application has not been accompanied by a sequential test, and the applicant's planning statement reinforces the proposed development is intended to secure the long-term preservation of the heritage asset. At the time of writing this report Officers continue to work with the applicant to address the requirements of the NPPF, when taken as a whole, including the Sequential Test.

- 7.58 In respect of the Sequential Test itself, it is noted that residential developments within the district would normally require a district wide approach but, in accordance with the NPPG and the adopted Flood and Water SPD, site specific factors and local circumstances will be considered in defining search parameters. In particular to this case, and in the context of the proposal as an 'enabling development' application that would represent an exception to policy in its own right, the reasonable availability of land and the timescale in which development would be needed to generate sufficient capital to facilitate the safeguarding of the heritage asset are limiting factors. While further consideration will be given to the Sequential Test in consultation with the relevant bodies, and as part of the overall consideration of matters of flood risk, these matters are highlighted at this stage to provide understanding of the factors that will inform part of that assessment, and including whether the application of the Sequential Test is necessary in this instance, in the context as an 'enabling development', and balancing that against the material benefits of the proposal.
- 7.59 It is noted that, in terms of conflict with Flood Zone policy, only units 3 and 14 would be in conflict, as the conversion of the boathouse would be exempt in accordance with NPPF footnote 62 as a material change of use, and all other units are sited in Flood Zone 1. Units 3 and 14 are proposed as extended forms into the flood zone area and so would introduce built form into areas where there is no current built form, albeit unit 3 is narrower than the existing rear range and so would provide some offset. Whilst not the case within Flood Zone 3b, it is acknowledged that across the entirety of the site the developments are comparative in terms of existing and proposed footprint.
- 7.60 Notwithstanding the EA objection, officers note the submission is on the basis of enabling development in accordance with NPPF para. 221, which by definition would otherwise be in conflict with other planning policy. While the exception test under NPPF para. 178 is not normally relevant to proposals within Flood Zone 3b officers have considered the proposal against the requirements of that, namely that the development provides wider sustainability benefits to the community and is safe for its lifetime without increasing flood risk elsewhere.
- 7.61 In respect of wider sustainability benefits, officers note the reuse and long-term safeguarding of the heritage asset amongst other benefits of the regeneration of the site as a whole, and acknowledgement in accordance with NPPF para. 202 that they are an irreplaceable resource that should be conserved appropriately. The conservation and reuse of heritage assets is recognised to provide social and environmental benefits, and this matter is returned to in detail later in this report as part of discussion on the overall planning balance.

- 7.62 In respect of the long-term safety of future occupants and ensuring there is no increase in flood risk elsewhere, the submitted FRA has provided recommendations to protect the dwellings and future occupants during a flood risk event. Namely it proposes that floor levels would be above the modelled flood levels, or demountable protections and resilience measures applied to those refurbished buildings where it is not possible to raise the floor levels. It is noted that, within Flood Zone 3, the new build units would be above the designed flood level, and the 2no. units with accesses in the existing flood zone are proposed to be protected by demountable flood board defences and that would provide safe means of escape during a flood event. Such an arrangement is considered to be a suitable form of protection in principle, given site specific considerations.
- 7.63 It is considered conditions securing the details of a flood warning and evacuation plan would be appropriate in this instance, as officers consider there is a clear evacuation route, and such a condition would enable securing this in the long term for future occupants. On the whole, and subject to further consultee comments, it is therefore considered the proposed development could be capable of being suitably safe for its lifetime, having regard to modelled flood levels and those units located within the Flood Zone.
- 7.64 As identified above, at the time of writing this report, further discussions with, and comments from, the Environment Agency are expected in respect of the technical details contained within the Flood Risk Assessment. As these have not yet been reviewed officers are not in a position to formally conclude the built development would be safe for its lifetime and would not materially increase flood risk elsewhere, and dialogue continues with the applicant and the Environment Agency on these points. While further consideration is being given to the technical impacts and implications of the proposed development, officers consider there is a reasonable stance to be taken in respect of the planning balance. This matter is returned to later in this report.

Impacts to Neighbouring Amenity

- 7.65 There is generally limited change in the physical relationship between the site and surrounding property, with the exception of no. 2 River Terrace to the south. The application proposes an increase in the height and depth of the southern wing that runs closest to this property, including the introduction of windows and balconies, and with the creation of an external amenity area serving the proposed residential units.
- 7.66 The units within the southern wing face towards the side elevation of no. 2, and while there are windows to that side, these do not appear to serve primary habitable rooms or are screened by an existing boundary fence in very close proximity. There is a 6.6m offset between the proposed built form and the neighbouring property, and together with the orientation of the units, having regard to the position of the sun, it is considered the proposed units would not give rise to any material overbearing or overshadowing impacts to neighbouring dwellings.
- 7.67 The proposed fenestration along the south facing side of the southern wing faces towards no.2, and noting the length of that elevation, faces towards both the side elevation and the rear garden area. It is noted that

the majority of the windows are rooflights, and set at least 1.7m above floor level such that they would afford very limited views over neighbouring property at an oblique angle, sufficient to mitigate views over neighbouring property. The provision of the balcony would be likely to afford a greater level of visibility, but this is located closer to the flank elevation such that views of neighbouring garden land would be minimal, and further mitigated by the frosted glass panels that would limit some perception of overlooking. On the whole, officers consider the proposed development would not materially impact the amenity of neighbouring property through overlooking.

- 7.68 The proposed uses within the development would lead to an increase in intensity within the site that is likely to give rise to additional noise when considered against the current situation within the site. It is noted that the historic use as a hotel and pub remains extant and have the potential to be a significant source of noise and activity in their own right. However, given the length of time since those uses were in place, and the lack of information available on the potential intensity of those uses that could be accommodated in the building as it stands today, officers have considered potential noise generation against current circumstances. The majority of noise generated would be typical residential noise, and while the development is at a high density, with a substantial conglomeration of units in a small area, it is not considered likely that the intensity of such use would mean the noise associated with the residential uses would materially impact amenity of surrounding properties through noise generation.
- 7.69 While officers note the 2no. retail units in the frontage also have the potential to give rise to adverse impacts to neighbouring property, including through noise or emissions. The proposal does not make provision for ventilation or extraction systems, but noting the range of uses that fall within Use Class E, officers consider it reasonable to condition that any extraction plant is first agreed in writing. Beyond that control, it is considered the scale of these units would not lend themselves to specific uses that would give rise to materially harmful levels of noise, activity or odour to the detriment of the surrounding area.
- 7.70 It is noted that the development site is reasonably restricted in terms of its location, and the works to retain the heritage asset would limit the land available for contractor parking or materials storage. It is considered appropriate that a condition is imposed requiring a Construction Management Plan, to ensure that this is appropriately managed to ensure safety of the locality during development and mitigate potential amenity impacts to residents from matters such as construction noise, deliveries and dust, amongst others.
- 7.71 On the whole, and subject to the conditions identified, officers consider the proposed development would not materially harm the amenity of surrounding neighbouring property and would therefore accord with policy LP14.

Land Contamination and Air Quality

- 7.72 The application site comprises an historic public house, with a significant number of changes in its overall extent and form throughout the lifetime of the building. Officers note that the application has been accompanied by a desk study investigation in land contamination, which has been

reviewed by the Environmental Health Officer. They have raised no objections subject to a detailed investigation and remediation proposals being secured through condition.

- 7.73 Noting the likely risk, as identified within the submitted report, is moderate to low, officers consider conditioning the detailed investigation is the appropriate route to ensuring safety of future occupants and workers during construction.
- 7.74 Officers note the development site is proposed on a car-free basis, and while located in an area that does experience high traffic movements, it is not in any area identified as being at risk of poor air quality that is harmful to human health. While the development is likely to give rise to some form of particulate matter during the course of construction, it is considered a construction management plan would be sufficient to mitigate for a reasonably short build-out period. The level of any emissions or particulate matter that might arise from the development itself is considered to be negligible such that there are no further controls needed to mitigate for health of future occupants.
- 7.75 Subject to the conditions identified above, it is considered that the proposed development would not result in any material impact to the health of existing or future occupants through ground contamination or inappropriate air quality. The proposal would therefore accord with policies LP36 and LP37.

Amenity and Health of Future Occupants

- 7.76 The application site is located within the Town Centre, and in close proximity to a number of existing commercial units, including a takeaway to the immediate south and a dental surgery in the adjoining unit (no. 8) to the north. To the east is the Market Square, an area of public open space that includes some parking and provides for market stalls. There is a significant level of traffic that uses the surrounding road network, particularly to the north of the site.
- 7.77 The application has been accompanied by a noise report that notes the dominant source of noise is from transport sources, mainly the mixed traffic using the surrounding network as a major access from east to west across the river. Commercial activities were also noted within the surroundings and dominant above road traffic noise, although officers consider some of that noise is likely to be more intermittent and dependant on visitors, with plant and machinery a more constant source.
- 7.78 The submitted noise report makes a number of recommendations as to how a suitable noise environment can be made for future occupants, in accordance with British Standards and World Health Organisation recommendations. The Environmental Health Officer has supported these and recommended they are secured by condition. It is noted that there is an instance where the recommended noise levels would be breached, namely along the eastern boundary, when windows are open. While the daytime breach (at 50db) is notable, officers consider this would be reasonably expected by future occupants, who would be able to make an informed decision about whether they wish to occupy the units that have windows along that boundary. The nighttime noise levels (at 42db) are only 1db higher than an otherwise unacceptable arrangement, and while in breach are not considered to be so materially

significant that it would result in an unacceptable nighttime arrangement for prospective occupants. As such, it is considered the proposed residential units would not be materially impacted through noise sources from existing external noise sources.

- 7.79 In terms of the external amenity areas, both the balconies and internal and external courtyards, these are generally expected to meet acceptable noise levels and are generally sited away from the busiest surrounding areas, or internal to the development. While it may be that some of these areas are within the higher band of what is generally considered an acceptable noise level, given the town centre location that is considered to be a reasonably expected arrangement that would be outweighed by the convenience of living in such areas.
- 7.80 There are number of elements of plant and machinery necessary to support the proposed development, including a range of air source heat pumps (ASHP) and plant and extraction equipment that would be necessary to serve the commercial units. The proposed layout and form of the development has had regard to the need for these elements, and positioned them in such a way that they would not result in a harmful conglomeration of plant and machinery to the detriment of the amenity of future occupants.
- 7.81 Generally, the proposed development utilises windows facing internally to the courtyard serving most habitable rooms. While there is not a significant distance between units within the internal courtyard the development has predominantly organised windows so that those serving primary habitable rooms are not directly opposite each other. That said, those residential units in the southern wing would have their private amenity spaces, and some of the windows serving primary habitable rooms, more readily visible from both the open space to the south and from River Terrace. While the open space is restricted to occupants of the development, views from River Terrace would be possible. These would be at an oblique angle, and unlikely to give any meaningful actual view into the internal spaces within these two units, but it is likely there would be some perception of overlooking. In considering that in the context of River Terrace as a road that largely only serves the residential properties along it, and not a through road, officers consider that there is unlikely to be such a significant level of pedestrian or vehicle movement that it would be notably detrimental to occupants through perceived overlooking. On the whole, therefore officers consider the proposed residential units would not be subject to materially harmful levels of overlooking.
- 7.82 The application has been accompanied by a Daylight/Sunlight assessment that has, amongst other things, demonstrated light levels to the proposed dwellings would be to a sufficient level for habitable rooms. Officers note the orientation of units in the northern range may be restrictive in some instances, particularly in winter months when the sun is lower. That would be a reasonably expected situation, and while it might limit direct sunlight, officers consider there would remain a sufficient level of more diffuse light during those months, and it is likely to be more direct in summer. The proposed residential units are therefore considered to be afforded sufficient light levels to be provided a good standard of amenity.

- 7.83 On the whole, and subject to a condition requiring accordance with the recommendations of the noise assessment, the proposed development is considered to provide a suitable standard of amenity for future occupants in accordance with policy LP14.

Section 106 Contributions and Community Infrastructure Levy (CIL)

- 7.84 Section 106 Obligations may be sought where they meet the tests of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Such 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.
- 7.85 The development will be CIL liable in accordance with the Regulations (and exemptions contained within) and the Council's adopted charging schedule.
- 7.86 In order to calculate the required obligations, the Developer Contributions SPD (DCSPD) requires that dwelling numbers are translated into population. As the detailed design of the proposal is available at this stage, the SPD provides a calculation at 1.21 persons per 1-bed unit and 1.86 persons per 2-bed unit. This therefore translates to a total number of 22 persons, rounded to the nearest whole.
- 7.87 In summary, the following contributions have been identified as being required by the adopted DCSPD, or requested by consultees;
- That 40% (up to 6no. units) of the units provided as affordable dwellings, 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).
 - At least 466m² of Informal Open Space (or equivalent offsite contribution at £3,681.92).
 - A contribution towards wheeled bins of £170 per dwelling or £669 per shared bin.

Affordable Housing

- 7.88 As set out in adopted policy LP24, proposals of this scale are required to contribute towards affordable housing, providing 40% of the dwellings as affordable units. Of the proposed 14 units this would represent a total of 6 affordable units. Criterion b. of policy LP24, together with the supporting text at paragraph 7.9 of the Local Plan clarifies that the expectation is provision comprises is a mix of 70% social or affordable rented, and 30% shared ownership units. This is the expected starting position unless there are other considerations that may indicate a lower level of affordable housing is appropriate, and in this instance the applicant has submitted a viability assessment that seeks to demonstrate the provision of affordable housing (and other contributions) would render the scheme unviable.
- 7.89 A viability exercise has been undertaken, concluding in November 2024, with the Council advised by BPG Ltd as an independent consultant, and funded by the Developer in line with the DCSPD. This has been carried out in line with, and having regard to, best practice and the provisions of the NPPG with regards to appropriate levels of developer profit and the

approaches to funding, having regard to the built-to-rent model and the costs of the development.

- 7.90 The review has resulted in an outcome that the development is unviable. The Council's consultants have used a 'best possible' approach to test costs (i.e. a theoretical cheapest cost), and even in that context have agreed with the position of the developer that the development would be unviable. It is notable that BPG have also confirmed that the costs are likely to be closer to those indicated by the developer, and that there would be no change in the final position if the scheme was a more typical build-to-sell proposal.
- 7.91 The Council's consultants have suggested consideration is given to a viability review. While officers consider this would be a reasonable position in a large scheme, the overall number of dwellings here, with the likely short-term build-out period, is highly unlikely to result in any meaningful change in the viability position. As such, officers consider that any such review would not show any change in the actual position of the development remaining unviable by some significant margin, and it is not considered a review mechanism is appropriate in this instance.
- 7.92 As such, it is considered that to require any provision or other form of contribution towards affordable housing would further render the scheme unviable. In the context of an enabling development, and the nature of the conservation deficit, this is considered an acceptable position in this instance, having been demonstrated through a viability review in accordance with policy LP24.

Green Space

- 7.93 In accordance with the DCSPD, the required provisions for on-site open space to be delivered based on the quantum of development proposed for the application is a minimum of 466m² of public open green space, based on a calculation of 21.2m² per person. No comments have been received in respect of open space provision within the site, and the application proposes a small area of private green space to the southern side of the site, at approximately 145m², some 320m² below the requirements of the DCSPD. No offsite contributions are proposed, and noting the viability position, as set out above, no contribution would be able to be sought in any event.
- 7.94 It is noted that, while the onsite area is not publicly accessible, it is readily available to the occupants of the development, who have limited private amenity spaces, and so would provide some level of mitigation for the impacts of the proposal. It is also noted that the development is located less than 5 minute walk from Riverside Park, a significant area of public open space that would afford future occupants ready access to recreational open space. While the private open space to the south of the site is limited, the applicant has suggested a need to limit potential anti-social behaviour, and it is noted there is some experience with this within the site, albeit officers consider this likely driven by the lack of users within the site to provide any oversight. That said, the close proximity to future residential areas, including their private amenity space and bedrooms serving primary habitable accommodation at ground floor, is considered likely to mean that a freely public open space area in this location would result in an adverse impact to the future occupant's residential amenity through overlooking.

- 7.95 While the development does not provide open space sufficient to meet the requirements of the DCSPD, for the reasons set out above, officers consider the actual harm is limited. This is considered further below in the conclusions on the overall balance of the proposal.

Wheeled Bins

- 7.96 A contribution towards waste would be required, specifically to the provision of wheeled bins to serve residential units within the development. The amount required would be based on a per dwelling calculation, of £170 per dwelling. 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. 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.

Conclusion

- 7.97 Overall, of the obligations that have been identified and requested, the following are considered to meet the tests in 122 of the CIL Regulations and following the outcomes of the viability report, would accord with policy LP4. They are recommended to be sought through a S106 legal agreement in the event of a resolution to approve;
- A contribution towards wheeled bins of £170 per dwelling or £669 per shared bin.
- 7.98 Subject to securing this element, and any other planning obligations identified above in respect of those matters where delegated powers are sought, officers consider the proposed development would accord with policy LP4.

Other Matters

- 7.99 Policy LP12 requires that all dwellings accord with the optional Building Regulations requirement for water efficiency. It is necessary to impose a condition requiring this standard to be adhered to, and given the wholly minimal financial implication of this standard, officers consider this remains a necessary and appropriate condition to balance water demand without materially impacting the current viability position.

8. Planning Balance and Conclusions

- 8.1 The application must be considered in accordance with the statutory tests in s.38 (6) of the Planning and Compulsory Purchase Act 2004, namely, in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2 As set out above, the application is put forward as an enabling development proposal, namely that any conflict with adopted policy is outweighed by the benefit of securing the future of the heritage asset, in accordance with NPPF para. 221.

- 8.3 In respect of matters of design and housing mix, transport and ecology, impacts to amenity and contamination, as set out above these are considered to be acceptable and in accordance with adopted policy. While the principle of development is considered acceptable in terms of the location and proposed uses within a built-up area and the general strategy of development, the principle of development in respect of the flood zone is being considered further.
- 8.4 In respect to matters of flood risk, and noting the section set out above, further consideration is being given to the appropriate application of the Sequential Test, and to the technical impacts of the development in accordance with the exception test, namely that future occupants of the proposed development will be safe for its lifetime and that it will not materially increase flood risk elsewhere. Accordance with the exception test, noting the points below in respect to other sustainability benefits of the proposal, would be considered sufficient to meet the requirements of the exception test in accordance with NPPF para. 178. Officers consider that, if the proposal otherwise accords with these requirements, then in the context of the strategic nature of the policy and its aims, this would limit the weight to be afforded to the conflict with policy in respect to the sequential test to a substantial weight.
- 8.5 As set out above, there is also considered to be a level of a less than significant harm arising to the significance of the heritage asset through the removal of historic fabric, and as some of the proposed new-build elements will result in a change in the setting and experience of the river frontage, in conflict with the historic arrangement of the boathouse. That said, the context of much of the work here is to identify a solution to secure the long-term retention of the frontage of the building, to safeguard its position and the contribution it makes to the area. As such, officers consider that the level of harm, and the weight to be afforded to that harm in the overall planning balance, is low-moderate.
- 8.6 There is a conflict with adopted policy requirements in respect to the provision of open space. As noted above there is a significant local provision in close proximity to the development site with some small scale provision onsite that would support the development itself, albeit below policy thresholds. In the context of the development's requirements and the conflict with policy, but noting the local provision in place, officers consider this carries a minor weight against the proposal.
- 8.7 In terms of benefits of the proposal, it is considered that, subject to appropriate control to ensure the works are carried out, the proposed works are considered necessary to facilitate the repair and safeguarding of the main listed building as the historic core of the site. The application has adequately demonstrated the substantial conservation deficit, and for the wider development is therefore considered sufficiently established. As such, the safeguarding of the heritage asset, particularly one located in a prominent location as part of the historic core of the town, is considered to carry a substantial weight in favour of the proposal.
- 8.8 Additionally, the proposed works would generally improve the visual amenity of the site, which in turn would contribute to an improvement in the setting of the surrounded listed buildings, and to the Conservation

Area as heritage assets. This is considered to carry a moderate weight in favour of the proposal.

- 8.9 The development would provide economic benefits through the building works themselves as part of the need to source materials and labour, albeit for a limited timescale, but in addition would provide 2no. commercial units fronting onto the Market Square, supporting the vitality and viability of the Town Centre. The proposed residential units, given the position in relation to shops, is also considered to provide an economic benefit through promoting local shopping trends and increased contribution to the nighttime economy. Cumulatively, these are considered to carry a moderate weight.
- 8.10 The addition of residential units, particularly in the rental market that is not normally a form of development that comes forward and proposing smaller units, is considered to carry a moderate social benefit in favour of the development. This would support a different range of prospective occupants than would normally arise from more typical build-to-sell developments and would increase housing stock within a highly sustainable location in terms of access to services.
- 8.11 It is noted that there remain matters for consideration in respect of flood risk, and as a strategic policy within the adopted Local Plan that is also given great weight in national policy, officers consider there is a clear threshold at which the benefits and disbenefits of the proposed development strikes an appropriate balance. It is considered that there is reasonable potential that the significant benefits of the scheme would be capable of outweighing the disbenefits of departing with policy. Subject to satisfactory resolution of flood risk issues, on the terms set out in the relevant flood risk section above, officers therefore consider the balance weighs substantially in favour of approval.

9. RECOMMENDATION – In respect of both applications 24/01827/HDC & 24/01828/LBC, powers be delegated to the Head of Planning, Infrastructure and Public Protection for:

APPROVAL subject to completion of a planning obligation, the resolution of matters of ecology and biodiversity, resolution of flood risk matters, and subject to carrying out any appropriate referrals and advertisements necessary in accordance with relevant legislation, and conditions, including in relation to the following;

Full application - 24/01827/HDC;

1. 3-year time limit to implement
2. Accordance with approved plans
3. Development to be carried out in accordance with phasing arrangements.
4. Construction management plan to be submitted
5. Details of commercial extraction or ventilation systems to be submitted
6. Recommendations of noise report to be carried out
7. Land contamination Remediation
8. Unidentified Contamination to be remediated

9. Ecological protections to be carried out
10. Copy of any protected species licence to be submitted
11. Tree protection measures to be implemented
12. Detailed planting plans to be submitted
13. Material details to be submitted
14. Architectural details to be submitted
15. Boundary treatment details to be submitted
16. Water efficiency requirements
17. Cycle and bin stores to be provided and retained
18. Flood risk protections

Listed Building Application - 24/01828/LBC

1. 3-year time limit to implement
2. Accordance with approved plans
3. Development to be carried out in accordance with phasing arrangements
4. Details of structural supports to be used during construction to be submitted
5. Details of fixtures on 15C ceiling to be submitted
6. Details of gates and associated fixture to coach arch to be submitted
7. Schedule of works to windows to be submitted
8. Windows details of any secondary or double glazed windows to be submitted
9. Detailed balcony drawings to be submitted
10. Material details for chimneys and roof tiles to be submitted
11. Details of any cellar flood mitigation
12. Schedule of roof repairs to be submitted
13. Schedule of repairs to lath and plaster ceiling to be submitted
14. Schedule of repairs to timber frame to be submitted
15. Details of replacement render to be submitted

OR

REFUSAL in the event that the planning 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, or in the event that matters of ecology and biodiversity, flood risk cannot be satisfactorily resolved.

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 **Aaron Sands, Senior Development Management Officer** aaron.sands@huntingdonshire.gov.uk

No.	Reference	Development	SNTC Decision	Notes
-----	-----------	-------------	---------------	-------

The following application/s are for listed building consent

S4	24/01828/LBC & 24/01827/HDC	<p>HDC Hotel 10 - 14 Market Square St Neots Internal and External alterations and Change of Use of Hotel (Class C2) to 2no. Commercial Units (Class E) and 5no. Residential units (Class C3)</p>	SUPPORT	Members are pleased to see this building being returned to use; however, there is some disappointment that a hotel could not be incorporated in the proposed plans.
----	-----------------------------	--	----------------	---

The following application/s are in a conservation area

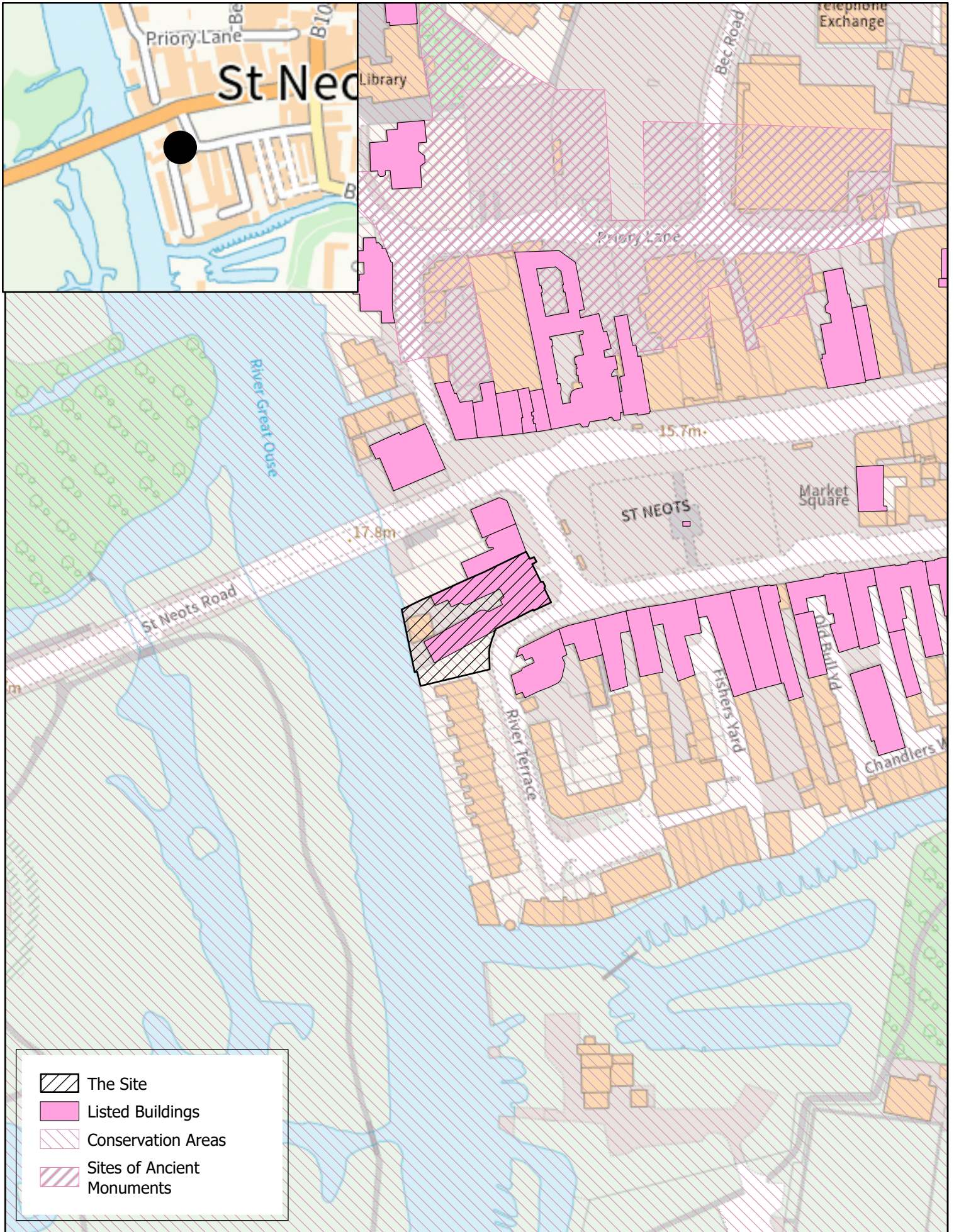
Development Management Committee

Application Ref: 24/01827/HDC & 24/01828/LBC



Scale = 1:1,500

Date Created: 05/02/2025



Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

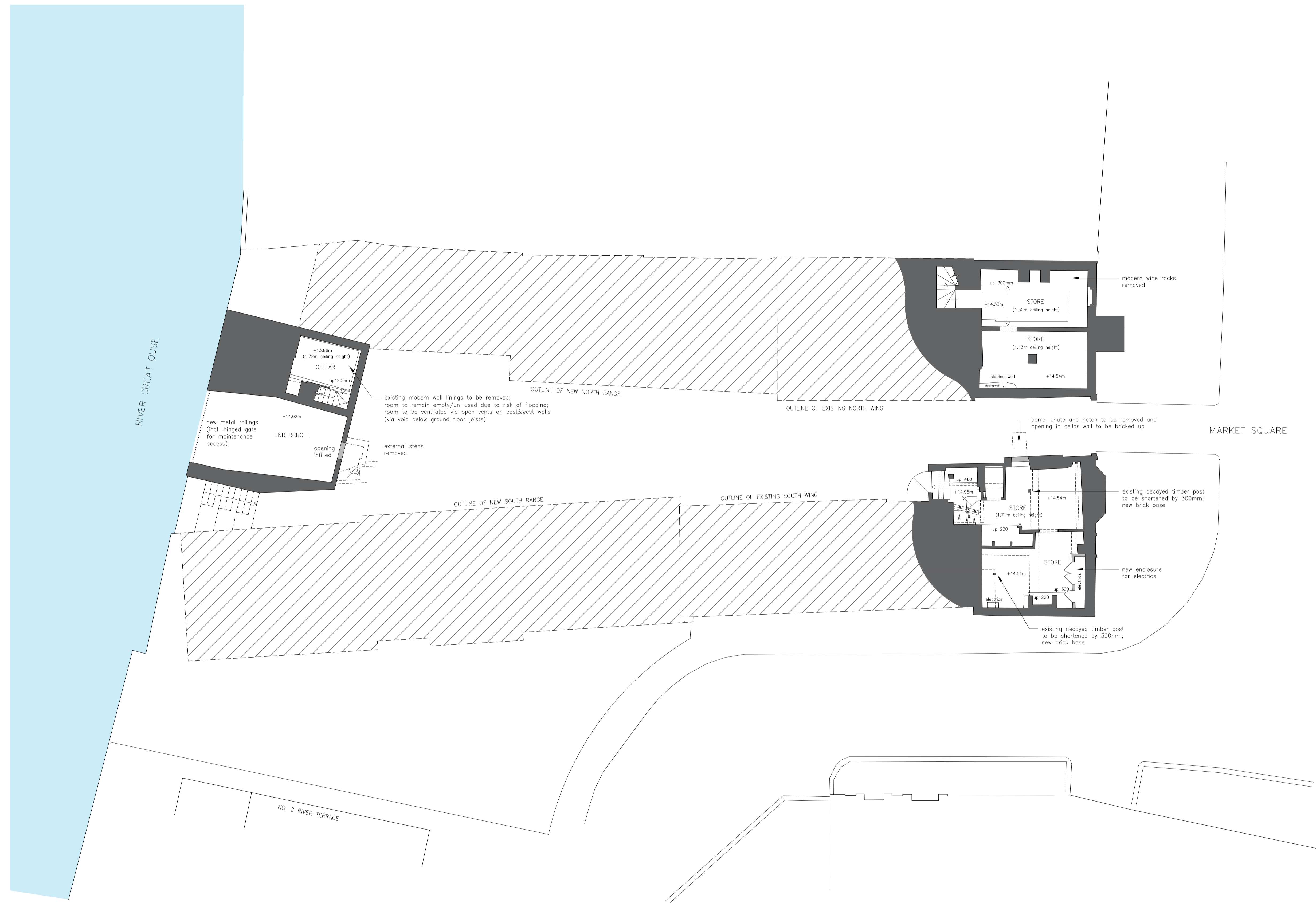
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PROPOSED (BASEMENT)



A 30/09/2024 Planning Issue

revisions

SCALE 1:100

PLANNING

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 365555 info@frarchitects.co.uk

client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Basement Floor

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 101	A

Notes

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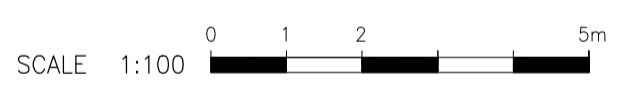
PROPOSED (GROUND FLOOR)



MARKET SQUARE

RIVER TERRACE

- B 06/12/2024 Dry-lining to bin/bike stores omitted; see revision cloud
- A 30/09/2024 Planning Issue



PLANNING

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Ground Floor

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024
drawing no.	rev		
24.012 - 3 - 102	B		

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

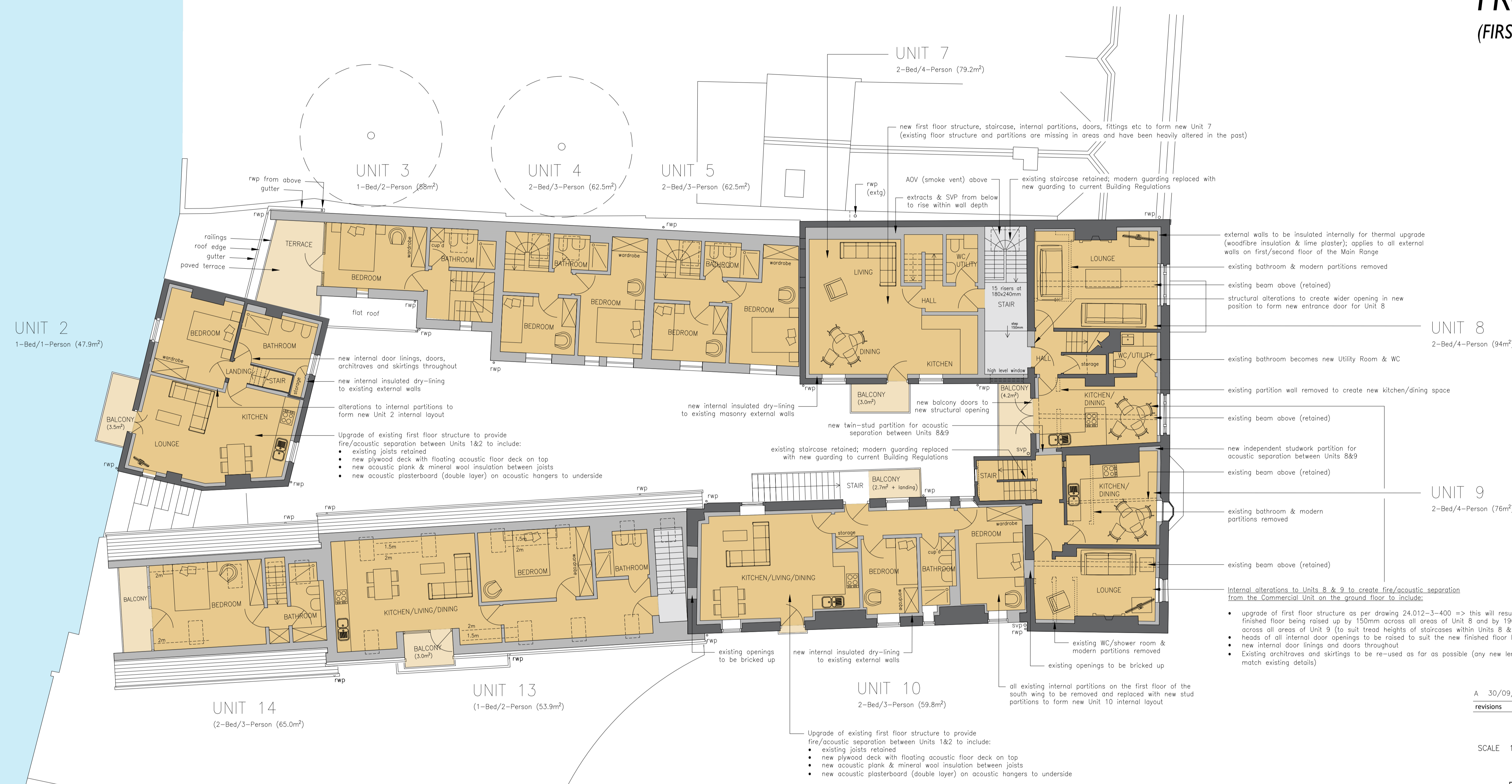
All levels and dimensions must be checked on site and any discrepancies notified to the Architect immediately.

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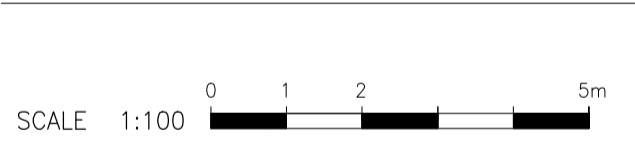
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PROPOSED (FIRST FLOOR)



A 30/09/2024 Planning Issue



PLANNING

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed First Floor

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 103	A

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

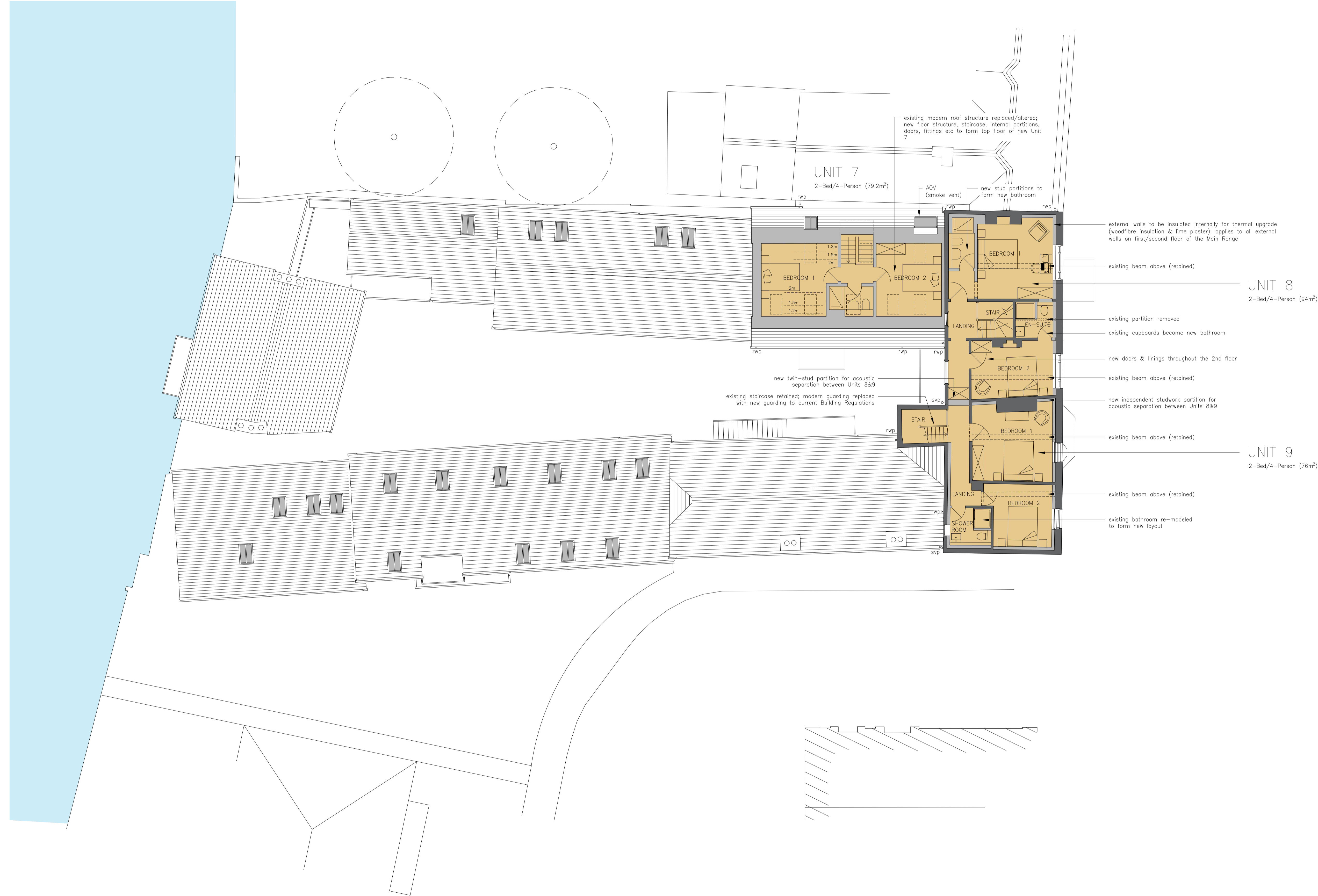
All levels and dimensions must be checked on site and any discrepancies notified to the Architect immediately.

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PROPOSED (SECOND FLOOR)



A 30/09/2024 Planning Issue
revisions

SCALE 1:100

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Second Floor

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 104	A

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

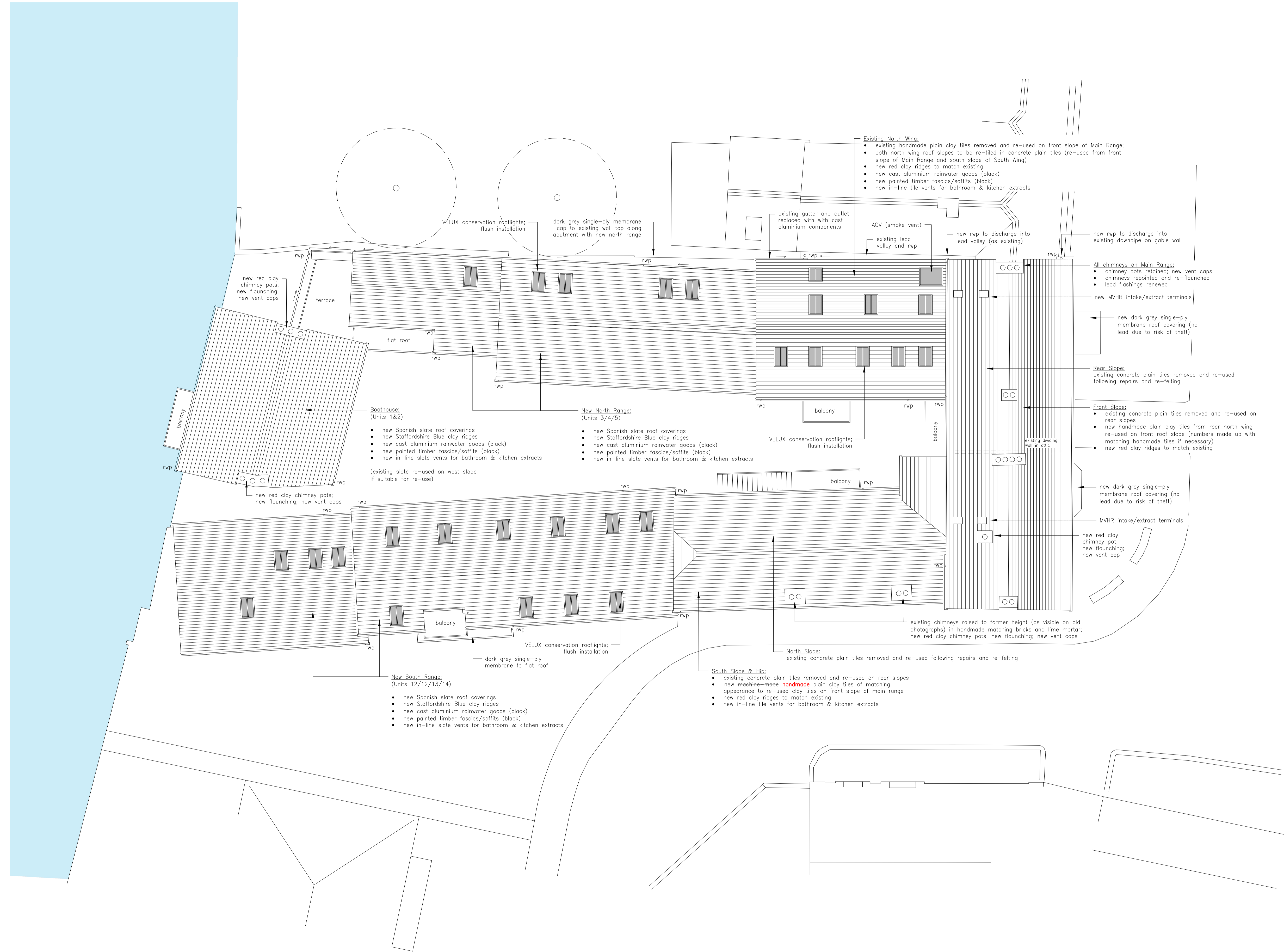
All levels and dimensions must be checked on site and any discrepancies notified to the Architect immediately.

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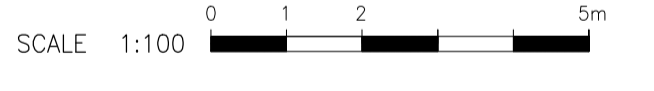
PROPOSED (ROOF PLAN)



B 06/12/2024 Roof tiles for south wing south slope changed from machine-made to handmade clay tiles

A 30/09/2024 Planning Issue

revisions



PLANNING

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Roof Plan

scale	size	drawn	date
1:100	A1	AH/JW	Aug 2024

drawing no.	rev
24.012 - 3 - 105	B

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

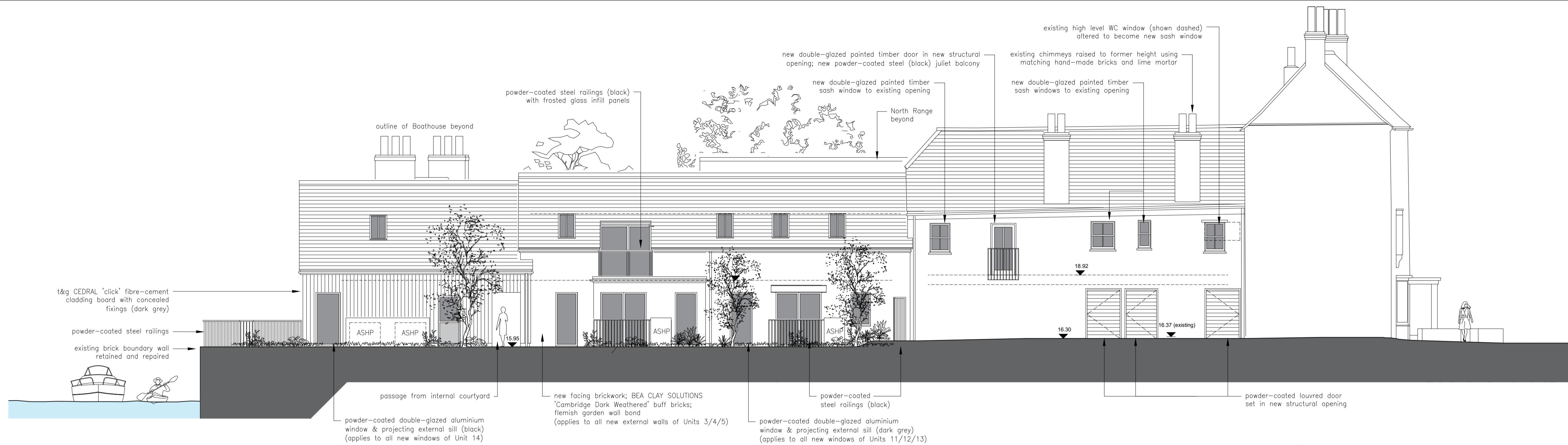
All levels and dimensions must be checked on site and any discrepancies notified to the Architect immediately.

Drawings must not be scaled. Use figured dimensions only.

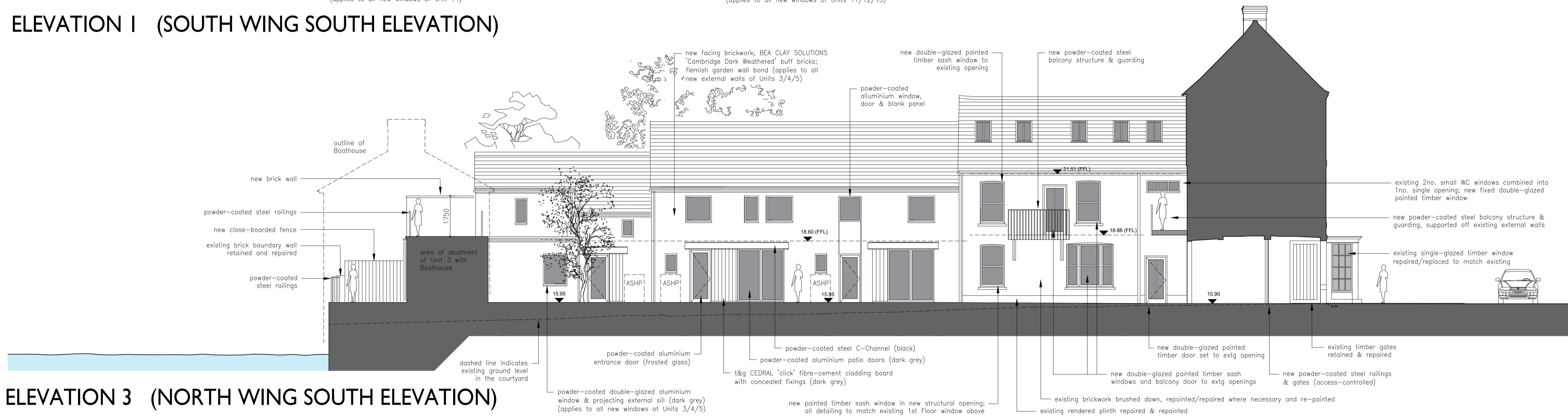
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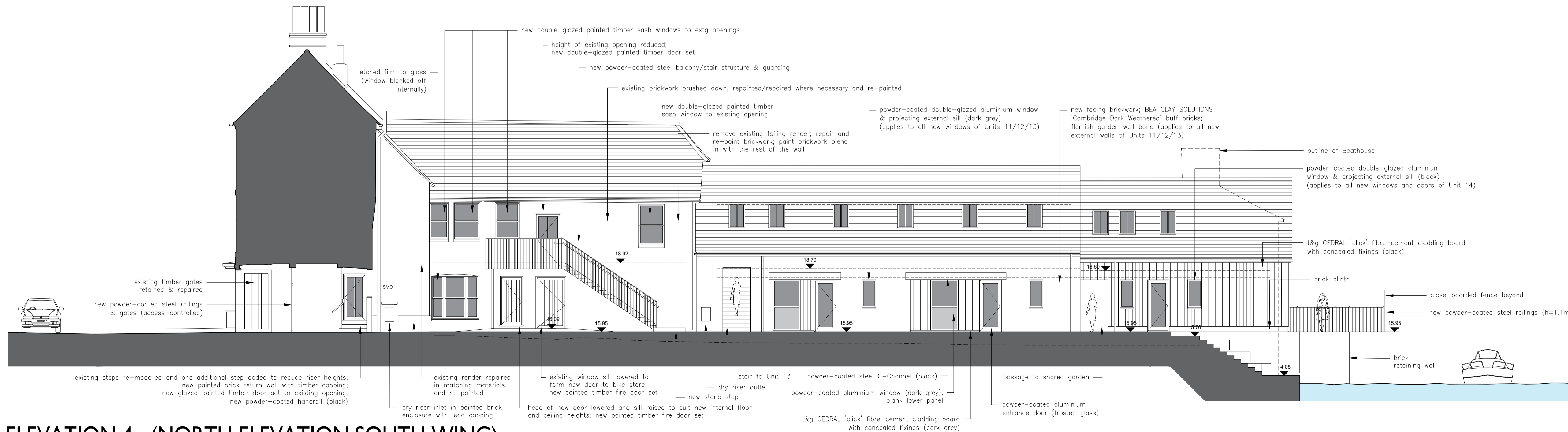
PROPOSED (ELEVATIONS)



ELEVATION 1 (SOUTH WING SOUTH ELEVATION)

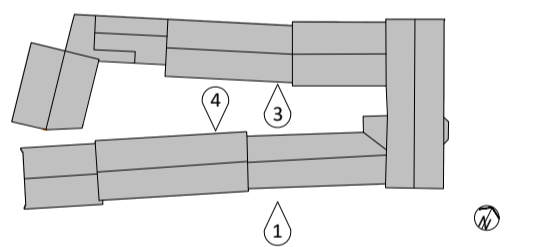


ELEVATION 3 (NORTH WING SOUTH ELEVATION)



ELEVATION 4 (NORTH ELEVATION SOUTH WING)

ELEVATION PLAN



A 30/09/2024 Planning Issue

revisions

SCALE 1:100

PLANNING

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client
Huntingdonshire District Council & Whitfield Property Investments

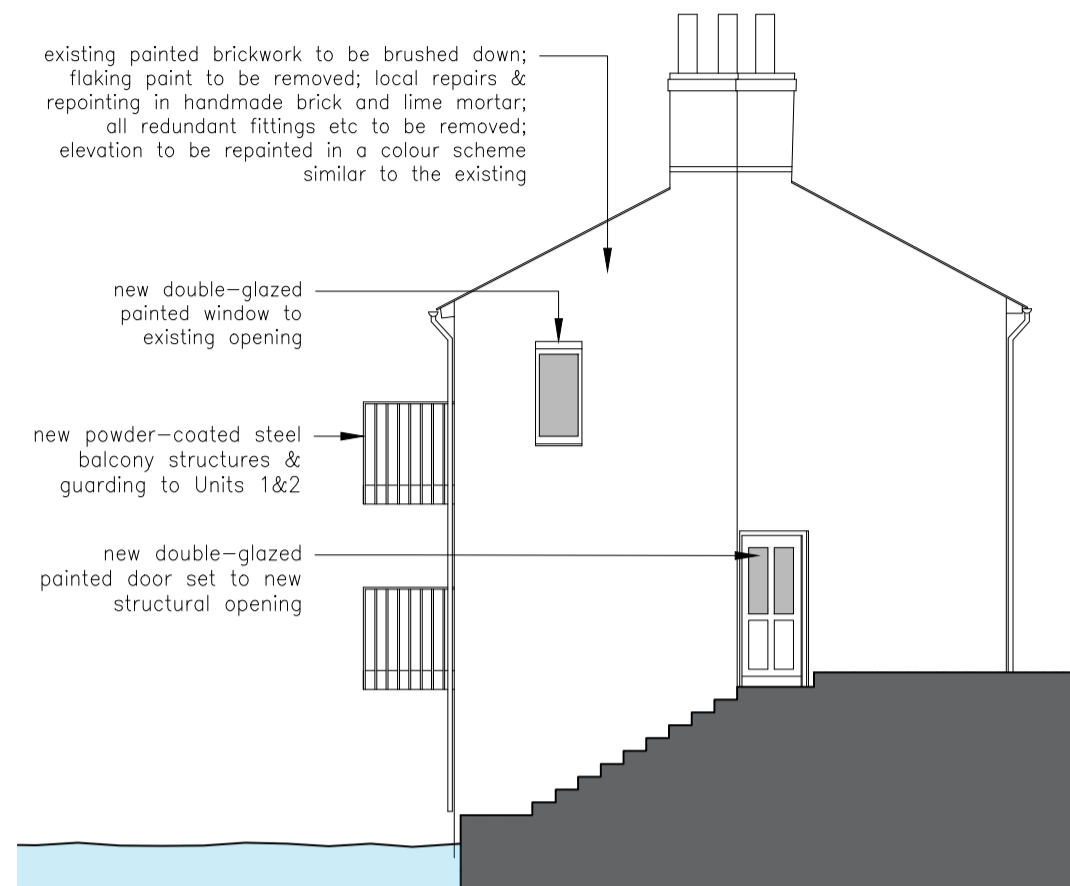
job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Elevations - Sheet 1

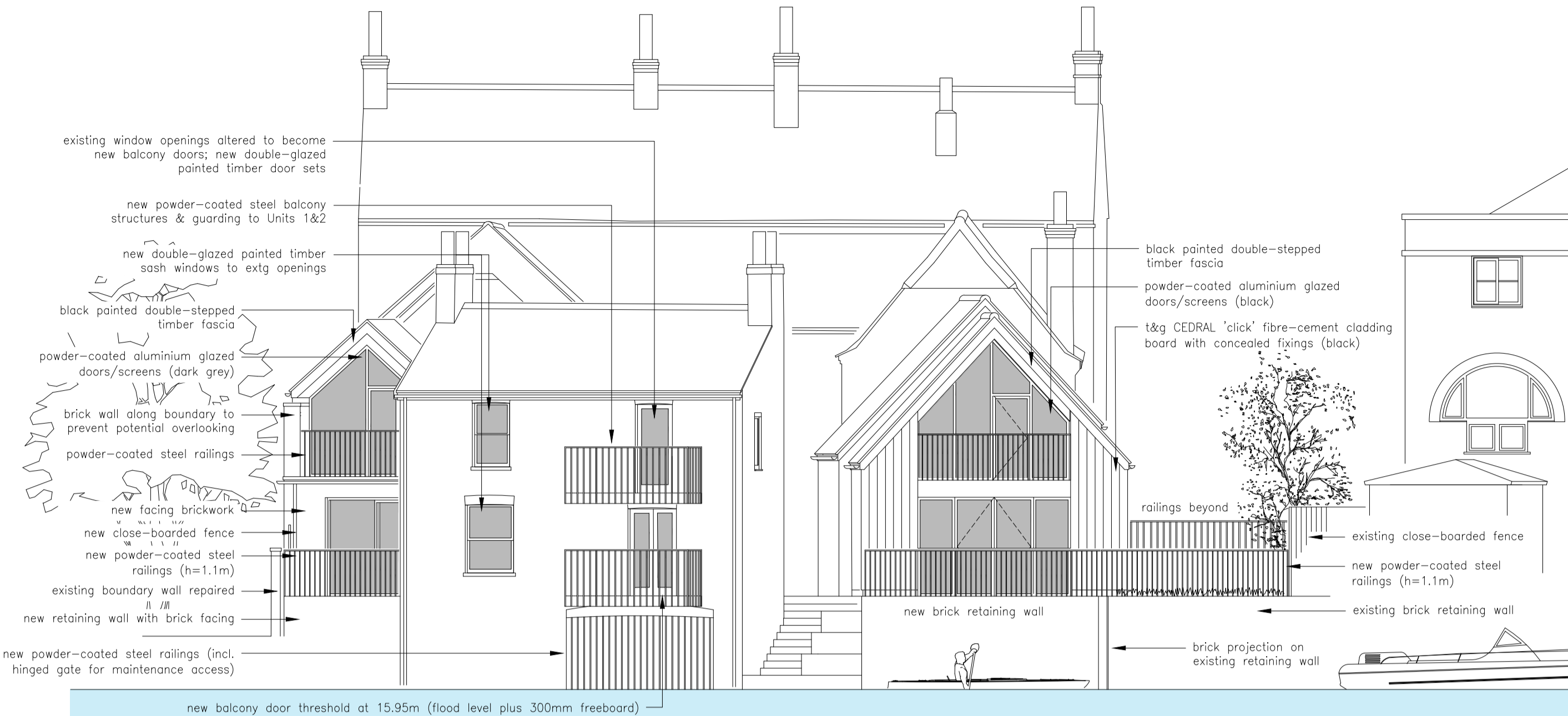
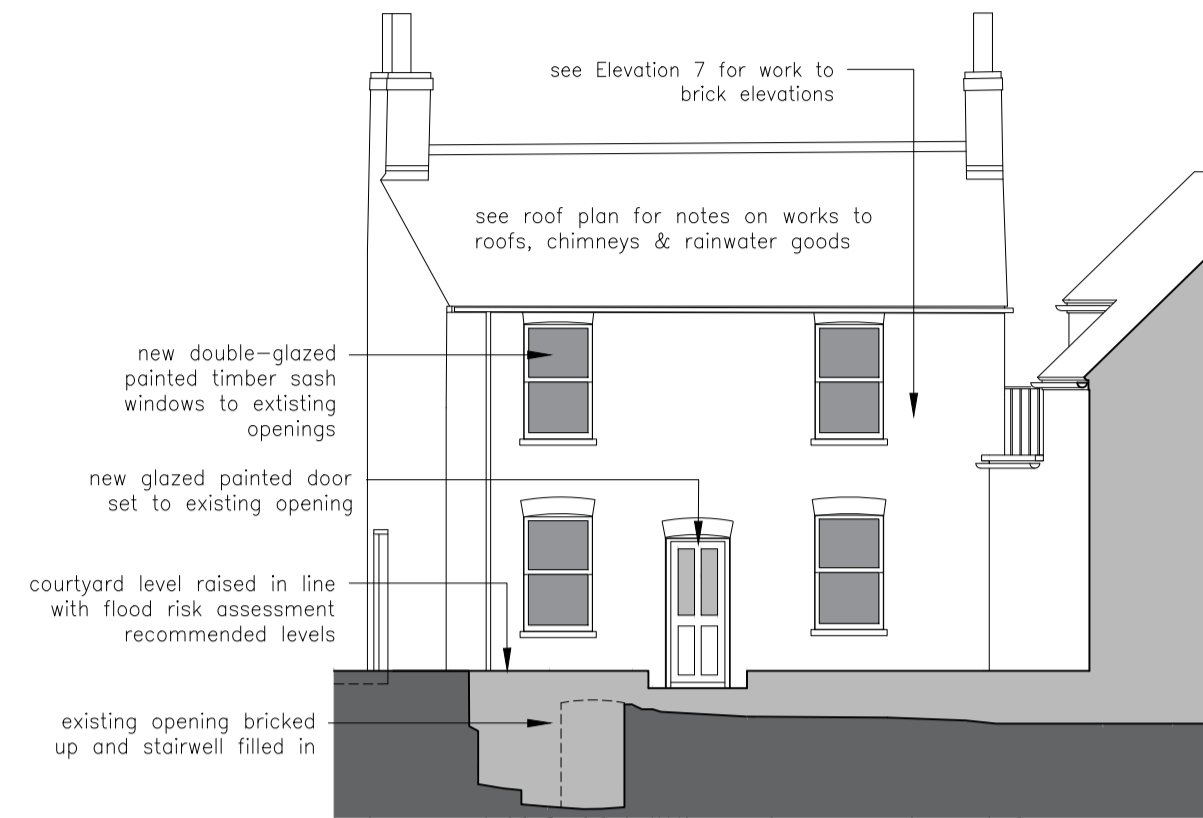
scale 1:100 size A1 drawn AH/JW date Aug 2024

drawing no. 24.012 - 3 - 300 rev A

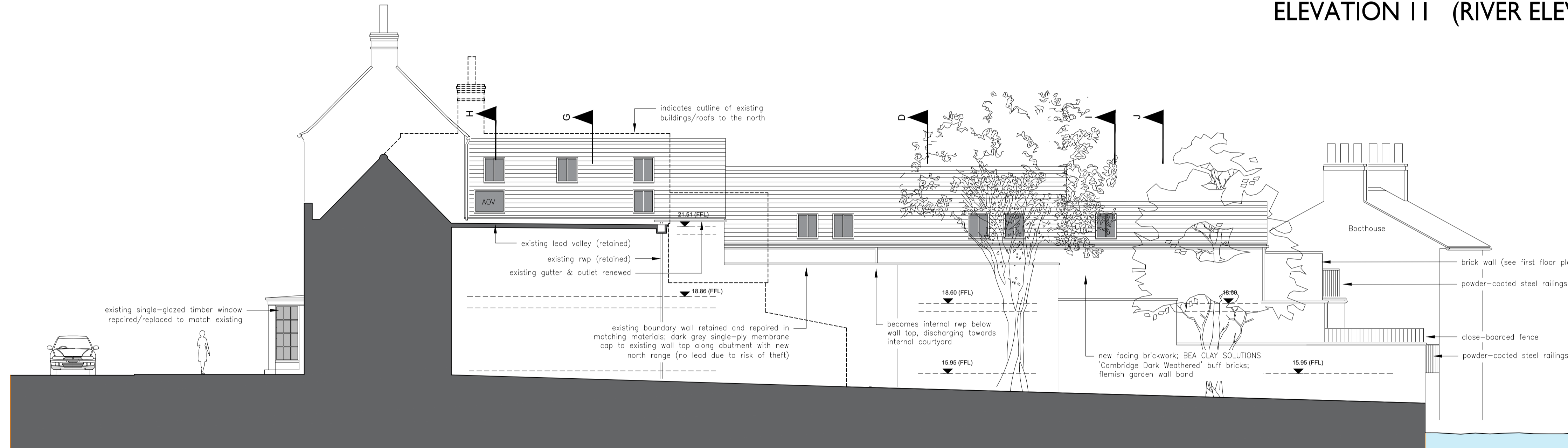
ELEVATION 7 (BOATHOUSE - SOUTH)



ELEVATION 8 (BOATHOUSE EAST)



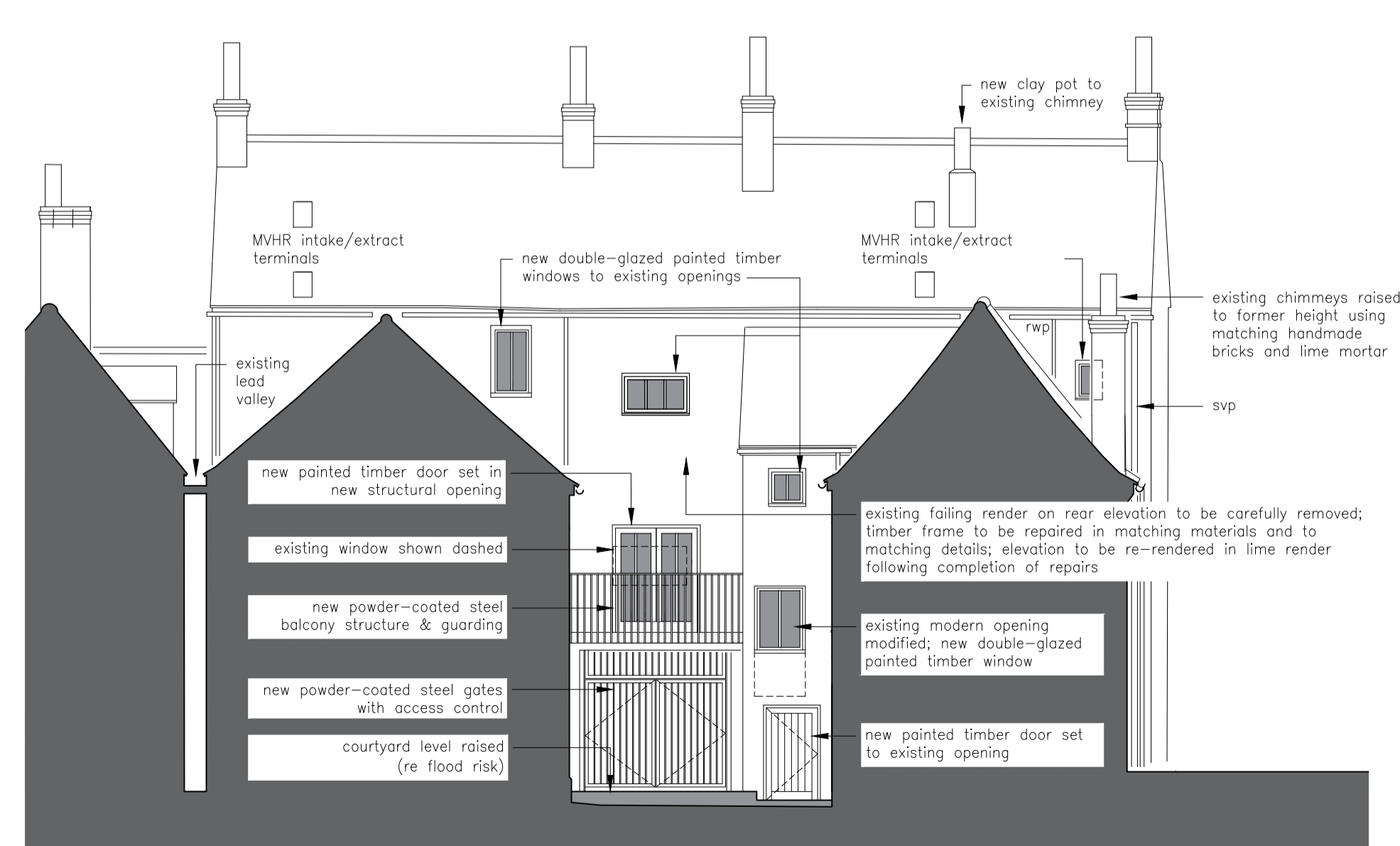
ELEVATION 11 (RIVER ELEVATION)



ELEVATION 12 (NORTH WING NORTH ELEVATION)



ELEVATION 2 (MARKET SQUARE)



ELEVATION 5 (MAIN RANGE - REAR ELEVATION)

Notes

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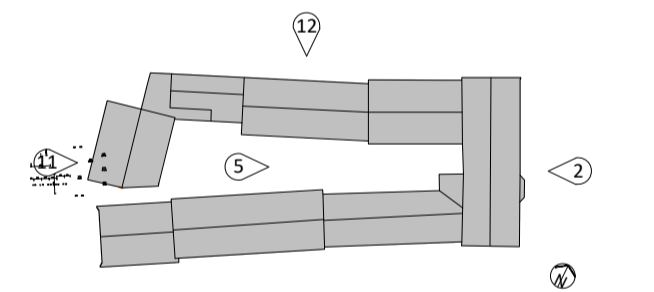
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PROPOSED (ELEVATIONS)

ELEVATION PLAN



A 30/09/2024 Planning Issue

revisions

SCALE 1:100

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Elevations - Sheet 2

scale	size	drawn	date
1:100	A1	AH/JW	08/24
drawing no.			rev
24.012 - 3 - 301			A

Notes

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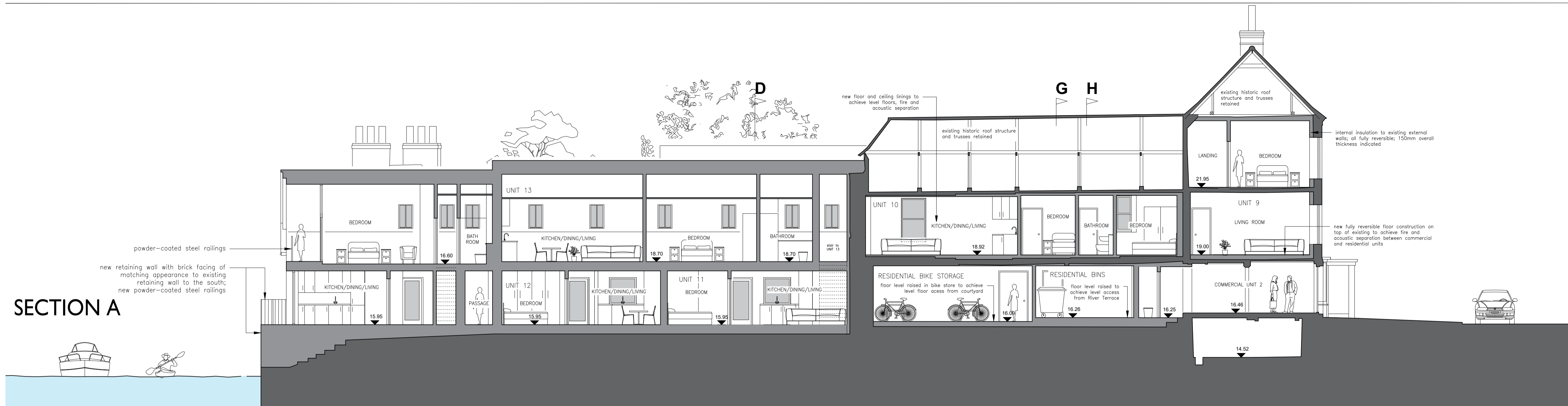
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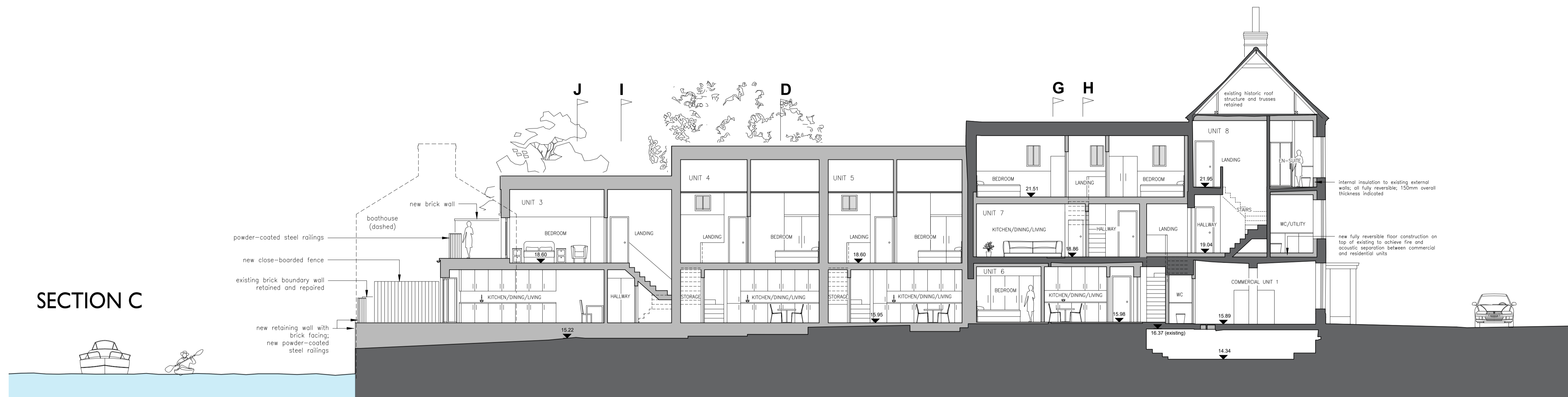
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PROPOSED

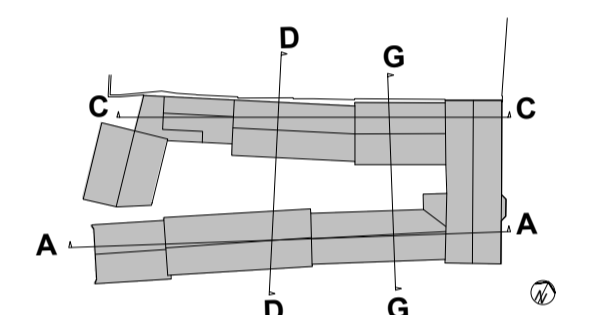
(SECTIONS A,C,D,G)



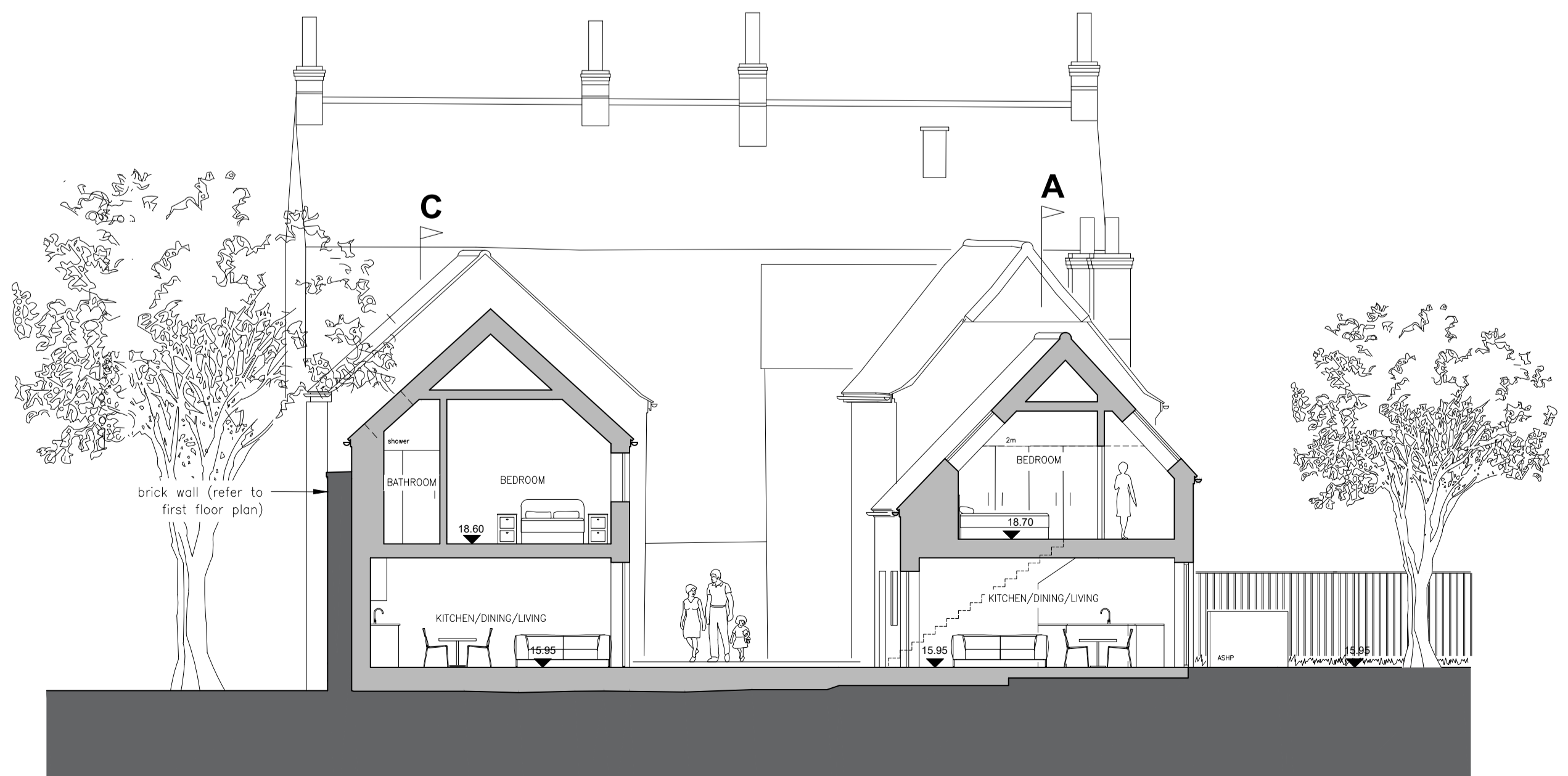
SECTION A



SECTION C



SECTION PLAN



SECTION D



SECTION G

A 30/09/2024 Planning Issue

revisions

SCALE 1:100

PLANNING

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client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Proposed Sections - Sheet 1

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 200	A

Notes

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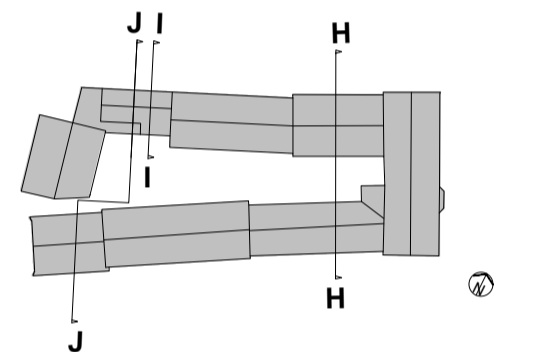
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PROPOSED

(SECTIONS H, I, J)



SECTION H



SECTION PLAN



SECTION I



SECTION J

A 30/09/2024 Planning Issue

revisions

SCALE 1:100

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client
Huntingdonshire District Council &
Whitfield Property Investments

job title
Old Falcon Inn, St Neots
Alterations & Redevelopment

drawing title
Proposed Sections - Sheet 2

scale size drawn date
1:100 A1 AH/JW Sep 2024

drawing no. rev
24.012 - 3 - 201 A



RIVER VIEW



AERIAL VIEW FROM RIVER



ENTRANCE VIEW OF COURTYARD

PLANNING

A 30/09/2024 Planning Issue

revisions

client HDC & Whitfield Property Investments		job title Old Falcon Inn, St. Neots Alterations & Redevelopment		Freeland Rees Roberts Architects 25 City Road, Cambridge CB1 1DP 01223 366555 info@frrarchitects.co.uk		
drawing title 3D Sketches - Sheet 1	scale NTS	size A3	drawn AH/JW	date Sept 2024	drawing no. 24.012 - SK - 080	rev A



AERIAL VIEW OF COMMUNAL GARDEN



SOUTH WING FROM COMMUNAL GARDEN



STREET VIEW OF SOUTH WING

PLANNING

A 30/09/2024 Planning Issue

revisions

client
HDC & Whitfield
Property Investments

job title
Old Falcon Inn, St. Neots
Alterations & Redevelopment

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 366555 info@frarchitects.co.uk

drawing title
3D Sketches - Sheet 3

scale size drawn date
NTS A3 AH/JW Sept 2024

drawing no. rev
24.012 - SK - 082 A



COURTYARD VIEW OF NORTH WING



COURTYARD VIEW OF SOUTH WING



COURTYARD VIEW OF NORTH WING

PLANNING

A 30/09/2024 Planning Issue

revisions

client
HDC & Whitfield
Property Investments

job title
Old Falcon Inn, St. Neots
Alterations & Redevelopment

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 366555 info@frarchitects.co.uk

drawing title
3D Sketches - Sheet 2

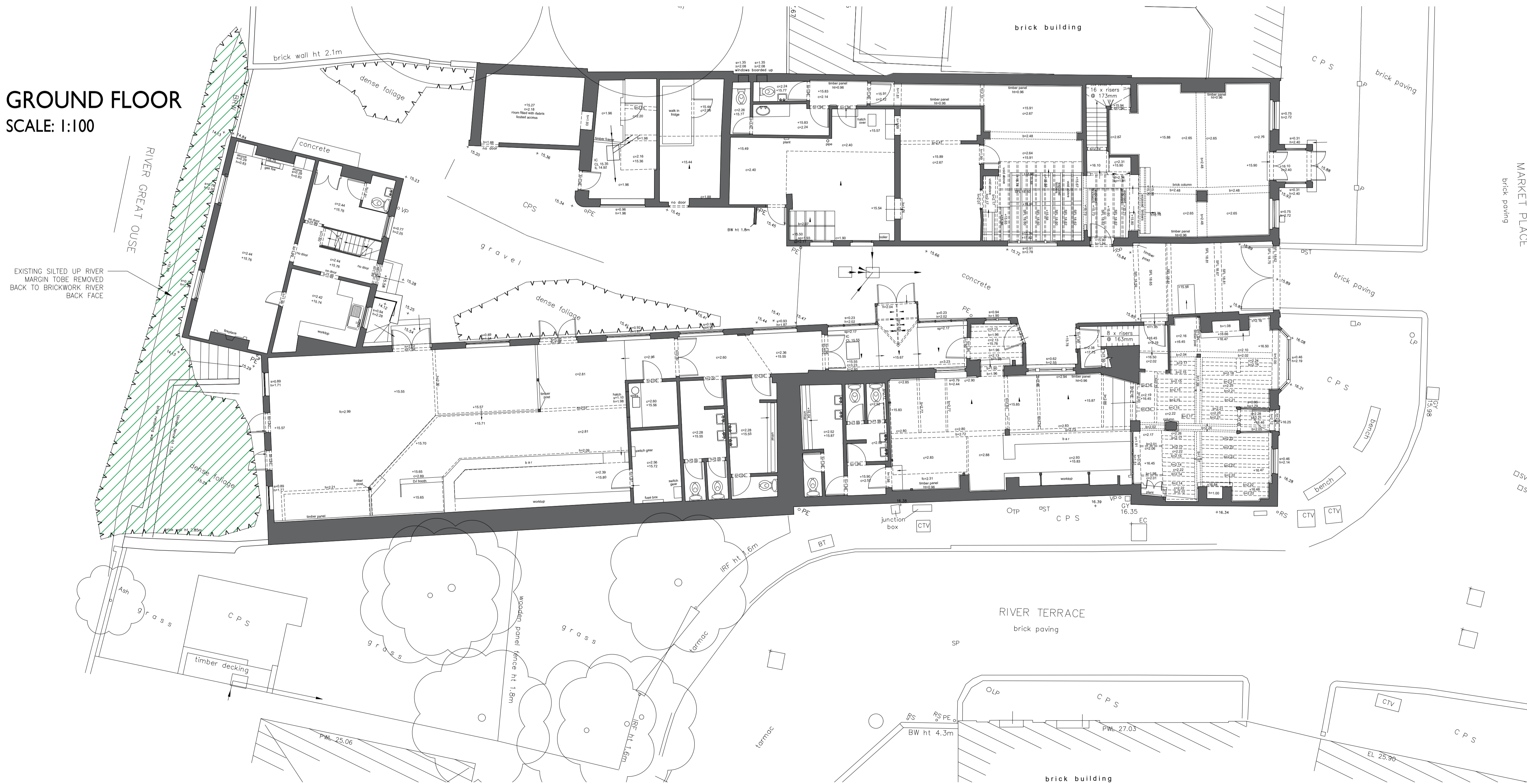
scale size drawn date
NTS A3 AH/JW Sept 2024

drawing no. rev
24.012 - SK - 081 A

BASEMENT FLOOR
SCALE: 1:100



GROUND FLOOR
SCALE: 1:100



Notes

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EXISTING
(FLOOR PLANS)

A 30/09/2024 Planning Issue

revisions

SCALE 1:100

PLANNING

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25 City Road, Cambridge CB1 1DP 01223 366555 info@frarchitects.co.uk

client
Huntingdonshire District Council &
Whitfield Property Investments

job title
Old Falcon Inn, St Neots
Alterations & Redevelopment

drawing title
Existing Basement &
Ground Floor Plans

scale 1:100 size A1 drawn AH/JW date Sep 2024

drawing no. 24.012 - 3 - 010 rev A

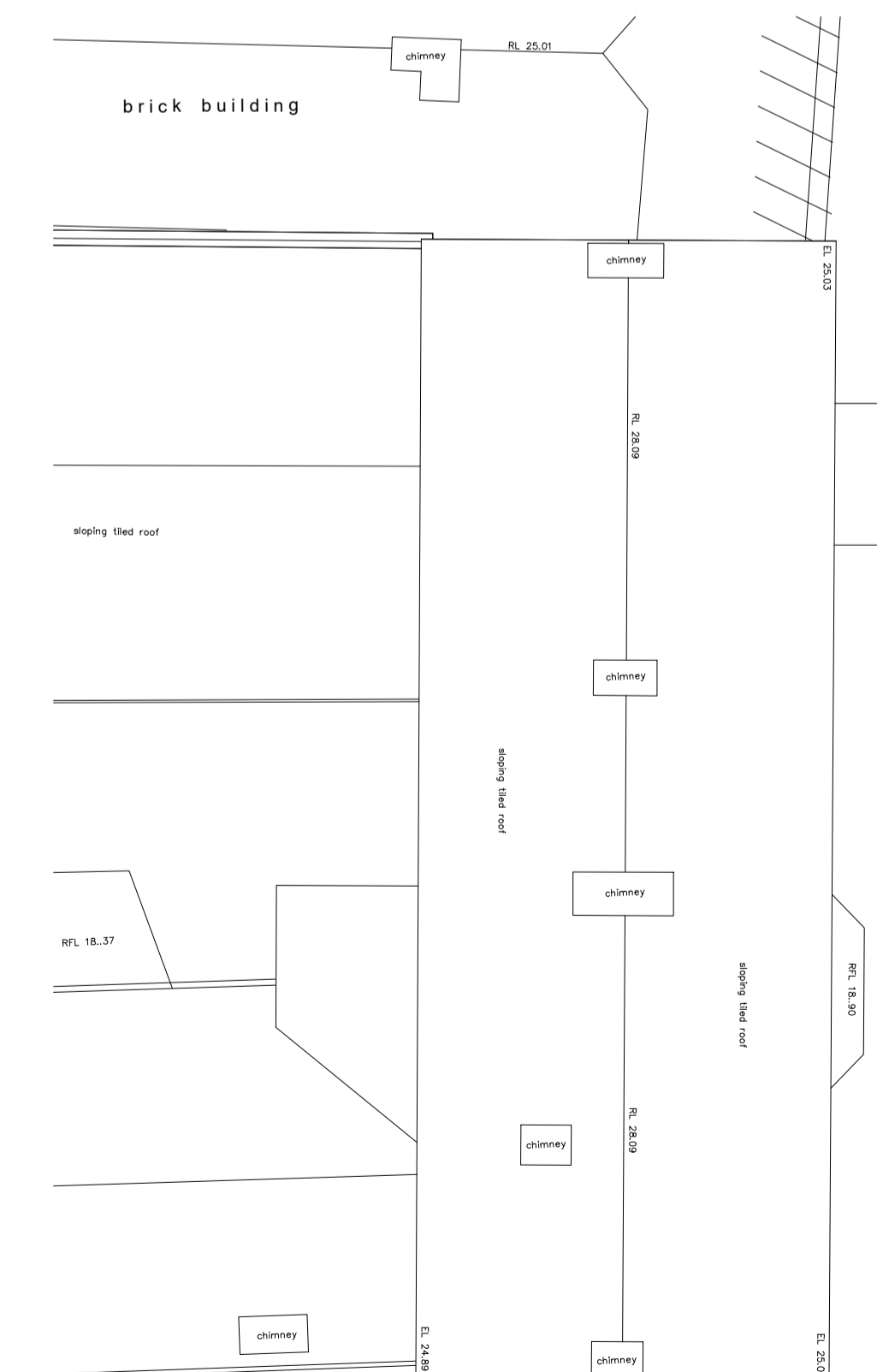
FIRST FLOOR
SCALE: 1:100



SECOND FLOOR & ROOF PLAN
SCALE: 1:100



ROOF PLAN
SCALE: 1:100



Notes

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EXISTING
(FLOOR PLANS)

B 10/10/2024 2no small windows added to 1st floor plan north range

A 30/09/2024 Planning Issue

revisions

SCALE 1:100

PLANNING

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 366555 info@frarchitects.co.uk

client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Existing First, Second and Roof Plans

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 011	B

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

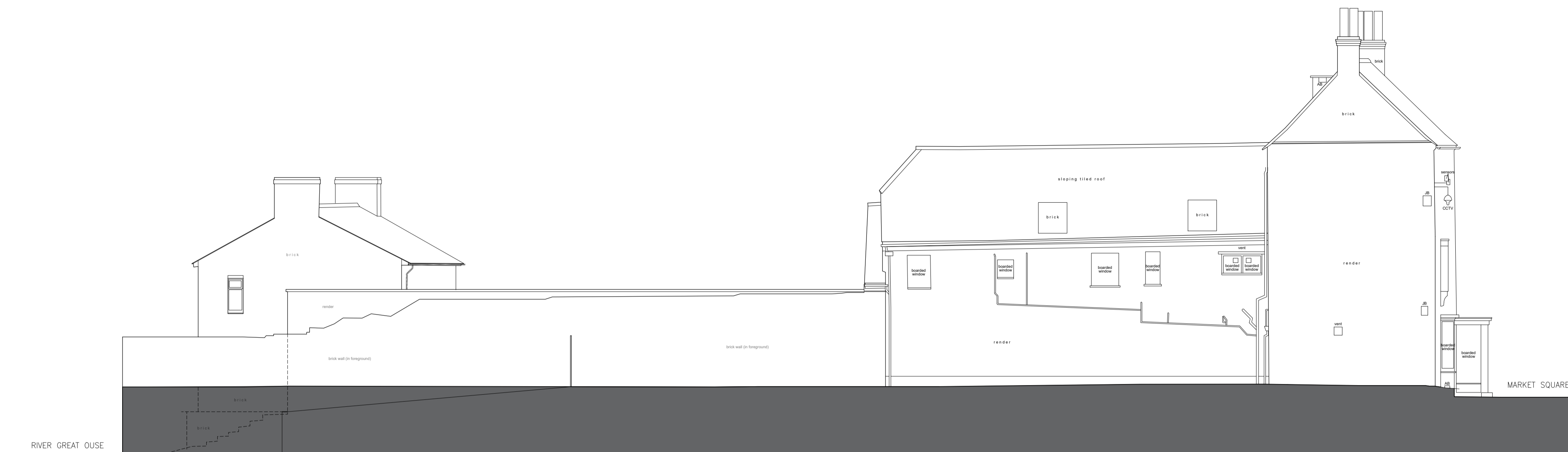
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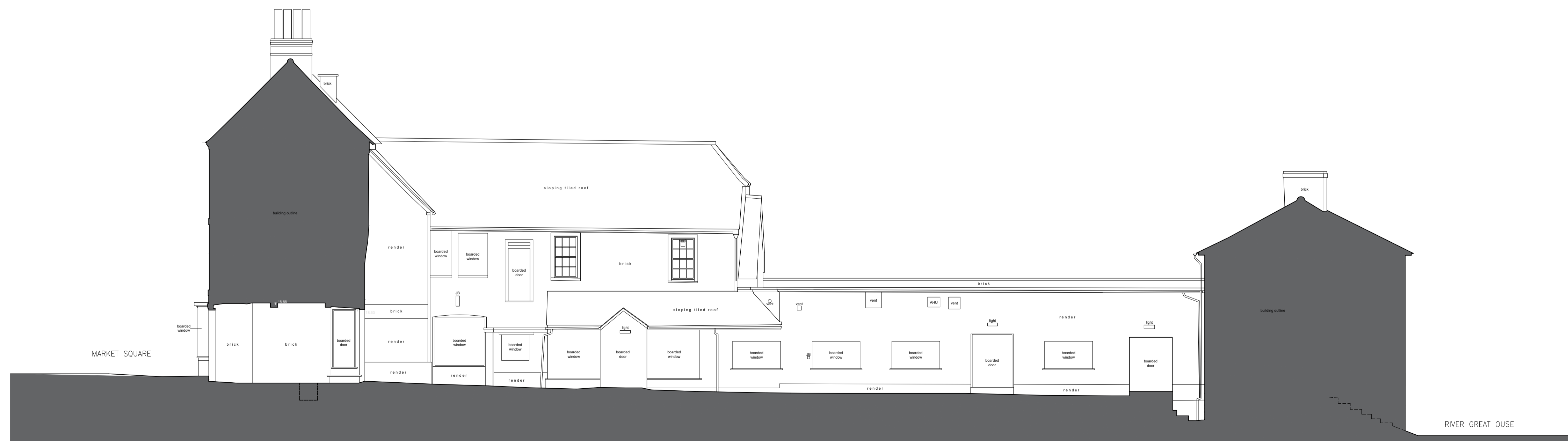
EXISTING (ELEVATIONS 1/2)



ELEVATION 1 (SOUTH ELEVATION OF SOUTH WING)

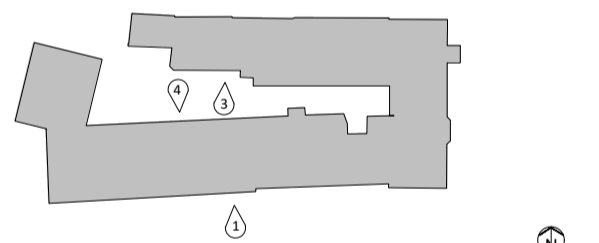


ELEVATION 3 (SOUTH ELEVATION OF NORTH WING)



ELEVATION 4 (NORTH ELEVATION OF SOUTH WING)

ELEVATION PLAN



revisions	date	description
B	10/10/2024	Elevation 1 & 3 porch labelling updated, boarded up door added to elevation 4
A	30/09/2024	Planning Issue

SCALE 1:100

PLANNING

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 365555 info@frarchitects.co.uk

client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

drawing title
Existing Elevations - Sheet 1

scale	size	drawn	date
1:100	A1	AH/JW	Sep 2024

drawing no.	rev
24.012 - 3 - 030	B

Notes

This drawings to be read in conjunction with all other documents and specifications, and other consultants drawings.

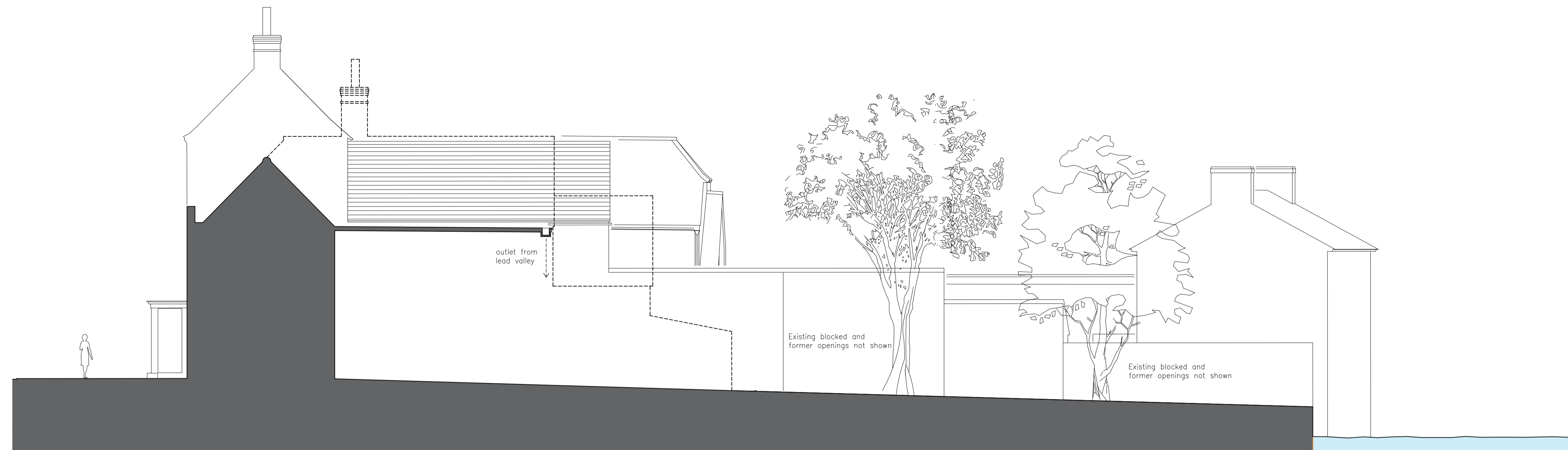
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EXISTING (ELEVATIONS 2/2)

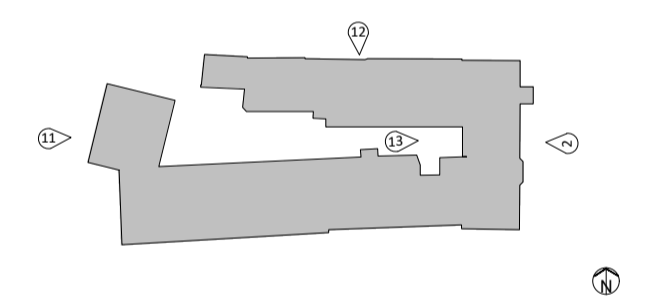


ELEVATION 12 (NORTH ELEVATION OF NORTH RANGE)



ELEVATION 11
(RIVER ELEVATION)

ELEVATION PLAN



B 10/10/2024 Elevation 11 windows added, elevation 12 - porch added
A 30/09/2024 Planning Issue

revisions
SCALE 1:100 0 1 2 5m

PLANNING

Freeland Rees Roberts Architects
25 City Road, Cambridge CB1 1DP 01223 366555 info@frarchitects.co.uk

client
Huntingdonshire District Council & Whitfield Property Investments

job title
Old Falcon Inn, St Neots Alterations & Redevelopment

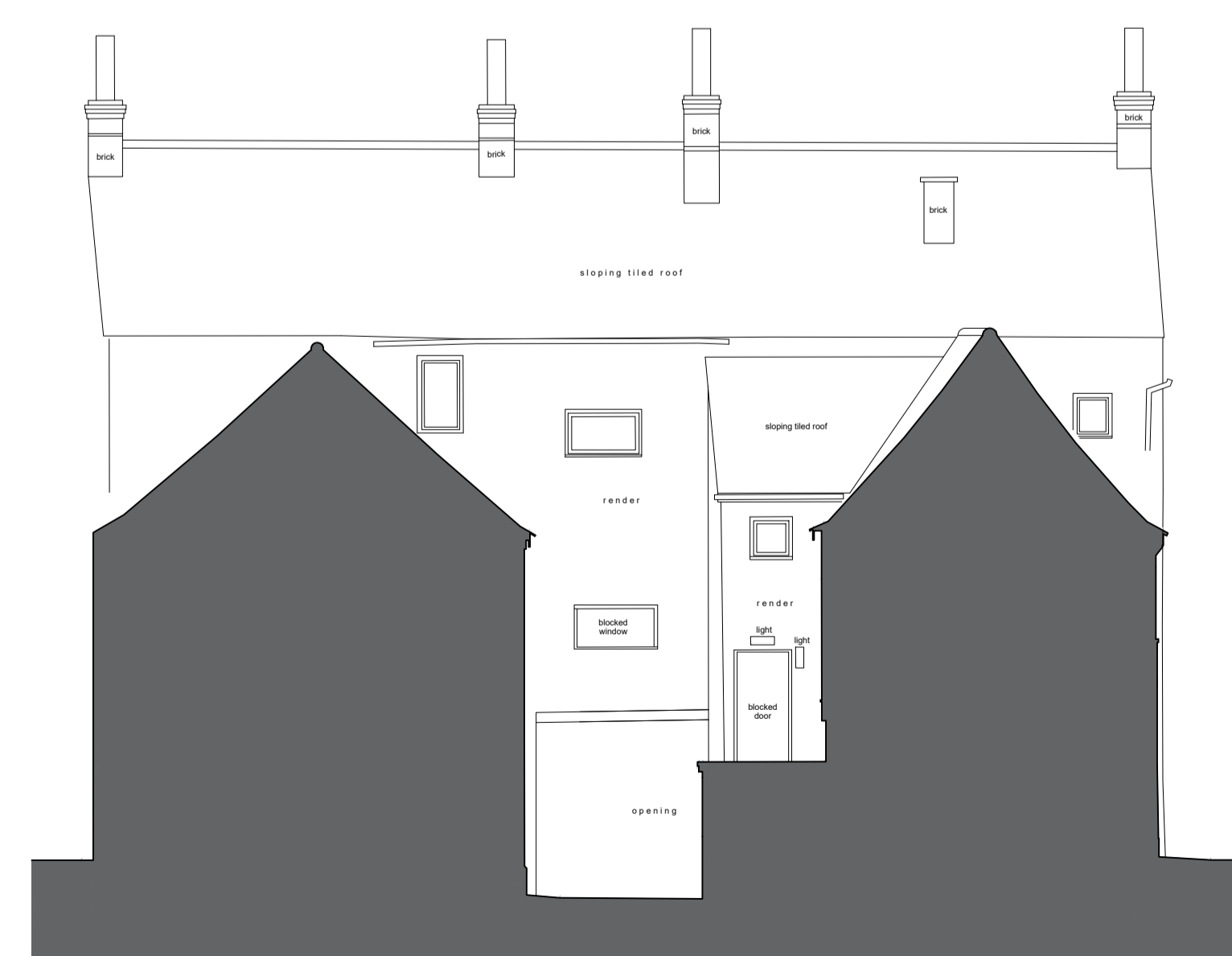
drawing title
Existing Elevations - Sheet 2

scale 1:100 size A1 drawn AH/JW date Sep 2024

drawing no. 24.012 - 3 - 031 rev B



ELEVATION 2 (MARKET SQUARE)



ELEVATION 13 (REAR ELEVATION)

Notes

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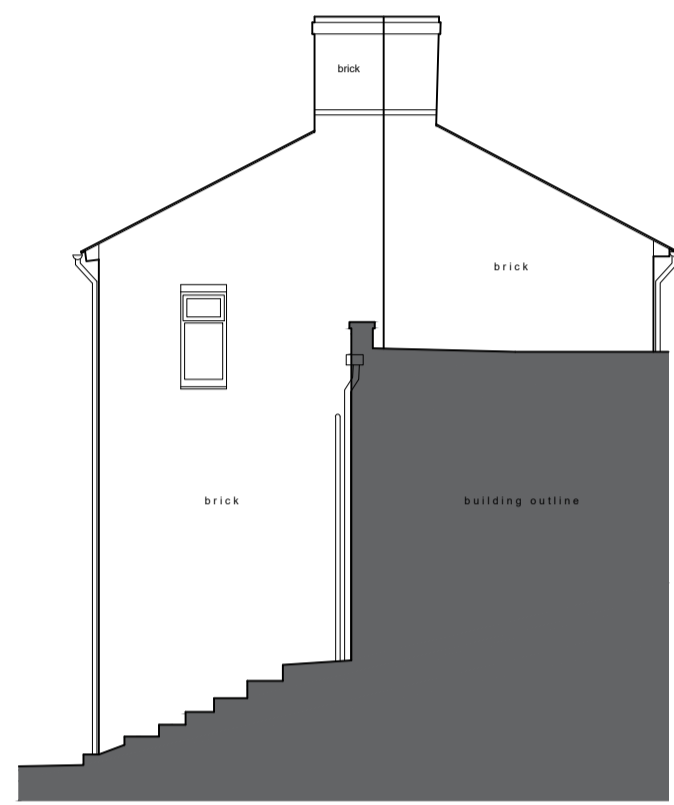
Shop drawings of manufactured items must be approved by the Architect before work is put in hand.

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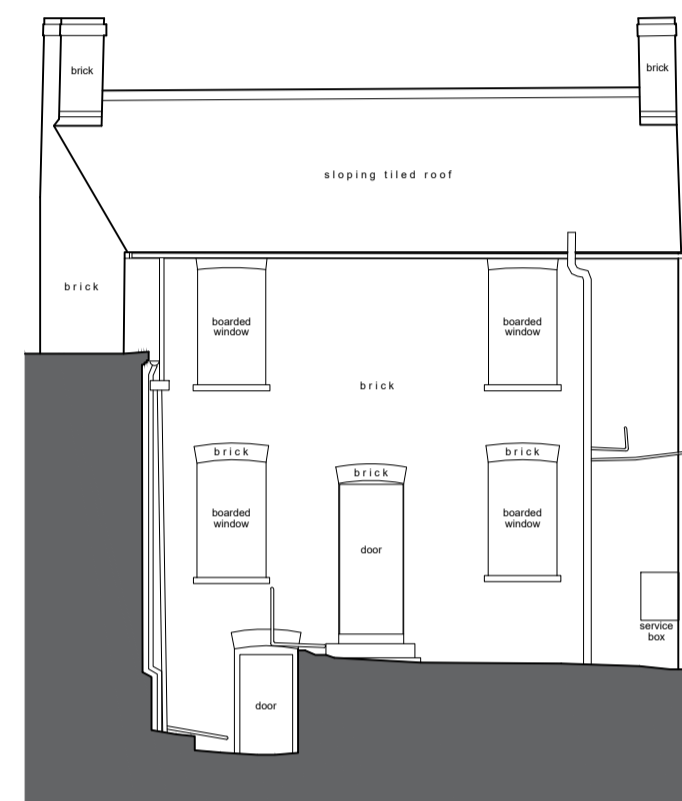
EXISTING

(BOATHOUSE SECTIONS & ELEVATIONS)

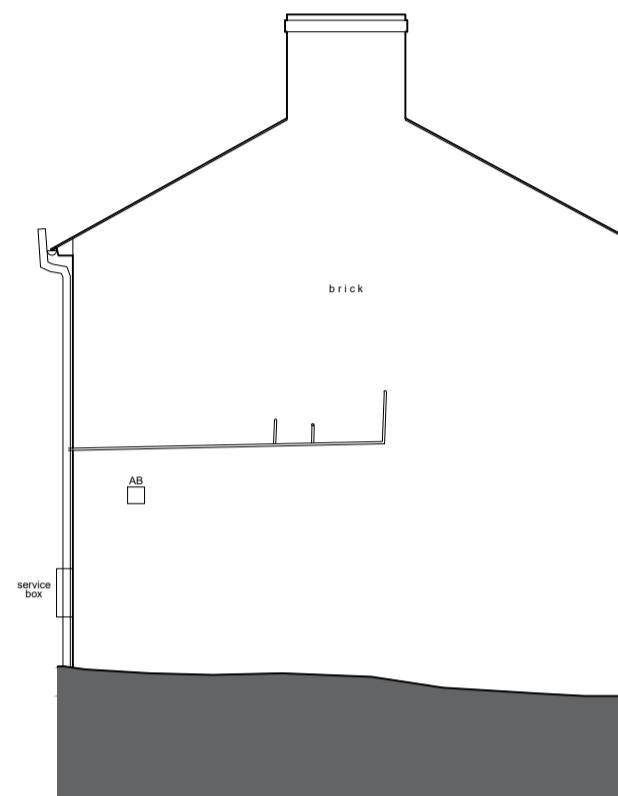
ELEVATION 7 (SOUTH)



ELEVATION 8 (EAST)



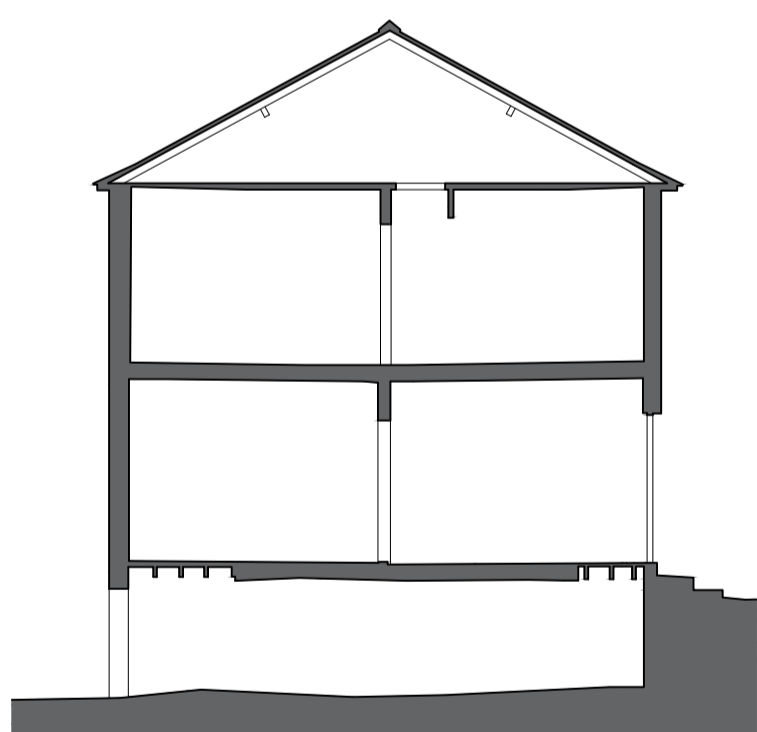
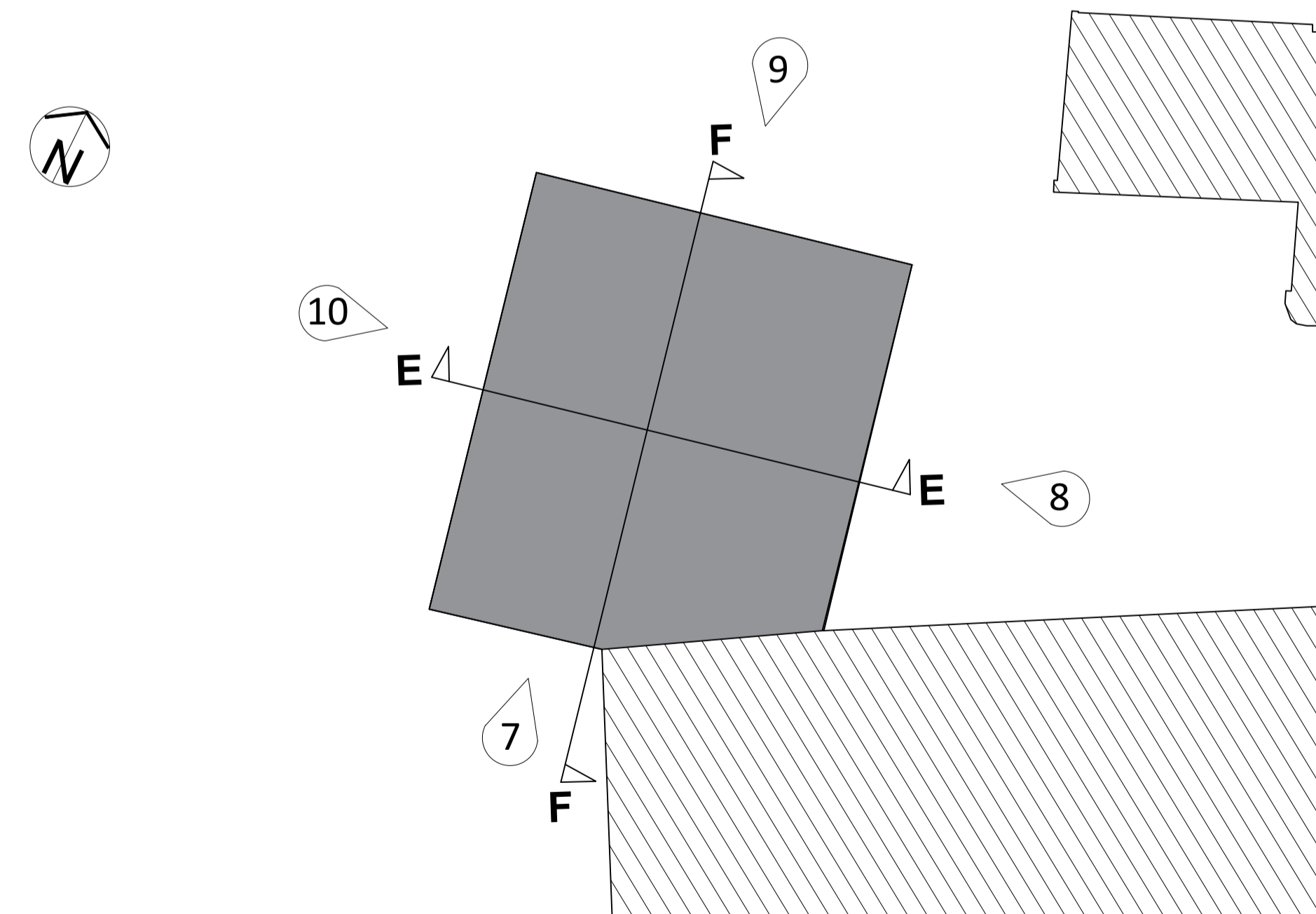
ELEVATION 9 (NORTH)



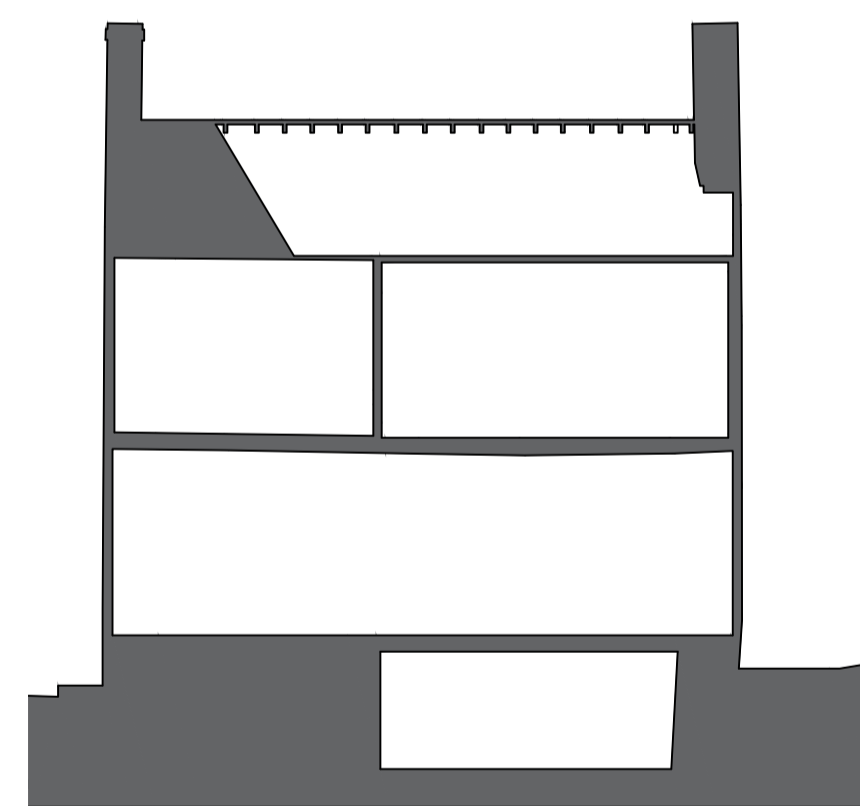
ELEVATION 10 (WEST)



OVERVIEW PLAN (BOATHOUSE)
SCALE: 1:100



SECTION E



SECTION F

A 30/09/2024 Planning Issue
revisions

SCALE 1:100 0 1 2 5m

PLANNING

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client
Huntingdonshire District Council &
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job title
Old Falcon Inn, St Neots
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Boathouse
Existing Elevations & Sections

scale	size	drawn	date
1:100	A1	AH/JW	Sep 24

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24.012 - 3 - 032	A