

DEVELOPMENT MANAGEMENT COMMITTEE 21st JULY 2025

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

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

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

Applicant: Homes England

Grid Ref: (E) 529919 (N) 272039

Date of Registration: 6th April 2023

Parish: Houghton and Wyton

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

OR

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

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

1. DESCRIPTION OF SITE AND APPLICATION

- 1.1 The Houghton Grange Field site which is located within the Parish of Houghton and Wyton comprises approximately 21.87ha of land situated to the eastern edge of the villages of Houghton and Wyton and to the west of the town of St Ives, located to the south of Houghton Road (A1123). The Thicket footpath is located to the south of the site, beyond which is the River Great Ouse floodplain and the settlement of Hemingford Abbots and Hemingford Grey. Part of the Thicket woodland was in the past gifted to the Council by the Biotechnology and Biological Sciences Research Council (BBSRC).
- 1.2 The Slepe Meadows housing development (Garner Drive) is located to the north whilst to the west is the residential Houghton Grange development phase 1 (being developed by Shelbourne Estates) and to the east is The How development and land formerly part of the golf course (which has been developed for residential purposes known as The Spires). The site has a main pedestrian and vehicular access from Houghton Road, opposite Garner Drive.
- 1.3 There are five listed buildings close to the site which include the Grade II listed Houghton Grange (Houghton Poultry Research Station); the Grade II listed Houghton Grange East and West Lodges (East Lodge to Houghton Poultry Research Station, West Lodge to Houghton Poultry Research Station); the Grade II listed The How and its curtilage listed Gate Lodge and the Grade II listed Houghton Bury.
- 1.4 The south-western part of the site is located within the Houghton and Wyton Conservation Area and the St Ives and Hemingfords Conservation Areas are located adjacent to the boundary of the site to the south and south-east respectively.
- 1.5 The Environment Agency flood maps confirm that the majority of the application site is located in Flood Zone 1, which indicates a low probability of flooding from rivers or the sea in any given year of less than 1 in 1000. There is a very small area at the southernmost tip of the application site which lies partially within Flood Zones 2 and 3, as shown on the updated 2025 Environment Agency maps. The very small proportion of the site within Flood Zone 3 is not material to the proposed development.

- 1.6 There are statutory ecological designations within the site; part of the application site (to the south of Houghton Grange) comprises a County Wildlife Site. The nearest Site of Special Scientific Interest is the Houghton Meadows SSSI, located to the south west of the site.
- 1.7 There are a number of trees around the edge of the site and a group within the centre which are subject to a Tree Preservation Order (TPO) (reference 015/91).
- 1.8 The topography of the site is such that the site generally falls gently from the north to the south towards the River Great Ouse floodplain. Ground levels are approximately 33m AOD in the north, falling to approximately 21-24m AOD across the majority of the area. In the south western part of the site, the ground levels reduce more steeply to approximately 9m AOD, and 7.8m AOD in the most southern point.
- 1.9 The Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document (SPD) confirms that the site is located within the 'Western Periphery' character area. The site is not located within any statutory landscape designations.
- 1.10 The application site forms part of the land allocated for residential development in the Local Plan to 2036 within allocation SI 1 'St Ives West'; referred to previously and within the Local Plan as the BBSRC Field Site. The land to the east of the application site comprises The How along with the former St Ives Golf Course, the latter of which has been developed by Barratt Homes as 'The Spires'. The southern part of the former Golf Course is a publicly accessible Strategic Green Space covering approximately 8.4 hectares known as Berman Park. Both the application site and land further to the east and west (Houghton Grange) form part of the Local Plan allocation.
- 1.11 The application has been made in outline form with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. Details relating to access, layout, scale, appearance and landscaping have been reserved for subsequent approval.
- 1.12 The final number of dwellings will be determined at the detailed design stage however it is anticipated that the site will achieve up to 120 dwellings. The development will be served from the existing access road (Edith Coote Drive) taken off the A1123 - Houghton Road (already constructed as this serves the adjacent Houghton Grange phase 1 site).

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

2. NATIONAL GUIDANCE

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

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

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

- 2.3 For full details visit the government website [National Guidance](#).

- 2.4 Relevant Legislation:

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

3. PLANNING POLICIES

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

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

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

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

3.3 Supplementary Planning Documents / other guidance:

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

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

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

Housing Land Supply

- 3.4 NPPF paragraph 78 requires the Council to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against our housing requirement. A substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements was introduced on 12th December 2024 in the revised NPPF and associated NPPG (the standard method).
- 3.5 As Huntingdonshire's Local Plan to 2036 is now over 5 years old it is necessary to demonstrate a five-year housing land supply (5YHLS) based on the housing requirement set using the standard method. NPPF paragraph 78 also requires provision of a buffer to ensure choice and competition in the market for land. As Huntingdonshire has successfully exceeded the requirements of the Housing Delivery Test a 5% buffer is required here. The five year housing land requirement including a 5% buffer is 5,501 homes. The current 5YHLS is 4,330 homes equivalent to 3.94 years' supply.
- 3.6 As a result of this, the presumption in favour of sustainable development is applied for decision-taking in accordance with paragraph 11 (d) and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as 'the tilted balance'. While no 5YHLS can be demonstrated the Local Plan policies concerned with the supply and location of housing as set out in the Development Strategy chapter (including policies LP2, LP7, LP8, LP9 and LP10) of

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

- 3.7 The Huntingdonshire Local Plan to 2036 confirms the strategic policies within the Plan (those which are essential to the delivery of the Local Plan strategy) includes the site allocations, and that Neighbourhood Plans must be prepared in general conformity with the strategic policies of the Local Plan. It is acknowledged that the Local Plan is more recent than the Neighbourhood Plan; therefore, the Local Plan takes precedence, as set out in paragraph 31 of the NPPF.
- 3.8 The application site is allocated under policy SI 1 'St Ives West' of Huntingdonshire's Local Plan to 2036. Allocation SI 1 stands as adopted in the Local Plan and is not considered to be out of date; policy SI1 is therefore afforded significant weight in the determination of this planning application.
- 3.9 The Houghton and Wyton Neighbourhood Plan (NP) was adopted in 2018. As the tilted balance is engaged a number of policies within the NP are given reduced weight in the determination of this application. In addition to the tilted balance being engaged, Policy HWNP1 is given no weight as it has been superseded by the site allocation SI 1 and Policy HWNP3 is given significantly reduced weight, noting the conflicts between this policy and allocation SI 1.

4. PLANNING HISTORY

- 4.1 As referred to at paragraph 1.2 and within the 'Principle of Development' section of this report, there are a number of planning permissions for the surrounding developments, as set out below.
- 4.2 The David Wilson Homes permissions (9801132OUT and 0900023REM) for residential development and reserved matters details for the erection of 128 dwellings; this development (forming Phase 1 of the Spires development) is now complete.
- 4.3 The Barratt Homes permissions (1301895OUT, 17/00589/REM, 17/02325/FUL and 19/01671/FUL) relate to the erection of 186 dwellings and change of use of part of the former golf course to a country park (Strategic Green Space); this development (forming part of the Spires development) is now complete.
- 4.4 Houghton Grange (phase 1) has in total 107 dwellings. This comprises of 5 dwellings within the converted listed Grange (20/01438/FUL), the refurbishment and extension of the two listed lodges (East and West) and 100 new builds on the site, including

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

- 4.5 Land associated with The How has permission (19/02280/FUL and 21/02079/S73) for the erection of 18 new dwellings and the refurbishment and extension of the curtilage listed Gate Lodge; this development is currently being built on site.
- 4.6 1301056OUT - Outline application for 224 dwellings and retail unit and associated roads, pathways, Public Open Space, and landscape – Withdrawn 08.09.2020.
- 4.7 21/70046/SCRE - EIA Screening Opinion – Response issued 24.03.2021 and is in the public domain. The response concludes that the Local Planning Authority opines the proposed development is not EIA development.

5. CONSULTATIONS

- 5.1 Houghton and Wyton Parish Council (H&W PC) (COMMENTS ATTACHED dated 28.06.2023) – recommends REFUSAL. The H&W PC objections are detailed in a letter prepared by Richard Buxton solicitors which raises the following summarised objections to the proposals:
 - That the development is contrary to the adopted Huntingdonshire Local Plan (in particular policies LP2, LP3, LP10, LP11, LP12 and site allocation policy SI 1);
 - That the development is contrary to policies of the Houghton Neighbourhood Plan (in particular policies HWNP1 and HWNP3); and
 - That the development is contrary to the NPPF paragraph 174.

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

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

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

- 5.3 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 28.02.2025) – recommends REFUSAL and includes an Update Review on the LVA “A review of the applicants revised LVA” prepared by Peter Radmall Associates, which states that there are a number of concerns that are considered to remain as unaddressed. Again, a detailed letter has been submitted by Richard Buxton solicitors on behalf of H&W PC raising concerns relating to the development being contrary with policies within the Local Plan, Neighbourhood Plan and the NPPF. The letter also raises concerns in relation to the density of the proposals and considers that the tone of the application takes no account of local considerations from the parish and neighbouring councils.
- 5.4 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 24.04.2025) – recommends REFUSAL noting that whilst welcoming the removal of the LEAP from the countryside separation gap, relocating this as an informal play area in the linear green space seems inadequate. They consider that a second LEAP should feature within the developable area, and that there is enough space if the number of homes were reduced. The PC consider that if the proposals were reduced in scale and remodelled then a MUGA or tennis courts could be provided to relieve capacity on the village playing field. Concerns have been reiterated in relation to the number of houses proposed within the village and the capacity of community infrastructure (when taking into account Houghton Grange phase 1 proposals), the density of development proposed and that the proposals would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area, as has been cited on a reason for refusal under application reference 24/02275/FUL¹. The PC consider that there is a more acceptable solution to the development of this site by reducing the amount of houses which would create more space for play and leisure facilities, thereby enhancing the perception of separation, complimenting Phase 1 and providing a more fitting density of housing for this countryside / small settlement location (all of which would then be consistent with the alternative proposal shared by the PC previously).
- 5.5 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 23.05.2025) – recommends REFUSAL, noting that LTP3 and the Houghton & Wyton Neighbourhood Plan Policies HWNP 12 and HWNP 13 all point towards refusing this application as it stands, and towards reconsidering it following a reduction to the

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

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

- 5.6 Houghton and Wyton Parish Council (COMMENTS ATTACHED dated 26.06.2025) – requests S106 agreement be secured which provides funds to improve the utilisation of existing parish land for sports and recreation provision, together with new land and infrastructure within the developed footprint of the Houghton Grange Phase II site to provide a new, flexible community sports and recreation facility.
- 5.7 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 28.06.2023) - recommends REFUSAL raising concerns relating to the layout and density of the buildings and elimination of the green entrance to St Ives; the development area size being larger than that shown in the current Local Plan vision of the area, thus impacting the green space and vista from the road; the number of dwellings proposed should be reduced and at or close to the minimum number within the permitted range (56 houses); and the design of houses should be similar to that in phase 1 of the development and not a smaller more cramped town

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

- 5.8 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 14.10.2024) recommends REFUSAL noting that members were unhappy about the brevity of the consultation period for town and parish council feedback. While noting the minor changes to the configuration of properties within the proposed plan, members felt that previous concerns about the number and density of properties being proposed had not been addressed, noting that the number of properties still exceeds HDC's requirements for the area and that the density of 28 properties per hectare far exceeds those for Houghton Grange phase 1 (16 properties per hectare) and it also exceeds that for the Spires development in St Ives (26 properties per hectare). SITC comments that there is no perceived justification for the high density of this application and concerns have also been raised in relation to the impact the development would have on local amenities, including schools. Comments were also made in relation to concerns that the developer had not specified the surface water drainage solution to be used at the site and that the more homes that are built on the site, the greater the flood risk from surface water could be.
- 5.9 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 13.03.2025) – comments received welcome the increased green space in the north side of the development, however it is noted that this is compensated by the play area being moved to the east side. It is also noted that councillors are looking for the impact to be minimal in terms of the open space between the development and St Ives.
- 5.10 St Ives Town Council (as adjacent Parish) (COMMENTS ATTACHED dated 15.05.2025) recommends REFUSAL stating that the Local Plan allocated 88 homes, plus or minus ten percent and that the application's plan exceeds this number; the Committee strongly feels that a figure of minus ten percent would be more appropriate for the area (79 homes). Comments note that Councillors shared local residents' views on the application, noting that many objections have been made by the public and that the Committee express concerns on grounds of overdevelopment and a significant strain on local infrastructure and resources. Traffic and congestion issues are also raised as a major concern for the Council and local residents, noting that the existing traffic figures

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

- 5.11 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 16.05.2023) recommends APPROVAL, noting that the proposals meet the Parish Council's concerns initially raised on impact from the development on Hemingford Grey.
- 5.12 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 15.10.2024) recommends REFUSAL, noting that the number of trees has reduced and the impact of the proposals on drainage, sewerage and traffic. The Council raises concerns about the increased traffic on the A1123, which is already over capacity and that the proposals would further degrade the buffer between Houghton and St Ives. Comments also state that the density of development is far higher than the surrounding area and would need significantly decreasing to be acceptable.
- 5.13 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 28.02.2025) recommends REFUSAL noting that the proposals represent overdevelopment of the site and that the development overrules the local plan for Houghton and Wyton, places too much strain on local services and roads, and destroys the historic nature of this village to becoming a suburb of St Ives. The PC note that they would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.
- 5.14 Hemingford Grey Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 22 April 2025) recommends REFUSAL and whilst reiterating previous comments from 28.02.2025, note that the amendments did not seem to be significantly different from previous submissions.
- 5.15 Hemingford Abbots Parish Council (HAPC) (as adjacent Parish) (COMMENTS ATTACHED dated 30.05.2023) recommends REFUSAL, noting that the development is not in accordance with HDC's Local Plan in relation to the scale and size of the application, with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC also raised concerns relating to the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal (they note that this is especially relevant to Hemingford

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

- 5.16 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 22.10.2024) recommends REFUSAL, noting that the unnecessarily short consultation period sets an unwelcome precedent, and does not promote support for local democracy. Comments provided state that the proposals contradict the local and relevant Neighbourhood Plans and that the high density proposed ignores the anti-coalescence policy. Concerns have also been raised in relation to the potential overflow of surface water into the river and it is requested that a full and proper assessment is made with respect to the capacity of the drainage and irrigation systems for the wider site, because much of the infrastructure in the surrounding area is potentially obsolescent and prone to failure.
- 5.17 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 05.03.2025) recommends REFUSAL – reiterates comments from 22.10.2024.
- 5.18 Hemingford Abbots Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 29 April 2025) recommends REFUSAL – reiterates comments from 30.05.2023.
- 5.19 Wyton on the Hill Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 25.06.2023) recommends REFUSAL, noting that they do not object to building on this land, but it needs to be proportionate and given proper attention which they consider this application does not. They note that the application has not followed the local plan and raise concerns relating to transport / traffic, flood risk and drainage issues, the integration of settlements, anti-coalescence and loss of valued landscapes.
- 5.20 Wyton on the Hill Parish Council (as adjacent Parish) (COMMENTS ATTACHED dated 14.10.2024) raises concerns relating to the amount of time given for comments. Requests further time to submit comments and in the meantime queries the size of the gap between Houghton and St Ives, the impact on flooding, and the impact of increased traffic.
- 5.21 Anglian Water – NO OBJECTIONS, noting that there will be available capacity for wastewater treatment at the St Ives Water Recycling Centre. Details of a scheme for an on-site drainage strategy and on-site foul water drainage works are requested to be secured by condition, along with a number of informatives.
- 5.22 Cambridgeshire County Council – Education: NO OBJECTIONS subject to securing S106 obligations in relation to Early Years, Primary Education and Libraries and Lifelong Learning.

- 5.23 Cambridgeshire County Council – Lead Local Flood Authority: NO OBJECTIONS in principle subject to the imposition of conditions.
- 5.24 Cambridgeshire County Council Transport Assessment team – Following receipt of additional information – NO OBJECTIONS subject to conditions relating to the installation of a MOVA at the site access signal-controlled junction with the A1123 and the provision and implementation of Residential Welcome Packs.
- 5.25 Cambridgeshire County Council Highways team – NO OBJECTIONS subject to conditions, noting that this is an outline application and the actual layout in the form of roads and buildings will be the subject of a reserved matters application.
- 5.26 Cambridgeshire Fire and Rescue – NO OBJECTIONS subject to provision being made for fire hydrants by S106 or condition.
- 5.27 Environment Agency – No comments received (officer note: the significant majority of the site is located within Flood Zone 1).
- 5.28 Natural England – Has provided standing advice, noting that consideration should be given to the recreational pressure impacts to sensitive Sites of Special Interest (SSSI) which could arise from residential development.
- 5.29 HDC Active Lifestyles – NO OBJECTIONS, noting that a development with 120 dwellings with an average household size of 2.19 would equate to a total average household size of 263 people; as a result requests an offsite contribution of £72,401.40 towards formal outdoor sports provision.
- 5.30 HDC Arboricultural Officer – NO OBJECTIONS, subject to conditions which include the submission of a Tree Survey (TS), Tree Protection Plan (TPP) and an Arboricultural Method Statement (AMS) as part of any future reserved matters submission.
- 5.31 HDC Conservation – Confirms that the impact of the development on the significance of the identified assets has been assessed appropriately. It is noted that there will be less than substantial harm to three designated heritage assets and substantial harm to a non designated heritage asset (medieval ridge and furrow). The officer concludes that in accordance with the NPPF the identified level of harm should be weighed against the public benefits of the proposals.
- 5.32 HDC Environmental Health (contamination) – Notes that the Phase 1 Site Investigation report indicates that the site requires further investigation, so a full “Phase 2” land contamination investigation is recommended which targets the former Leucosis

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

- 5.33 HDC Environmental Health (construction period) – Proposes a condition so that construction times and deliveries during the construction and clearance phases are restricted, so NO OBJECTIONS subject to conditions.
- 5.34 HDC Environmental Health (noise) – Notes that the importance of noise impact should be considered early in the design stage to avoid the reliance on alternative ventilation provision, but that with appropriate mitigation appropriate noise levels can be achieved, so NO OBJECTIONS subject to a condition.
- 5.35 HDC’s Landscape Consultant (Expert Landscape Consultancy, April 2024, November 2024 and June 2025) – NO OBJECTIONS and considers that the submitted LVA provides a fair assessment of the landscape and visual effects of the development.
- 5.36 HDC Urban Design Officer – NO OBJECTIONS, noting that the amended scheme is considered acceptable with the key design principles illustrated on the Parameter Plan, and quantum of development illustrated on the Illustrative Masterplan.
- 5.37 HDC Planning Policy Officer – NO OBJECTIONS, confirming that the information submitted appears to align well with the requirements of the allocation. It has been noted that the cumulative proposals of this scheme in conjunction with the permitted portions of the allocated site will achieve a housing number below that allocated when including the acceptable 10% tolerance set out in paragraph D.8, and that cumulatively it will achieve more green space than that required through the allocation and a substantial proportion of biodiversity net gain. The indicative layout illustrates housing being focussed in the northern part of the site and retaining a substantial band of green space between new homes and the western edge of The Spires development, in accordance with paragraph 11.9 of the Local Plan.
- 5.38 Historic England – No comments to make and advises to seek views of specialist conservation and archaeological advisors.
- 5.39 Cambridgeshire County Council Archaeology - Due to the limited results of archaeological works in the locality, there are NO OBJECTIONS or requirements.
- 5.40 Cambridgeshire County Council Definitive Maps team – NO OBJECTIONS subject to a condition, noting that Public Footpath

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

- 5.41 NHS – NO OBJECTIONS subject to securing a financial contribution towards the capital cost of delivering the additional primary care floorspace required to serve residents of the new development (towards refurbishment/ extension at the Spinney Surgery in St Ives). Based upon the population generated, for a development of 120 dwellings that would result in 276 people, this would amount to £119,074.00.
- 5.42 Police Designing Out Crime Officer – notes that whilst this is at an early stage of development it is important that security and crime prevention are considered and discussed at the earliest opportunity to ensure that the security of buildings, and the environment provide a safe place for residents and visitors and should be considered as an integral part of any initial design for proposed development's, it should incorporate the standards of "Secured by Design", to design out crime and reduce the opportunities for crime. Further comments are withheld until a reserved matters application is submitted.
- 5.43 Wildlife Trust - NO OBJECTIONS subject to conditions which include securing a LEMP, compliance with the submitted Ecological Impact Assessment and an update to the BNG metric (once the detailed layout of the development is known).

6. REPRESENTATIONS

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

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

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

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

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

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

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

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

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

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

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

7. ASSESSMENT

- 7.1 When determining planning applications, it is necessary to establish what weight should be given to each plan's policies in order to come to a decision. The following legislation, government policy and guidance outline how this should be done.
- 7.2 The development plan is defined in Section 38(3)(b) of the 2004 Act as *"the development plan documents (taken as a whole) that have been adopted or approved in that area"*.
- 7.3 As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6); reiterated within the NPPF (2024) at paragraph 2) *"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"*.
- 7.4 The Town and Country Planning Act 1990 (Section 70(2)) states that *"In dealing with an application for planning permission or permission in principle the authority shall have regard to —*
(a) the provisions of the development plan, so far as material to the application,
(b) any local finance considerations, so far as material to the application, and
(c) any other material considerations."
- 7.5 In Huntingdonshire the Development Plan (relevant to this applications) consists of:
- Huntingdonshire's Local Plan to 2036 (2019)
 - Houghton and Wyton Neighbourhood Plan (2018)
 - Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
- 7.6 Within Guidance on Plan Making the PPG (Paragraph: 072 Reference ID: 61-072-20190315) states that *"The requirement to review local plans at least every 5 years, does not apply to neighbourhood plans. However, individual policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a plan that is adopted after the neighbourhood plan becomes part of the development plan. In these cases, the more recent policy takes precedence..."* In this instance, the Local Plan to 2036 was adopted after the Neighbourhood Plan. The position is also reiterated within PPG guidance on Neighbourhood Planning where paragraph 044 Reference ID: 41-044-20190509 states *"Should there be a conflict between a policy in a neighbourhood plan and a policy in a local*

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

- 7.7 The statutory term ‘material considerations’ has been broadly construed to include any consideration relevant in the circumstances which bears on the use or development of the land: *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor* [2011] EWHC 97 (Admin); [2011] 1 P. & C.R. 22, per Lindblom J. Whilst accepting that the NPPF does not change the statutory status of the Development Plan, paragraph 2 confirms that it is a material consideration and significant weight is given to this in determining applications.
- 7.8 The main issues to consider in the determination of this application are:
- Background information
 - Principle of Development
 - Landscape and Visual Impacts
 - Design and Character of Built form
 - Housing Mix
 - Impacts on Trees
 - Heritage Impacts
 - Highway Safety and Transport Impacts
 - Impacts to Residential Amenity
 - Biodiversity and Geodiversity
 - Drainage and Flood Risk
 - Land Contamination
 - S106 Considerations
 - Other Matters

BACKGROUND INFORMATION

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

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

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

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

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

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

- 7.10 Within the development guidance section of the Local Plan allocation SI 1, it notes at paragraph 11.3 that this *"is a complex site which contains a number of constraints and will require a sensitive approach to development"* and at paragraph 11.9 it sets out that *"Housing development should be predominantly situated in the northern part of the site and arranged in a series of clusters separated by green corridors running north-south through the site both to screen and separate areas of development and to connect through to the greenspace in the south of the site."*
- 7.11 Policy HWNP3 of the Houghton and Wyton Neighbourhood Plan is entitled 'Anti-coalescence'. This policy seeks to *"define and protect those areas of land responsible for delivering both the actual and perceived anti coalescence of village and town as experienced from road, footpaths, meadow or river"* (paragraph 5.14) and *"help to protect the special character of Houghton and Wyton which has a clear and distinct identity as a village from that of St Ives as a market town"* (paragraph 5.16). Within the justification to the policy it is recognised that this site occupies the only undeveloped frontage adjoining the A1123, which also runs south to the Thicket Wood.
- 7.12 Reflecting this policy on anti-coalescence, part g. of the site allocation SI1 requires *"a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network...and maintaining a sense of separation between developments at Houghton Grange and The Spires"*. In addition, the development guidance to SI 1 at paragraph 11.9 states that a

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

PRINCIPLE OF DEVELOPMENT

- 7.13 The presumption in favour of sustainable development is clearly outlined within the NPPF, with the goal of creating positive improvements in the quality of the built, natural and historic environment, which includes widening the choice of high-quality homes.
- 7.14 Policy LP1 of Huntingdonshire’s Local Plan to 2036 sets out the amount of development the Local Plan seeks to address having regard to the objectively assessed need for development in Huntingdonshire. The Strategy for Development at paragraph 4.4 of the Local Plan confirms that allocated sites are included to promote the deliverability of the strategy.
- 7.15 St Ives is classified in policies LP2 and LP7 as a Spatial Planning Area (SPA), as one of the district's traditional market towns and most sustainable centres. Collectively, LP2 anticipates that Huntingdonshire’s Spatial Planning Areas will deliver approximately three quarters of the objectively assessed need for housing and the majority of employment and retail growth will be focused in SPA’s.
- 7.16 As noted, the application site is included within the wider site allocated under St Ives West SI 1 ‘St Ives West’ of the adopted Local Plan to 2036. Allocation SI 1 relates to 54ha of land within the parishes of St Ives and Houghton and Wyton and allocates a mix of uses to comprise:
1. approximately 23ha of green space;
 2. approximately 400 homes; and
 3. social and community facilities to meet needs arising from the development.
- 7.17 The St Ives West Policy (SI 1) lists a number of requirements that successful development of the site will require which include:
- a. completion of a detailed master planning exercise to be agreed with the Council
 - b. design codes or conceptual appearance of development proposals
 - c. phasing of development, including the provision of green space
 - d. appropriate access via the Houghton Road/ Garner Drive junction and Knights Way

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

- 7.18 Allocation site SI 1 includes three other developments as well as this application site: The Spires to the east, The How to the east and south east, and Houghton Grange (phase 1) to the west.
- 7.19 As noted, the Local Plan allocation is supported by an indicative illustration which shows a form of development which could address the opportunities and constraints of the site, but this is indicative only and each application is to be assessed on its own merits against the policies in place.
- 7.20 In respect of assessing the application against the principles of Policy SI 1, part 1 criterion 1 of the site allocation states that approximately 23ha of green space should be provided. The current application proposal provides for 16.84 ha of green space and in combination with the green space at Berman Park and The How this amounts to 26.4 ha across the wider St Ives west site allocation, which exceeds the requirement for “*approximately 23ha of green space*” set out in part 1, criterion 1 of Policy SI 1; thus part 1 of the site allocation has been addressed.
- 7.21 In relation to part 1, criterion 2 of the SI 1 allocation, the planning history for the adjacent sites as listed at paragraphs 4.2 - 4.5 of this report sets out that consent has been granted for 305 new dwellings as part of St Ives West (noting there have also been some replacement dwellings for historic residential units on the Houghton Grange site).
- 7.22 A number of comments and concerns have been received relating to the quantum of dwellings and this application exceeding the Local Plan allocation. Policy SI 1 allocates “*approximately 400 dwellings*”. The introductory text to ‘Section D: Allocations’ in the Local Plan confirms at para. D.8 that there “*is scope for variation*”

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

- 7.23 In terms of the current application proposals for (up to) 120 dwellings, the total number of dwellings would fall within the 10% tolerance referred to in the Local Plan (it would bring the total number across the allocation to 425 which is less than 440 dwellings with the 10% tolerance), thus it is considered that the amount of development sought complies with part 1 criterion 2 of the SI 1 site allocation when the Local Plan wording around the allocations is applied.
- 7.24 In relation to part 1 criterion 3 of the SI 1 allocation, no social and community facilities have been provided directly on the wider allocated site or are proposed as part of the current application proposals. However, financial contributions have been secured by previous applications across the site allocation towards facilities and contributions are recommended to be secured pursuant to this current application, which include education, libraries, health and outdoor sports facilities.
- 7.25 In respect of the SI 1 (St Ives West) allocation criteria (a) – (l):
- a. It is acknowledged that no detailed master planning exercise has been completed for this site allocation. However, given the planning history to the site whereby consent was granted for the Barratt Homes scheme ahead of the adoption of the Local Plan, and given the planning history to the Houghton Grange phase 1 site which also had outline consent ahead of the Local Plan adoption, there has not been a chance to undertake a master planning exercise. The current planning application is the final element of the site allocation to come forward, thus it is too late to undertake detailed master planning at this stage. The current proposals do take into account the developments that have been granted planning permission to date and the submitted parameter plan ensures that links into these have been fully considered and will be secured (final details to be considered at reserved matters stage, if outline consent is granted). The lack of a masterplan for the whole site does not prevent comprehensive and appropriate development of the site, especially when the Local Plan is supported by an indicative illustration designed to guide development in the same way as a masterplan and give an overall vision and comprehensive indication of the intention for development of the site in a holistic manner, despite the submission of separate applications. This has allowed planning decisions to be guided by not only the policies, but also the overall illustrative vision for the site.

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

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

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

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

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

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

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

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

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

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

LANDSCAPE AND VISUAL IMPACTS

- 7.32 The application site is located on a ridge of higher ground to the north of the River Great Ouse; the north western corner of the site is the highest point at approximately 35m AOD and the northern half is broadly flat. A belt of trees extends from the eastern boundary, towards the centre of the site, and from here the land falls southwards towards St Ives Thicket and the Ouse Valley Way long distance path, with the Great Ouse flood plain beyond (approximately 20m AOD). The boundaries of the site are largely lined by mature shrubs and trees and the site contains significant trees of different species covered by Tree Preservation Order 015/91; these are of importance to the site and contribute to the wider landscape.
- 7.33 The land is predominantly pasture, surrounding two discrete areas of hardstanding. Large-scale institutional, agricultural and industrial buildings (Houghton Poultry Research Station) have been demolished on the site in recent years.
- 7.34 There are a number of Development Plan policies relevant to landscape and visual matters which seek to ensure that developments respond to their context and contribute positive to an areas character and identity. These are Policies LP2, LP3, LP11, LP12 and LP31 of Huntingdonshire's Local Plan to 2036 and Policies HWP3 and HWNP17 of Houghton and Wyton's Neighbourhood Plan.

The Huntingdonshire Landscape and Townscape Assessment SPD

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

Local Nature Recovery Strategy and the Nature Recovery Network for Huntingdonshire

- 7.36 With the introduction of the Biodiversity Net Gain (BNG) and Local Nature Recovery Strategy (LNRS) requirements into the Environment Act 2021, Huntingdonshire District Council's Biodiversity for All project commissioned a report by the Bedfordshire, Cambridgeshire and Northamptonshire (BCN) Wildlife Trust (September 2023), to aid the Council with its approach to these new areas of work. This report is called the Nature Recovery Network for Huntingdonshire (NRNH). The NRNH identifies evidence-led priority landscape areas for large-scale, strategic biodiversity and landscape enhancement in Huntingdonshire; this information informs the statutory Local Nature Recovery Strategy and wider place-shaping strategies and funding streams.
- 7.37 Local nature recovery strategies propose actions which are intended to help nature and improve the wider natural environment. The Local Nature Recovery Strategy is a County wide piece of work that is being developed by Cambridgeshire County Council who will be undertaking the work on behalf of the Cambridgeshire and Peterborough Combined Authority. The report was formally recognised by HDC at a Cabinet meeting on 15th October 2024 and a Council meeting on 16th October 2024 where it was resolved, amongst other criteria *"to inform the response to and engagement with the development of the Local Nature Recovery Strategy and subsequently future Planning Policy"*. Therefore, whilst not forming part of the adopted Development Plan this document represents a relevant material consideration in the determination of this planning application.
- 7.38 Within the NRNH 'Priority Landscapes of Huntingdonshire' are identified which include the Great Ouse Valley Priority Area (GOVPA). Whilst the GOVPA lies outside the application site, it is immediately adjacent on its southern boundary. It should be noted that the recognition of Huntingdonshire's Priority Natural Landscapes is not designed to inhibit the development and growth of the district, but support it by complementing the vision of the Huntingdonshire Futures strategy.

Landscape and Visual Appraisal

- 7.39 The application is supported by a Landscape and Visual Appraisal (LVA), which has been updated during consideration of the proposals and provides an assessment of the likely landscape and visual effects resulting from the proposals:
- Landscape effects relate to changes to the landscape as a resource, including physical changes to the fabric or individual

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comments received in respect of landscaping matters

- 7.49 Concerns have been raised by members of the public and by the Town and Parish Councils that the proposed development would significantly harm the landscape of the Great River Ouse valley. However, it is noted that the Ouse Valley is not currently subject to any statutory landscape designation.
- 7.50 H&W PC have submitted four landscape & visual consultant reports during the consideration of the application as part of their formal comments, as follows: (i) a Review of the Applicant's Landscape and Visual Appraisal dated June 2023, (ii) Implications for Separation between Houghton and St Ives dated June 2023; (iii) a Review of the Applicants revised LVA dated October 2024; and (iv) a Review of January 2025 Landscape and Visual Appraisal dated February 2025. These reports are enclosed with this DMC report as part of H&W PC's comments on the proposals.
- 7.51 The H&W PC report titled 'Implications for separation between Houghton and St Ives' (June 2023) concludes that despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds). This report also notes that the openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St Ives to the north and the vegetated frontages to Houghton Grange and The Spires, and that it is also seen in views from the southern part of the site.
- 7.52 The report states that whilst built development would occupy only approximately 22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road; as a result the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open

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

- 7.53 The June 2023 report also notes that the resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins, which is contrary to the Neighbourhood Plan HWNP3, as well as that the application proposals are at variance with the principles illustrated in Local Plan Policy SI 1, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint. The H&W PC report also states that the development would encroach into open countryside and have a further urbanising influence on the locality, contrary to the Neighbourhood Plan HWNP1, Local Plan policy LP10 and the NPPF 174(b). The report concludes that the Parish Council's concerns about the implications for coalescence and further urbanisation are therefore considered to be justified.
- 7.54 Comments received from H&W PC on 22 October 2024 included a report prepared by Mr Peter Radmall titled 'Review of Applicant's Revised LVA, October 2024' where it was stated that four concerns remained, including:
- The value of the landscape, particularly with relevance to local conservation areas and the highly sensitive Great Ouse Valley, may have been under-stated;
 - The LVA's focus on published character areas has been at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
 - There are unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the village and St Ives has not been recognised.
- 7.55 This October 2024 report concludes that as a result the LVA may have understated some of the predicted effects, including the degree to which the development would increase the actual and perceived sense of coalescence between Houghton and Wyton and St Ives.
- 7.56 Alongside comments received from H&W PC on 28 February 2025 was a further document 'Review of January 2025 Landscape and Visual Appraisal (LVA), February 2025' which states that the most significant change to the parameter plan occurs in the character of

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.67 The Executive Summary provides that (as relevant):

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

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

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

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

Landscape and Visual Impact Conclusions

- 7.68 As established above, a number of documents have been considered as part of the assessment of this application in respect of landscape and visual impact matters. Whilst the objections from H&W PC are noted, taking into account the comments received from Expert Landscape Consultancy, officers consider the submitted LVA is acceptable and that the landscape and visual effects of the proposals do not represent a reason to refuse the application.
- 7.69 The St Ives West (SI 1) allocation requires that a sense of separation is maintained between developments at Houghton Grange and The Spires. As detailed within the Design and Character section of the report below (see in particular paragraph 7.92) the separation gap varies in width and at its northern end it is approximately 145m wide. This sense of separation is important in maintaining an appreciation of the open landscape of the Great Ouse Valley to the south from Houghton Road and providing attractive access to it. It is considered that the sense of separation has been made more defined following receipt of amended plans. The officer's position is therefore that the application proposals will maintain a sense of separation between the developments at Houghton Grange and the Spires, in accordance with Policy SI 1 of the Local Plan
- 7.70 It is therefore concluded with regards to landscape and visual impacts that the proposals are acceptable and have considered the natural environment, respond to the context within which they are to sit and will create a sense of separation between the developments at Houghton Grange and The Spires. As such the proposals are considered to be in accordance with the NPPF 2024, policies LP3, LP12 and SI 1 of Huntingdonshire's Local Plan to 2036 and Policy HWNP17 of the Houghton and Wyton Neighbourhood Plan.

DESIGN AND CHARACTER OF BUILT FORM

- 7.71 The application site is located within the built up area of St Ives, and within the Western Periphery, as identified in the Landscape and Townscape SPD 2022. The site is largely open having been previously cleared of former buildings; it noticeably slopes down towards the south with a drop in ground levels.
- 7.72 It is noted that this application is in outline form and that future applications will be required with regards to the matters reserved; namely appearance, landscape, layout and scale. At this stage, however, consideration is to be had to whether the Parameter Plan and the indicative Illustrative Masterplan demonstrate an acceptable standard of design can be achieved within the development.
- 7.73 Following receipt of an amended Parameter Plan and Illustrative Masterplan, the HDC Urban Design Officer has raised no objections to the proposals. The officer considers that the submitted details have adequately demonstrated that the development can be accommodated in a satisfactory manner.
- 7.74 The Parameter Plan is detailed illustrating the background context, and key elements of the development for approval. The background context information on the plan includes the site constraints which encompass the water mains and foul water routes with their associated easements, the existing Houghton Grange Phase 1 masterplan and consented SUDs pond, vehicular access, existing and consented cycle and pedestrian routes and retained trees.
- 7.75 The Parameter Plan builds upon the identified site constraints with the developable area of the site for residential use, and seeks in-principle approval for a number of detailed elements which will inform future site layout including open spaces and trees, pedestrian and cycle routes, as well as building height and density.

Building heights

- 7.76 The scheme proposes development of up to 10m ridge height (from finished ground level) for the main part of the site, except for the perimeter edges around the south and east, and to the north along Houghton Road and the western parcel adjacent to Edith Coote Drive which are limited to 8.5m (from finished ground level) in height. The restriction of building height in these locations is intended to further reduce the impact and visibility of the proposed development when viewed from Houghton Road behind the proposed Houghton Road tree planting, and provide a softer interface with the wider open space to the south and east.
- 7.77 Development backing onto the tree belt along Houghton Road on phase 1 at Houghton Grange varies in height from 7.8m to

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

- 7.78 Along the Slepe Meadow estate frontage onto Houghton Road opposite the application site frontage, dwellings range in height from approximately 7.8m (plot 82 on the Garner Drive / Houghton Road junction), 8.1m (plot 85 on the Garner Drive / Houghton Road junction), to 9.2m (plot 77).
- 7.79 There is also variation in building height on The Spires phase 1 development close to Houghton Road including 3 storey apartments with a ridge height of 10.3m on Adams Drive, with other apartments on the development of 10.7m in height. Taller 2.5 storey dwellings are located as key buildings fronting key areas of public open space within the centre of the site. The three bespoke dwellings at the southern end of The Spires development (application 19/01671/FUL) fronting Berman Park have ridge heights of 7.8m.
- 7.80 The How development contains some larger 2.5 storey dwellings under a monopitch roof with ridge height of 8.5m.
- 7.81 Whilst storey heights have not been specified on the Parameter Plan it is likely that should 2.5 storey development be proposed at a future reserved matters application, that a second floor would be included within the roof space in order to meet the heights set out on the Parameter Plan. The maximum ridge heights proposed over the development are therefore considered acceptable within the context of the site.

Density

- 7.82 Local residents and Houghton and Wyton Parish Council, St Ives Town Council, Hemingford Grey Parish Council and Hemingford Abbots Parish Council have objected on the basis of density and overdevelopment of the site. However, officers consider that the proposed density of the development is in line with standard densities common in Market Town developments.
- 7.83 In addition, when considering the density of other developments in the immediate area (calculated with the inclusion of development roads but not public open space to ensure consistency), the average density of the Slepe Meadow estate to the north of Houghton Road is 39.4 dwellings per hectare (dph). The dwellings backing onto Houghton Road on phase 1 of Houghton Grange have an average density of 16 dph, with the average density of the development east of the Lime tree Avenue (73 plots) of 26.7 dph. It should be noted however that the site constraints of phase 1 Houghton Grange are unique with the existing landscape features, trees and listed buildings, which the development layout

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

- 7.84 The average density on phase 1 Knights Way (David Wilson Homes) at The Spires is 36.7 dph, with an average density on phase 2 (Barratt Homes) being 32.3 dph, with a total average of 34 dph at The Spires.
- 7.85 Whilst the detailed layout will fall to reserved matters stage, the submitted Parameter Plan and Illustrative Masterplan illustrate three areas within the site that would accommodate residential uses. A residential parcel is proposed to the north of Edith Coote Drive along the Houghton Road frontage, and then two parcels to the south of Edith Coote Drive, separated by a central linear area of public open space. These areas are to contain different densities and the Parameter Plan identifies that the northern part of the site adjacent to the access from Edith Coote Drive and adjacent to Houghton Road will have a density of no more than 23 dph. The Parameter Plan does not stipulate a maximum density for the remainder of the site, however based upon the number of dwellings shown on the Illustrative Masterplan on the two parcels to the south of Edith Coote Drive and their areas (excluding the central linear area of Public Open Space) and the density fix at the northern end of the site, the overall total based upon 120 dwellings would achieve an average density of 31.4 dph across the site.
- 7.86 It is noted that the two southern parcels are broken up by the central linear POS and whilst detailed layout matters would be agreed at reserved matters stage, the Illustrative Masterplan illustrates detached dwellings on the outer southern and eastern interface with the strategic green space, creating a soft interface and loose grain character.
- 7.87 The comments from Houghton and Wyton Parish Council are noted in relation to the recent Local Plan call for sites strategic land assessment criteria stating low densities of 25 dph are anticipated at edge of village locations. However the application site forms part of the existing SI 1 St Ives West allocation within the current adopted Local Plan and Local Plan Policy LP11 states that proposals will be supported where they respond positively to their context. The exercise which has been undertaken in relation to the density of adjacent developments is therefore important to note. In addition, the Local Plan call for sites assessment criteria considers densities of around 35 dph are appropriate in edge of town locations.
- 7.88 In considering the best use of land and the various uses and land requirements the development will need to accommodate, it is considered the proposal does not result in overdevelopment and reflects an appropriate density that has regard to the wider character and adjacent developments.

Trees

- 7.89 The Parameter Plan also seeks approval for the inclusion of various tree planted areas on the site. The Houghton Road frontage has two areas of tree planting proposed which will facilitate in reinstating the green backdrop to the site before the Houghton Road widening during 2011, and maintain and reinstate the green character along the southern side of Houghton Road. The tree belt to the west of the Houghton Road / Edith Coote Drive junction is proposed at depths ranging from approximately 17.4m to 21.3m. The tree planting area to the east of the Houghton Road / Edith Coote Drive junction is larger ranging in depth between approximately 40.6m to 63m and extends approximately some 85.6m to the east of the junction immediately south of Houghton Road. The proposed residential development is set behind these frontage tree areas creating a similar character of development set behind the tree and landscape character along the southern side of Houghton Road (Houghton Grange phase 1 to the west, and The Spires / Knights Way to the east), and in time views will be largely filtered from Houghton Road by the trees and landscaping.
- 7.90 Trees are also proposed along the eastern side of the site adjacent to plots 10-12 of The How, around the north eastern corner of the proposed SUDs pond, and a fourth area to the south of the proposed residential area and LEAP connecting the existing East -West tree belt on the eastern side of the site with the trees on the western side of the site.
- 7.91 A line of trees is also proposed around the outer southern and eastern perimeter edge of the residential development. Street trees within a highway verge are also proposed along both sides of Edith Coote Drive and a linear North – South row of trees are proposed within the centre of the site adjacent to the central area of public open space. Whilst the precise details of this planting will be detailed as part of the reserved matter applications, the inclusion of trees within the Parameter Plan is supported, with the proposed location of trees complementing the development and landscape setting of the site and wider landscape character of the area (noting the presence of trees within Houghton Grange phase 1, The How and The Spires).

Open space

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

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

- 7.93 Open space continues around the southern side of the development, incorporating a SUDs pond to the southeast between the existing East - West tree belt and the development. The SUDs pond has been illustrated as the maximum extent of water and is located within this area as the site topography falls towards the south. Details of the form of the SUDs pond and opportunities for its dual use with ecology and soft landscaping will be detailed at future reserved matters applications. The location of the SUDs pond in design terms is supported and provides the opportunity for enhanced landscaping along with ecology as a backdrop to the development and wider area of open space. Further details in relation to the SUDs pond are detailed within paragraph 7.252 of the report.
- 7.94 The Parameter Plan includes two areas for children's play. An informal play area such as a trim trail (to a standard of a Local Area of Play) is included within the central linear area of public open space (POS), and a Local Equipped Area for Play (LEAP) is located within the open space south of the development and central linear POS area. A LEAP has a minimum area of 400 square metres and comprises of informal recreation and varied, simulating and challenging play experiences. The locations of these spaces are considered acceptable, being close to proposed pedestrian routes through the site and encourage activity within the development and wider area of open space to the south. Details of the equipment as well as hard and soft landscaping for these play spaces will be considered via future reserved matters applications.
- 7.95 A North-South linear green space is also proposed with a pedestrian route and connections into Houghton Grange (phase 1) along the western edge of the site where an existing tree belt is located, ranging in width of 23m to 35m. A community garden / orchard is proposed as part of this wider area of green space to the north east.
- 7.96 Whilst the site layout and appearance are to be considered via future reserved matters applications, the submitted Illustrative Masterplan demonstrates development being outward facing and providing opportunities for natural surveillance over all areas of open space adjacent to and within the development area and could be achieved with the quantum of development sought.

Pedestrian and Cycle routes

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

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

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

Other design matters

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

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

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

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

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

Health Impact Assessment

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

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

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

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

HOUSING MIX

- 7.106 Policy LP25 requires that developments provide housing in accordance with the Cambridgeshire and West Suffolk 'Housing Needs of Specific Groups (2021)' that provides guidance on the mix of housing required to meet the needs of Huntingdonshire. This gives broad ranges reflecting the variety of properties within each bedroom category. This indicates a requirement for the following ranges needed; 0-10% 1 bedroom, 20-30% 2 bedroom, 40-50% 3 bedroom, 20-30% 4+ bedroom dwellings.
- 7.107 Policy HWNP16 of the Neighbourhood Plan relates to 'Windfall residential development' and states that windfall sites in the village that meets local needs will be supported. In particular, the provision of one or two bedroom units and housing that meets the needs of older people is particularly encouraged, and self-build units will be supported on appropriate sites. A number of neighbour comments and objections have also been received in relation to the need for smaller properties and to accommodate the needs of older people. Paragraph 11.8 of the Local Plan also notes that the H&W NP indicates a high level of demand for smaller properties and that development proposals should respond to this preference. Whilst the application proposals are not windfall development when considered against the Local Plan allocation (including supporting text), this policy should still be considered, noting the aspiration for smaller sized units in the parish as stated within the NP and within neighbour comments.
- 7.108 As the Local Plan is a later adopted document Policy LP25 takes precedence; whilst more weight should be given to Policy LP25 in relation to housing mix, given the wording at paragraph 11.7 of the Local Plan a level of smaller properties (in particular two bedroom units) will be discussed and agreed through reserved matters.
- 7.109 The submitted Design and Access Statement confirms that a mix of housing is proposed, to provide a variety of typologies. The Illustrative Masterplan shows the potential for three apartment blocks along the linear park, whilst semi-detached and detached houses are illustrated within the remaining part of the proposals. The housing mix includes a variety of unit sizes from two to five-bedroom houses, although the specific breakdown for these has not been provided by the applicant at this stage.
- 7.110 Detailed housing mix would be determined at reserved matters stage and controlled through condition, but based on the submitted illustrative masterplan on the whole the proposal appears to make a positive contribution in terms of its mix,

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

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

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

IMPACTS ON TREES

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

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

- 7.114 The exact details of the tree loss and pruning to trees would be confirmed at the reserved matters stage once the detailed design of the development has been progressed. It is proposed that tree loss will be mitigated with a robust and high-quality scheme of new tree planting, which represents an opportunity to increase the quality, impact, diversity and resilience of the local tree stock.
- 7.115 The HDC Tree officer has fully considered the submitted details and confirmed that the precise location of buildings and infrastructure should be considered in the context of the tree constraints. He has noted that the footprint of any new dwelling, hard surfaces, street furniture or over ground / underground services should avoid the Root Protection Area (RPA) of the retained trees, as well as being mindful of shading and future branch growth, not just of the buildings but of garden spaces too. This is particularly important along the western boundary of site, with the master plan showing a close relationship between retained trees and development. The Tree officer has noted that any REM application should be supported with a Tree Survey (TS) (to include any access facilitation works necessary for construction), a Tree Protection Plan (TPP) and an Arboricultural Method Statement (AMS).
- 7.116 The recent felling of trees and a hedge along the road frontage to facilitate the installation of underground services has also been raised by the officer, who wishes to see significant planting along the road frontage to provide screening and re-instate important habitat links with tree belts on either side of this development. The latest Parameter Plan for the application illustrates a foul water rising main and 3 m easement, but with frontage tree planting to the north of this along Houghton Road; further details of this planting will be secured at reserved matters stage.
- 7.117 It is therefore concluded with regards to the impacts upon protected trees that subject to conditions the scheme responds to the context within which it is to sit. As such the proposals are considered to be in accordance with Policy LP31 of Huntingdonshire's Local Plan to 2036 and policy HWNP17 of the Houghton and Wyton Neighbourhood Plan.

HERITAGE IMPACTS

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

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

- 7.119 The NPPF 2024 recognises the importance of preserving heritage assets and supports sustainable development. Paragraph 8 of the NPPF 2024 details the three objectives of sustainability. In relation to environmental matters, this confirms that this includes protecting our natural, built and historic environment.
- 7.120 Section 16 of the NPPF 2024 (paragraphs 202 to 221) sets out principles and policies for conserving and enhancing the historic environment. Paragraph 207 states that Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'. Paragraph 208 says *‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)’*. This paragraph also says that the significance of the heritage assets ‘should be taken into account’ when ‘considering the impact of a proposal on a heritage asset’.
- 7.121 Paragraph 212 of the NPPF 2024 advises that ‘great weight’ should be given to the conservation of designated heritage assets; and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm to, or loss of significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification (paragraph 213).
- 7.122 Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 7.123 Paragraph 216 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having

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

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

7.125 The Heritage Assets in the immediate location are:

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

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

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

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

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

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

Impacts on Designated Assets:

Houghton And Wyton Conservation Area

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

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

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

St Ives Conservation Area

- 7.133 The St Ives Conservation Area takes in the historic core of the town but also extends to the west in two strands separated by the eastern extent of the Thicket Road East and The Meadows character area of the Houghton and Wyton Conservation Area. The northernmost of these two strands incorporates St Ives Thicket, a belt of woodland to the north of Thicket Road which forms the southern boundary of the application site. The area of the application site to be developed as detailed on the Parameter Plan will be approximately 260m north of this point.
- 7.134 The land slopes gently up from the southern boundary of the application site with the conservation area (20m AOD) to the upper part of the application site (33m AOD). The majority of the application site will be screened from the conservation area by the natural landform but it is possible that buildings on the southern edge of the developed area will be visible from the boundary of the conservation area on the north edge of St Ives Thicket (see photomontages in LVA from viewpoint 5).

- 7.135 The other western strand of the conservation area is mainly located between the River Great Ouse and the disused railway line and the application site will be screened from it by St Ives Thicket and the woodland between Thicket Road and the river which is part of the Houghton and Wyton Conservation Area. The south-western extent of the application site is passed immediately to the south by Thicket Road which then continues along the southern boundary of the conservation area. However, this part of the application site will not be developed and those parts of the site that are to be developed are not passed by any other routes leading into the conservation area; the impression of the visitor of the setting of the conservation area on approaching it will not be altered as a result.
- 7.136 The setting of the conservation area to the north of St Ives Thicket will be changed by the application proposals which will introduce built development to part of the setting that was formerly agricultural. However, the distance of the proposals from the conservation area (adjacent to the southern boundary of the site), the fact that only part of the proposals will be visible and that it will take the place of the previous research buildings will mean that any harm caused to the conservation area will be less than substantial, at the lower end of that scale.

The Hemingfords Conservation Area

- 7.137 The Hemingfords Conservation Area is a large area located mainly to the south of the River Great Ouse. The southern boundary of the application site is approximately 200m north-west of the conservation area boundary. The area of the application site to be developed is approximately 400m north of the conservation area which is screened from the site in this location by a belt of woodland either side of Thicket Lane approximately 200m deep.
- 7.138 The setting of the conservation area is the valley of the River Great Ouse including its floodplain and the wooded valley side to the south of the application site. The application site does not form part of this setting. The application proposals are not passed by any routes leading into the conservation area and the impression of the visitor of the setting approaching the conservation area will not be altered as a result. Within the south-west field of the application site, the spire of St Margaret's Church in Hemingford Abbots is visible. While there is intervisibility between the Spire and the south-west section of the site, the proposals are not considered to alter the rural character of the conservation area. As there are no buildings proposed for the south-west field of the site, this would also not affect the views to the church. The application proposals would not alter the special character of the conservation area. Thus there will be no changes to the setting of the conservation area as a result of the proposals and therefore no resulting impact or harm.

Impacts on nearby Listed Buildings and their Settings

Houghton Poultry Research Station (Houghton Grange):

- 7.139 Houghton Grange is located approximately 80m from the boundary of the application site but approximately 170m west of the area designated for development. The setting of Houghton Grange is its former park and gardens which includes the southwestern part of the application site that occupies the meadow that formed the southern part of the parkland. However, the area of the application site designated for development is confined to the north and northwest parts of the application site which was in agricultural use up to and after its partial development with buildings belonging to the former research station.
- 7.140 This listed building is well screened from the application site by the curving belt of trees to the east of the house that was part of the original planting scheme, by existing trees on the western boundary of the house's park, and by existing trees bordering the area to the east of that boundary formerly containing research buildings (now demolished) and now used for attenuation in Phase 1 of the Houghton Grange development.
- 7.141 The setting of Houghton Grange has changed as a result of the Houghton Grange Phase 1 development which has removed the modern wings to either side of the house, converted the house into five residential units and developed the area either side of the lime tree avenue that approaches the house. However, development on the application site will not result in further changes to Houghton Grange's setting. The house's relationship with the remaining elements of its park will be unchanged as a result. The remaining elements of the house's formal gardens to the south will be unchanged by the application proposals and the house's relationship with them will be preserved. Similarly, the important view over the valley of the River Great Ouse for which the house's location will have been chosen will be uninterrupted. There will therefore be no impact on the asset as a result of the application proposals and no resulting harm.

East Lodge and West Lodge to Houghton Poultry Research Station:

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

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

Houghton Bury:

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

Houghton Hill House:

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

The How:

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

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

- 7.146 The asset is reasonably well screened from the proposals by planting within its grounds; however the proposals will be apparent from the How access road, which runs through the belt of trees immediately to the east of the application site.
- 7.147 The presence of the proposals in the landscape will increase the area of built development to the west of St Ives, further changing the How's setting. However, the broad expanse of agricultural land to the west of this asset, which runs across the southern extent of the application site and on to the boundary of Houghton Bury approximately 700m away will remain unchanged. The asset's important views to the south across the valley of the River Great Ouse, which will have been the reason the house's location was chosen, will also be uninterrupted.
- 7.148 The application proposals will therefore change The How's setting by introducing further built development to the area to the north of the asset leading to some impact on the asset, but the asset's setting to the south and west and its important views to the south will be unaffected and this, along with the large area of the asset's grounds remaining, mean that the asset will continue to be appreciated as an early 20th century country house. The resulting harm will therefore be less than substantial, at the lower end of that scale.

Gate Lodge to The How:

- 7.149 The curtilage listed Gate Lodge to The How is located directly to the north-east of the application site. Modern houses have been built to the south-west of the Lodge, situated between the Lodge and the application site. There would likely still be some intervisibility with the site from the first floor of the Lodge.
- 7.150 The proposals will change the Gate Lodge's setting by introducing further built development to the area to the south-west of the asset, leading to some impact on the asset. The pedestrian cycle access connection to the south of the Gate Lodge may also result in increased movements along the approach road to The How, which would alter the building's setting. However, the addition of modern buildings to the south-west of the Lodge and the increased movements would not alter the Lodge's relationship with The How, or the existing avenue to the house. Thus, the harm caused would be less than substantial as neither the building, nor its relationship to the How, would be changed.
- 7.151 The submitted Heritage assessment does not specifically confirm at what end of the scale the less than substantial harm will be in respect of the Gate Lodge to the How, unlike the assessment does

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

Non-Designated Heritage Assets:

- 7.152 A number of non-designated heritage assets have been identified within the submitted cultural heritage assessment, which include Houghton Grange Park and Garden and Houghton Hill House and Garden. The submitted assessment concludes that there will be no resulting impact on or harm to these identified assets as a result of the application proposals.
- 7.153 In respect of ridge furrow, based upon previous archaeological evaluation, magnetometer survey and aerial photography it is highly likely that medieval ridge and furrow will be impacted by works associated with the proposals. This is considered to hold local significance based on its archaeological and historical interest; however, it is very degraded, with much of it already ploughed flat and only discernible via geophysical surveys. It is therefore of limited heritage value and it is noted that there are much better examples surviving as earthworks to the west and southwest, outside the application site.
- 7.154 In relation to previously unrecorded archaeological remains, the submitted statement notes that due to the low significance of the identified medieval ridge and furrow, and the high likelihood for any previously unidentified archaeological remains to have been heavily truncated by ridge and furrow, the County Archaeologist has determined any impacts from intrusive works associated with the construction of the application proposals to be negligible.

Conclusion:

- 7.155 The submitted assessment concludes that the application proposals will cause no harm to the Hemingfords Conservation Area and will cause less than substantial harm to the Houghton and Wyton Conservation Area through physical changes to the south-west field of the application site and to the St Ives Conservation Area through a change to its setting. However, it is concluded that the harm would be at the lower end of less than substantial.
- 7.156 Of the listed buildings within the 500m study area it is concluded that the proposals will have an impact on the Grade II listed The How and its curtilage listed Gate Lodge as a result of change to their settings, but that the resulting harm will be less than substantial at the lower end of that scale. The assessment concludes that the proposals will result in no impact on the two non-designated built heritage assets within the 500m study area; Houghton Grange Park and Garden and Houghton Hill House Park and Garden.

- 7.157 The proposals will result in physical impacts on the site and it will impact upon non-designated assets of local significance (very degraded medieval ridge and furrow). Whilst there would be substantial harm where it results in the truncation of these, it is noted that these assets are of local importance only and are only of low significance as they are very degraded and there are much better examples surviving as earthworks to the west (A34) and south-west (A35), outside the application site.
- 7.158 Historic England have not offered any comments; instead they have advised seeking the views of specialist conservation and archaeological advisers.
- 7.159 Cambridgeshire County Council Archaeology have confirmed that due to the limited results of archaeological works in the immediate vicinity, they have no objections or requirements for further archaeological investigations at the site.
- 7.160 The HDC Conservation officer has fully reviewed the proposals and considers that the submitted report makes a reasonable assessment of the impact of the development on the significance of the identified heritage assets, as set out above (noting that it is considered that the resulting harm will be less than substantial at the lower end of that scale in respect of the impact of the proposals on The How Gate Lodge, as set out in paragraph 7.151 above). The Conservation officer confirms that that a proportionate approach has been taken (the report focuses on the assessment of harm) that accords with the NPPF and is therefore acceptable.
- 7.161 The Conservation officer has noted that the application is for outline planning permission with all matters reserved and therefore consideration of the proposals are limited to the acceptability of the principle of development. Details such as roads, lighting, noise etc will be fully considered within any future reserved matters application. Therefore at such time as a reserved matters application is submitted, impacts on heritage assets from other aspects of the development, such as roads, lighting and noise can be fully considered and opportunities for mitigation can be identified, if required.
- 7.162 To conclude on the issues relating to the impacts of the proposals on three designated heritage assets, the development will constitute 'less than substantial harm' to these identified designated heritage assets and 'substantial harm' to a non-designated heritage asset (medieval ridge of furrow). In terms of the NPPF 2024, paragraph 212 directs that great weight should be given to the conservation of designated heritage assets "*irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*". Any harm to the significance of a designated heritage asset (including from development within its setting) should require clear

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

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

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

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

HIGHWAY SAFETY AND TRANSPORT IMPACTS

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

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

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

- 7.168 Policy LP16 of Huntingdonshire's Local Plan to 2036 encourages sustainable transport modes and LP17 supports proposals which incorporate appropriate space for vehicle movements, facilitates accessibility for service and emergency vehicles and incorporates adequate parking for vehicles and cycles.
- 7.169 The application is supported by a Transport Assessment (TA) and Framework Residential Travel Plan (FTP). The submitted TA states that access to the site will be via an existing signal-controlled junction on Houghton Road at its junction with Garner Drive. There is a staggered toucan crossing with dropped kerbs and tactile paving at the junction on the southern arm that will connect to the application site, providing safe east-west pedestrian and cycle accessibility along the southern side of Houghton Road. There are also staggered puffin crossings with dropped kerbs and tactile paving across Houghton Road, one each side of the junction, providing a safe route to Garner Drive and beyond to Thorndown Primary School.
- 7.170 To the north of the application site, along the A1123 Houghton Road, there is a shared footway and cycleway on the southern side of the carriageway between St Ivo Academy to the east and Houghton to the west. There is also a footway on the northern side of Houghton Road to provide access to an eastbound bus stop and connecting to crossing points. The A1123 is single carriageway that has a 30mph speed limit and has street lighting.
- 7.171 PRoW 132/8 is an existing footpath within the southern area of the application site that runs in an east-west direction for 276 metres from PRoW 132/10. PRoW 132/10 is a footpath to the south of the application site that runs in an east-west direction between Church Street and Meadow Lane (along the Thicket).
- 7.172 A pair of bus stops are located in the immediate vicinity of the application site along the A1123 Houghton Road. These serve eastbound and westbound services and both are within 50m of the junction. Both stops (which are served by Stagecoach bus routes B and C) have shelters with seating, timetable information and real time service information. The bus services link to the Guided Busway, which provides a fast and frequent public transport link connecting Huntingdon, St Ives and Cambridge.
- 7.173 With regard to road safety, the submitted TA confirms that collision data for the surrounding highway network has been obtained from Cambridgeshire County Council. This data confirms that there have been two collisions in 5 years, however this is not considered to represent a cluster, and this, in conjunction with the low severity of the incidents recorded, suggests there are no existing safety

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

- 7.174 Multi-modal trip generation of the development has been assessed using trip rates obtained from TRICS and the modal split has been identified using 2011 Census journey to work data. The proposed development has been calculated to generate 117 two-way trips during the morning peak hour 8-9am (26 in and 91 out trips) and 101 two-way trips during the evening peak hour 5-6pm (69 in and 32 out trips). The submitted TA states that more than half of the development trips (54.6%) are predicted to travel east on Houghton Road towards St Ives while just less than a quarter (24.0%) are predicted to travel west on Houghton Road towards Huntingdon. Some trips are assigned to Sawtry Way for accessing the A1 in the North (16.9%) and both Hill Rise and High Leys generate some trips for those accessing employment locations (3.6% and 0.9% respectively).
- 7.175 Capacity assessments have been undertaken at three junctions on Houghton Road including the site access, the Hill Rise/ High Leys junction and the junction with Sawtry Way. The results of surveys indicate that the Houghton Road/ Garner Drive/Houghton Grange site access junction currently operates within the desirable maximum during both peak hours and that the Houghton Road/Hill Rise/ High Leys junction operates below maximum desirable in both peaks. In respect of the Houghton Road/Sawtry Way junction, the results indicated that the A1123 Houghton Road / Sawtry Way junction currently operates within capacity with minimal queuing.
- 7.176 The highway modelling results within the submitted TA compares the 2028 and 2033 future operation of key local junctions, allowing for general background growth and committed development, together with full occupation of the proposed development.
- 7.177 The Houghton Road/Garner Drive/Houghton Grange site access junction is forecast to be operating with a negative practical reserve capacity (PRC) by 2033 without the proposed development. With the addition of the proposals the PRC reduces by 1.0% in the AM peak and 1.6% in the PM peak, with no significant changes in the mean maximum queue. Therefore, the TA concludes that the impact of the proposals on the operation of this junction is not significant. The Houghton Road/Hill Rise/ High Leys junction is forecast to operate marginally above the desirable maximum degree of saturation in the AM peak and below in the PM peak in 2033, without and with the proposals. The TA therefore concludes that the impact on the operation of the junction is considered to be negligible. The TA states that the proposal is forecast not to have a significant impact on the A1123 Houghton Road / Sawtry Way junction in 2033, operating below the desirable maximum ratio flow to capacity without and with the proposals. These results therefore indicate that, in general, the application

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

- 7.178 As noted, access will be taken from the southern arm of the existing signal-controlled junction that serves the Slepe Meadow housing development to the north of Houghton Road. As shown on the submitted Parameter Plan, once into the development, a network of connected routes will be provided to ensure that it is permeable to encourage walking and cycling and that for motor vehicles the site is easy to navigate (noting that the layout of any development would be considered at reserved matters stage). The submitted plans illustrate pedestrian routes to the southern boundary of the site adjacent to the HDC owned land along The Thicket. Within The Thicket HDC land are a series of footpaths that connect to The Thicket (PRoW 132/10). There is also a proposed footpath and cycle path to the east towards The How, which will link up to Knights Way.
- 7.179 The submitted Framework Residential Travel Plan sets out ways to reduce the use of private vehicles by residents, by promoting active travel and public transport facilities. A range of measures have been identified including promotion of the Travel Plan to actively engage residents in the process, measures and events to promote the benefits of active travel, measures to encourage cycling, and measures to encourage the use of local bus services.
- 7.180 Following receipt of additional information the County Council as Local Highway Authority (LHA) raise no objections, noting that the site is connected to an existing access road to the highway which has been previously approved and that this is an outline application. They have noted that the actual layout in the form of roads and buildings will be the subject of a future reserved matters application which they will be consulted on in due course. A number of conditions have been proposed by the LHA covering: full details of layout and siting, visibility splays, parking provision, turning and loading areas; details of the proposed management and maintenance of the proposed streets; binder course surface level before first occupation, temporary facilities clear of the public highway during construction and construction traffic routes.
- 7.181 The County Council Transport Assessment Team (TAT) have fully reviewed the submitted details and following receipt of additional information raise no objections to the proposals. Comments received note that updated LinSig models have been provided for the site access junction with the A1123 and the A1123 with Hill Rise; these have been reviewed by the signals team and are deemed sound. The models show that the site access junction is forecast to operate slightly over Practical Reserve Capacity (PRC) in all forecast scenarios during both peak hours, although it is not forecast to reach absolute capacity. The TAT comments conclude that the proposed development traffic makes the junction performance deteriorate slightly as reported in the transport

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

- 7.182 To note, a MOVA (microprocessor optimised vehicle actuation control) is a sophisticated strategy that uses microprocessors to assess the best signal timings given the physical layout of the junction, the signal stages available and the traffic conditions at the time. Once a MOVA site has been set up successfully, the system will generate its own signal timings cycle-by-cycle, varying continuously with traffic conditions, both in the short term (hour to hour, day to day) and in the long term following annual trends and longer term traffic growth. This means that the signal timings can vary widely as the traffic conditions change, which reduces delays.
- 7.183 The TAT has confirmed that there are no objections to the proposals subject to two conditions; the first relates to the installation of a MOVA at the site access signal controlled junction with the A1123, with full details to be submitted for approval (unless provided by Morris Homes in the meantime under S278 works). The TAT also propose a condition relating to the provision and implementation of a Residential Welcome Pack, that shall include suitable measures and incentives inclusive of bus vouchers and/or active travel vouchers to promote sustainable travel.
- 7.184 Officers note the recommended conditions by the Local Highway Authority and Transport Assessment Team and consider these are required to ensure the development is safe for its lifetime in highway terms and that the proposals deliver improvements necessary to ensure there is capacity for the development, and that sustainable travel is promoted.
- 7.185 The County Rights of Way Team have raised no objections to the proposals, noting that Public Footpath Number 8, Houghton and Wyton is located in the south-west section of the site and that the applicant should ensure that there is connectivity between this footpath and the proposed new public highways of the adjacent planning sites. A condition has been proposed to secure a Public Rights of Way scheme, which is considered to be necessary as it will improve connections.
- 7.186 Concerns have been raised from nearby residents and Parish/Town Councils in relation to congestion along the A1123 and impacts of the proposals upon the highway network.
- 7.187 In response to network capacity, as noted above the application has been accompanied by a Transport Assessment (TA) that, following further modelling and information, is supported by the County Council TAT as a technical consultee. It should also be noted that the Local Plan was supported by the Huntingdonshire Strategic Transport Assessment which included the development scenarios of the site allocations, including SI 1.

- 7.188 This is a sustainable and accessible location with good public transport provision and bus stops along Houghton Road. The development will include pedestrian and cycle links from the site, through the adjacent How development and into the Spires development and the wider link into the town secured as part of the Barratts development. There will also be a more direct link south towards the Thicket Path (although the topography of this section of the site is acknowledged), thus enhancing the options for journeys by foot and bike. The shared foot and cyclepath along Houghton Road is in good condition, connecting towards Huntingdon and Cambridge.
- 7.189 Having regard to the NPPF it is therefore not considered that the residual cumulative impacts of this development on the road network would be severe. Subject to adherence to the proposed conditions it is considered that adequate access could be provided for this residential development such that the proposed development would not be detrimental to highway safety. The proposal is therefore considered to comply with paragraph 115 of the NPPF 2024 and policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036.

IMPACTS TO RESIDENTIAL AMENITY:

- 7.190 The NPPF (2024), Policy LP14 of Huntingdonshire's Local Plan to 2036 and the Huntingdonshire Design Guide (2017) seek to protect the amenity of neighbouring occupiers and ensure a high standard of amenity for future occupiers of new developments.
- 7.191 The application is in outline form, and as such the detailed design will fall to future reserved matters applications. It is therefore not possible to be conclusive in relation to matters of overlooking, overbearing, or overshadowing impacts. The correct test at this stage with an outline planning application is whether it is reasonably likely the development could be accommodated without adverse impacts to neighbouring residential amenity.
- 7.192 Officers consider that, given the scale of the development and the separation from neighbouring property there is no reasonable basis to conclude an acceptable relationship cannot be accommodated with neighbouring off-site property in terms of overlooking, overshadowing or overbearing impacts. The development proposes uses that are largely reflective of typical residential locations, and as such there is not considered to be any basis to expect the development would give rise to noise or emissions that would otherwise impact surrounding amenity.
- 7.193 Whilst development of the application site would change the nature of outlook of some properties constructed on adjacent

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

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

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

Amenity And Health Of Future Occupants

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

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

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

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

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

- 7.200 In relation to internal noise conditions the submitted noise report confirms that the external façades of the proposed development will be designed to ensure provision of suitable internal noise conditions in accordance with BS 8233:2014. The report sets out glazing recommendations, which includes a high performance acoustic glazing for facades directly fronting onto Houghton Road, with standard thermal double glazing elsewhere on the site, to ensure that suitable internal noise conditions are achieved.
- 7.201 The submitted report explains that it is generally accepted that the sound reduction through a partially open window is 10-15 dB(A). Based on the noise levels measured, ventilation using partially open windows would be acceptable throughout the development site except for the proposed properties directly fronting onto Houghton Road, where ventilation will need to be provided by acoustically attenuated trickle vents.
- 7.202 To comply with Building Regulations (Part F) (Ref 16)14, it will be necessary to provide ventilation so occupants can ventilate their property without breaking the acoustic seal of the building envelope. Based on the predicted worst-case façade noise levels, acoustically attenuated trickle vents in the window frames are considered to be acceptable. It is noted that glazing and ventilation performance requirements will be refined and determined for all facades of the development buildings, which would be considered at reserved matters stage.
- 7.203 In relation to outdoor amenity areas (i.e. gardens) the report states that these should aim to achieve noise levels that do not exceed the 55dB LAeq,T threshold stated in BS 8233.
- 7.204 The report confirms that due to the proposed site layout, distance attenuation and acoustic screening provided by existing and future residences and the topography of the site, all outdoor private amenity areas (e.g. gardens) are expected to achieve noise criteria for external amenity spaces.
- 7.205 It is noted that operational noise limits for any fixed plant and building services plant have been recommended as to not adversely affect existing noise sensitive receptors. Consideration will therefore need to be given to the noise emitted by fixed plant and building services during detailed design stages (at reserved matters stage) so as to not adversely affect new residential properties in the development itself.

- 7.206 The HDC Environmental Health officer has fully reviewed the submitted details and confirmed that with appropriate mitigation, the required noise levels can be achieved.
- 7.207 The officer has however noted that with regard to BS8233, HDC require all properties to be designed to meet the standard within BS8233:2014, defined as an internal noise level of 30dBL_{AeqT} within bedrooms, 35dBL_{AeqT} in living rooms; and 45dBL_{AFmax} for individual noise events in bedrooms at night, as per the World Health Organisation (WHO). These should be achieved with windows partially open in order to ensure that residents do not have to keep their windows closed. Where this is not possible and developers rely on closed windows to achieve suitable internal noise levels, alternative ventilation may be considered by the LPA as a last resort. Full justification demonstrating consideration of alternative mitigation measures such as the design, distance, acoustic screening, orientation of buildings, locating additional windows on quieter facades and screening of sensitive rooms/areas by non-sensitive ones etc, is required to confirm the need for alternative ventilation has been minimised as far as practicable. Good acoustic design measures within ProPG Planning & Noise should be followed. Where alternative ventilation is required full details of the system will need to be supplied, demonstrating that it can achieve air changes comparable to an open window, therefore occupants of all habitable rooms will require a suitable ventilation system which achieves 2 - 4 air changes per hour. Trickle vents are considered to only provide background ventilation and would not be deemed sufficient to provide adequate ventilation for summer cooling. Other mitigation measures to enable internal guidelines to be met with windows open include acoustic plenum windows which may provide sufficient attenuation whilst allowing windows to be open, which could negate the need for alternative/mechanical ventilation in habitable rooms.
- 7.208 In respect of external noise levels, the Environmental Health officer has noted that as a mainly rural district HDC requires developers to aim for noise levels to not exceed 50dBL_{AeqT} in external amenity areas during the day. It is noted that guidance does provide an upper guideline value of 55dB L_{Aeq}, which it states would be acceptable in noisier environments, therefore HDC may accept this in more urban areas, as the maximum upper limit for sensitive external areas to be within. In this case, with the site being located in close proximity to a main A road and the town of St Ives, 55dB is likely to be considered acceptable externally during the day.
- 7.209 A noise related condition has therefore been requested by the officer, which is considered to be acceptable and necessary. Conditions have also been requested in respect of construction hours; to cover these matters, a CEMP condition is therefore proposed.

- 7.210 Noting the comments of the Environmental Health Officer, who has raised no objections subject to conditions, officers therefore consider the proposal would create a satisfactory noise environment for future occupants.
- 7.211 On the whole, and subject to conditions, officers consider the proposal has made adequate demonstration that a suitable amenity environment can be achieved for future occupants, and therefore accords with the NPPF and policy LP14 of the Huntingdonshire Local Plan to 2036.

BIODIVERSITY AND GEODIVERSITY:

- 7.212 Section 15 of the NPPF (2024) provides national planning policy on Conserving and enhancing the natural environment. Paragraph 187 of the NPPF (2024) states that *‘the planning system should contribute to and enhance the natural and local environment’* including by ‘protecting and enhancing sites of biodiversity value (in a manner commensurate with their statutory status or identified quality in the development plan); and *‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’.*
- 7.213 Paragraph 193 of the NPPF (2024) sets out principles to apply when determining planning applications, including:
- “(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then planning permission should be refused;*
- (b) development of land within or outside of a Site of Special Scientific Interest, and which is likely to have an effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.”*
- 7.214 LP30 of Huntingdonshire’s Local Plan to 2036 covers Biodiversity and Geodiversity. Its requirements include that proposals demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated; that a proposal likely to have an impact, either direct or indirect, on biodiversity or geodiversity will need to be accompanied by an appropriate appraisal; that adverse impacts are avoided, adequately mitigated, or as a last

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

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

Designated And Undesignated Sites:

- 7.216 The submitted Ecological Impact Assessment (EclA) confirms that due to the distance (greater than 5 km) separating the application site from the identified designated sites of international importance, there will be no direct impact (through habitat loss) on habitat and no fragmentation of habitats, or of populations of species using habitats within designated sites of international importance.
- 7.217 The application site is in close proximity to the Houghton Meadows Site of Special Scientific Interest (SSSI), which lies to the south west of the site. Natural England have raised the issue of residential development resulting in increased visitor / recreational pressure to the SSSI which has the potential to harm the important features that have led to its designation.
- 7.218 Whilst this concern is acknowledged, the Local Plan allocation for St Ives West seeks to provide approximately 23ha of 'Strategic Green Space' with the first phase (associated with the Barratt Homes / The Spires development) that has already been provided to the Council through the delivery of Berman Park. Additional land has also been secured through 'The How Strategic Green Space' as part of The How development. The current application proposals will result in the delivery of further strategic green space (which contributes to the overall 23ha green space requirement as set out within the Local Plan allocation). Therefore collectively this land will provide a large alternative area of green space which will aid in reducing and limiting potential visitor recreational pressures on the SSSI. Officers therefore consider the proposal is not likely to cause material harm to the SSSI.
- 7.219 There will be no direct impact (such as through habitat loss) on the Houghton Meadows SSSI as a result of construction of the proposals. There will be no fragmentation of habitats, or of populations of species using the SSSI, during construction. Boundary vegetation, such as hedgerows connecting the site to the SSSI will be retained, which will allow for connectivity for species using such features. There will be no disturbance to the SSSI or habitat degradation through construction of the proposals,

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

- 7.220 Part of the application site (to the south of Houghton Grange) comprises a County Wildlife Site (CWS). This has been designated as such as it supports at least 0.05ha of NVC community MG5 Crested Dog's-tail - Black Knapweed grassland.
- 7.221 All semi-improved neutral grassland present within the CWS will be retained. Security fencing will be erected to protect retained habitats from incursion during construction and there will be no direct loss of semi-improved neutral grassland. During construction, there is the potential that preparation of the site and construction of the proposals will result in dust and other pollutants (such as emissions from construction vehicles and oil-spills) which may impact grassland habitats within the CWS. However, the footprint of the proposals is around 150m from the CWS and the implementation of standard environmental protection measures will ensure that pollution during construction will not affect the integrity of retained grassland habitats.
- 7.222 Semi-improved neutral grassland across the site will be retained and there will be no species mortality of any species using this habitat during construction of the proposals. Following occupation of the dwellings, increased recreational pressure has the potential to cause habitat degradation through increased recreational use. However, the creation of significant green open space and footpaths within the site and other existing public open space within the vicinity will reduce any potential pressure (through increased recreational use) on the CWS and ensure that there is no damage or destruction on the interest features of the CWS.
- 7.223 The Wildlife Trust (as the LPA's Ecological consultant) has reviewed the submitted details and confirmed that the Ecological Impact Assessment (EclA) has been prepared in accordance with CIEEM guidelines and prepared to a high standard.
- 7.224 In respect of designated sites, the Wildlife Trust considers that the EclA has properly assessed impacts on internationally and nationally designated nature conservation sites, noting that the assessment correctly identifies that the only site likely to be adversely impacted by the development is Houghton Meadows SSSI. The impacts arise from an increased population and likely increase in numbers of visitors, particularly those walking dogs. However and as noted above, the application includes a significant area of new natural greenspaces which should be capable to

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

- 7.225 The Wildlife Trust suggests on-site signage to show circular walking routes, other destinations of interest, and to explain the sensitivities of nearby nature sites including Houghton Meadows SSSI and Houghton Grange Grassland CWS, which should be reinforced by the inclusion of information within all new residents' packs. This can therefore be addressed and secured at reserved matters stage.
- 7.226 In respect of un-designated sites and habitats, the Wildlife Trust notes that the application proposals avoid most impacts on habitats, although there will be removal of species-poor grassland, small areas of scrub, a few trees and a section of low value hedgerow. These are replaceable and the Biodiversity Net Gain Assessment report demonstrates how this will be achieved.
- 7.227 It is noted that the biggest impacts from the development will be on Houghton Grange Grassland County Wildlife Site, which is within the site boundary and identified as part of the new natural greenspaces to mitigate potential impacts on Houghton Meadows SSSI. While there are no significant direct impacts from the construction phase, there will be adverse impacts from the use of the site as natural greenspace by new residents. The Wildlife Trust suggest that a detailed grassland restoration plan should be included within a Landscape and Ecology Management Plan (LEMP), which should include a reduction in the area of scrub and restoration of areas of species-poor grassland to increase the native wildflower component. A LEMP will therefore be secured by condition.
- 7.228 With the imposition of conditions, it is therefore considered that impacts on designated and undesignated sites have been suitably addressed in accordance with Policy LP30 and paragraphs 187 and 193 of NPPF (2024).

Protected Species:

- 7.229 The Ecological Impact Assessment (EclA) submitted alongside the application confirms the proposals could affect a number of species which include Great Crested Newts, reptiles, breeding birds, bats and badgers.
- 7.230 In respect of Great Crested Newts (GCN), there are known populations to the west of the application site and to the east; the potential impacts to GCN as a result of the proposals are direct mortality and loss of terrestrial habitat. It is noted that the site is dominated by improved grassland which offers low value habitat for GCN, but the linear habitats (such as tree-lines and boundary

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

- 7.231 In relation to reptiles, the submitted EcIA confirms that the application proposals will lead to a small loss of habitat that is potentially suitable for transient reptile species, although the majority of habitat that offers suitable reptile habitat (such as the grassland, ditches) is retained within boundary features and is outside the footprint of the development proposals. It is noted that best practice construction methods will ensure vegetation clearance on site will be undertaken in a sensitive manner and at an appropriate time of year to ensure there is no species mortality to transient reptiles during construction. Therefore, through the retention of the majority of habitats on the site that could support reptiles and the mitigation measures outlined in the submitted EcIA, any transient reptiles on the site will be unaffected and there will be no adverse impacts on reptiles and no significant effects.
- 7.232 In respect of breeding birds the submitted EcIA notes that the construction of the proposals will lead to a small loss of habitat used by breeding bird species, although the majority of habitat supporting breeding birds is retained within boundary features and within scrub and trees outside of the footprint of the proposed built development. It is noted that best practice construction methods will include implementation of measures to minimise noise, lighting and vibration disturbance to breeding birds to ensure that, where construction of the proposals is undertaken within the bird breeding season (typically March to August inclusive), then disturbance to breeding birds in adjacent and retained habitats will be minimised.
- 7.233 The construction of the proposals, if undertaken within the bird breeding season (typically March to August inclusive), has the potential to cause mortality to breeding birds in habitats that are to be removed. Nesting bird checks will therefore need to be undertaken by an ornithologist prior to construction (where this occurs within the breeding season) to ensure there is no species mortality. Therefore, with mitigation in place, there will be no species mortality of any breeding bird species during construction of the proposals. Therefore, through the retention of the majority of habitats on site that support breeding birds and the mitigation

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

- 7.234 In relation to bats, the proposals will not impact upon any identified bat roosts; the buildings that were found to contain bat roosts in 2020 were demolished in 2021 and all boundary and on-site woodland/tree lines are being retained. If the footprint of the proposals result in any other features that are likely to be directly impacted (e.g. trees with moderate or high suitability) then further, more detailed bat roost surveys of trees will be required of specific features to inform mitigation and a EPSML (European Protected Species Mitigation Licence) application should one be required, in accordance with best practice guidance. Compliance with the submitted EclA can be secured by condition.
- 7.235 Effects from lighting have the potential to effect roosting bats within and close to the proposals and bats commuting to and from foraging areas during construction and operation. Some bat species are more sensitive to lighting and as the site is currently undeveloped and unoccupied, artificial lighting is minimal. Security and compound lighting is likely to be of a temporary nature and used only during the construction phase. Site activity will predominantly take place during daylight hours and is therefore not expected to cause significant disturbance to foraging or commuting bats. Security lighting where used during the construction phase is likely to be manually operated or on PIR (passive infrared) sensors and should not be on continuously, and given the rural nature of the site, it is unlikely that any security lighting would be often triggered. Therefore, through the retention of the majority of habitats on site that are of value to commuting and foraging bats, the retention and avoidance of roost sites; and the mitigation measures outlined in the submitted EclA, there will be no adverse impacts on roosting or commuting / foraging bats and no significant effects.
- 7.236 In relation to badgers, no setts would be lost to accommodate the proposals. The EclA confirms that standard best practice working methods will be implemented to minimise any risk of direct mortality to badgers. The design of the proposals, which includes the retention of the majority of habitats on site, strategic planting to shield the outlier sett from disturbance and other habitat creation, would ensure that there are no adverse impacts on badgers and no significant effects.
- 7.237 In relation to habitat impacts all woodland present within the site will be retained and measures embedded within the design to protect retained habitats during construction, including security fencing to protect from incursion. There will be no direct loss of woodland habitat. There will be no fragmentation of habitats, or of populations of species using woodland habitats, during construction. Boundary vegetation, such as hedgerows

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

- 7.238 As noted within the submitted EclA, during construction, there is the potential for dust and other pollutants (such as emissions from construction vehicles and oil-spills) which may impact woodland habitats. The implementation of standard environmental protection measures during construction will ensure pollution during construction will not affect the retained woodland. Where individual trees are removed (e.g. for access), the implementation of standard mitigation measures (such as nesting bird checks), will ensure there is no species mortality. Therefore, there are no impact pathways, either directly or indirectly, that would impact upon woodland habitats, resulting in no adverse impacts and no significant effects.
- 7.239 In respect of hedgerows there will be a loss of a small section of a defunct species-poor hedgerow during construction, to facilitate the construction of new footpaths. There is likely to be a temporary and short-term adverse effect on this habitat type, however, there will be replacement planting included elsewhere on site and therefore this effect is reversible. During construction, there is the potential that dust and other pollutants (such as emissions from construction vehicles and oil-spills) may impact hedgerows, but the implementation of standard environmental protection measures during construction will ensure pollution during construction will not affect the integrity of retained hedgerows. Furthermore, fencing the boundaries of working areas with appropriate standoffs, where required, will protect both above-ground vegetation and roots. The implementation of standard mitigation measures (such as nesting bird checks), will ensure there is no species mortality of any species using hedgerows during construction of the proposals. Enhancement of hedgerows (widening and strengthening through appropriate planting) would contribute to an overall net gain in this habitat type and over time would result in a beneficial impact.
- 7.240 In relation to protected species the Wildlife Trust have noted that the EclA considers the potential for impacts on a range of protected species and that detailed surveys have been undertaken for species groups that follow established best practice, though they are all now dated. The Wildlife Trust confirm that the surveys demonstrate the likely impacts arising from the development and identify appropriate mitigation measures for each group of species.
- 7.241 While the surveys are dated, the Wildlife Trust have noted that the low ecological value of the land within the development footprint and the minimal loss of habitats means that the potential impacts and mitigation measures that have been identified remain valid (as of early 2025). Some additional surveys will be required prior to

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

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

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

Biodiversity Net Gain (BNG):

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

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

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

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

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

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

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

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

DRAINAGE AND FLOOD RISK:

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

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

- 7.252 The FRA confirms that the area of the site in which hardstanding development is proposed is restricted to approximately 5 ha in the north-western most corner of the site. SuDS conveyance and storage systems have been proposed across the rest of the otherwise undeveloped site area including a proposed attenuation pond, with a capacity of 3,237 m³, together with a 4-8m wide swale. The report includes consideration of surface water sources, groundwater, sewer flooding and artificial sources to and from the site.
- 7.253 The FRA concludes that the site is not at risk of flooding from tidal and artificial sources, it is at low risk of fluvial flooding, there is a low risk of groundwater and low risk of sewer flooding, and the risk of surface water prior to mitigation varies across the site from low to high. In respect of mitigation measures, the primary mitigation required is the implementation of a suitable surface water drainage strategy to ensure that the risk of surface water is managed and there is no increase in sewer flooding risk as a result of the application proposals.
- 7.254 A surface water drainage scheme has been submitted which sets out how surface water will be attenuated on the site and discharged to the existing drainage ditch at a controlled rate (via the attenuation pond), so that the risk of surface water and sewer flooding to the site and surrounding areas is low.
- 7.255 The LLFA has fully reviewed the submitted documents and raises no objections to the proposals, noting that the submitted documents demonstrate that surface water from the proposed development can be managed and treated through the use of permeable paving, raingardens and green and brown roofing transferred via swales and attenuated with a detention basin with surface water discharge from site being restricted to greenfield equivalents. The LLFA have noted support for using such features for their ability to treat surface water before discharge into receiving waters. It has also been noted that the existing site has little to no surface water flood risk and that water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual. The LLFA have proposed a number of conditions if approval is granted, which include full details of the surface water drainage scheme, details of measures for water run-off during construction, and a survey to be completed once the drainage scheme has been completed. These conditions are all considered to be necessary and acceptable.
- 7.256 The Environment Agency has reviewed the application and offers no comments.

- 7.257 Anglian Water has confirmed that foul drainage from this development is within the catchment of St Ives Water Recycling Centre, which has available capacity for the flows. In terms of the used (foul) water network, Anglian Water state they will need to plan effectively for the proposed development and work with the applicants to ensure any infrastructure improvements are delivered in line with the development, given capacity constraints. Anglian Water request conditions relating to a phasing plan and/or an on-site drainage strategy, as well as a scheme for on-site foul water drainage works; these are all considered to be necessary and should be secured. A number of informatives have also been requested.
- 7.258 It is noted that local objections have been received on the basis that the proposal will lead to increased risk of flooding elsewhere. In response and as noted, the LLFA, Environment Agency and Anglian Water have raised no objections to the proposals subject to conditions.
- 7.259 On the whole, and subject to the conditions noted above, officers consider the proposed development is considered to be acceptable with regards to flood risk and drainage and is therefore compliant with the NPPF (2024), policies LP5 and LP6 of Huntingdonshire's Local Plan to 2036 and policy HWNP14 of Houghton and Wyton's Neighbourhood Plan (2018).

LAND CONTAMINATION:

- 7.260 The NPPF 2024 in paragraphs 196 to 201 refers to ground conditions and pollution. Paragraph 197 specifically refers to where sites are affected by contamination and states that the responsibility for securing safe development rests with the developer and/or landowner.
- 7.261 Huntingdonshire's Local Plan to 2036 policy LP37 sets out the Council's approach in relation to ground contamination and groundwater pollution. This requires investigation as to the risk and remediation where necessary.
- 7.262 The application is supported by a Phase 1 land contamination assessment which recommends further assessment and discussions with the Local Planning Authority be undertaken, given the history to the site.
- 7.263 The Council's Environmental Health Officer has fully reviewed the submitted assessment and considers that the site is suitable for the proposed use subject to conditions, including a phase 2 land contamination assessment. The officer has noted that the majority of the site is 'greenfield' with the exception of the former Leucosis Unit and that the site had Made Ground, but the extent has not

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

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

S106 CONSIDERATIONS:

- 7.265 The adopted Developer Contributions SPD 2011 (DCSPD) sets out the categories of contribution which the Council will seek to negotiate following the introduction of its Community Infrastructure Levy (CIL) Charging Schedule. Contributions vary according to the scale of residential development.
- 7.266 Whilst this application is for up to 120 dwellings, it is part of the wider St Ives West allocation. As such, this triggers the wider range of contributions appropriate to a large-scale major development. Policy LP4 sets out that where allocated sites are subdivided, contributions will be calculated on the complete developable area and apportioned appropriately.
- 7.267 Without prejudice to the eventual determination of the planning application, negotiations have been held with the Applicant in order to determine the extent of the obligations required to make the development acceptable. These negotiations have been held in line with the advice within the Regulations and the outcome is summarised below.
- 7.268 The Developer Contributions SPD sets out within part 2 that in determining infrastructure needs, the Council and partners have had to translate dwelling numbers into population generation. This has been undertaken utilising the anticipated change in average household sizes. For the purposes of calculating the likely infrastructure requirements, the 2016 average household size has been used (2.19 people per household). With the application seeking permission for up to 120 dwellings this equates to (120 x 2.19) 262.8 (rounded up to 263) people.

Community Infrastructure Levy (CIL)

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

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

Affordable Housing

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

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

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

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

Green Space

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

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

- 7.276 In accordance with the Developer Contributions SPD (based on a scheme of up to 120 dwellings) this development should provide 0.557 ha of informal green space on-site and due to the scale of the development formal green space can be negotiated.
- 7.277 The nature of the development results in a significant over provision of green space on the site. The scheme provides 17.66 ha of open space which is well in excess of the 0.557 ha area required by the Developer Contributions SPD for 120 dwellings. This open space will comprise amenity space, wildflower meadows, a linear park (comprising a LAP) and a children's play area (comprising a LEAP). The improvements to pedestrian connectivity to existing adjacent developments and the Thicket will also increase access for future residents.
- 7.278 Approximately 16.8 hectares of the strategic green space land is to be secured as an extension to the publicly accessible green space ("Berman Park") secured as part of the S106 package agreed for the Barratt development on the former golf course, which together with the space secured at The How development (part of the wider site allocation), creates one wider publicly accessible area.
- 7.279 The Developer Contributions SPD details a cascade mechanism for future management and maintenance of informal green space with the land first offered to the Town/Parish Council for adoption, then the District Council and then taken on by a Management Company. The usual cascade mechanism in the SPD is to be included in the Section 106 in order to secure the long-term management and maintenance of the areas of shared open space. A Landscape Maintenance contribution (using the updated costs for 2024/2025) will be secured through the S106 Agreement in the event that the open space is to be transferred to the District or Parish Council.
- 7.280 A similar cascade will be proposed in respect of the strategic green space land, but with this first being offered to the District Council, then Parish Council and then taken on by a management company. A Landscape Maintenance contribution will also be secured for the strategic green space land.

Outdoor Sports Provision

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

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

- 7.282 Part B.9 of the Developer Contributions SPD requires proposals to provide Outdoor sports provision on a negotiated basis. Paragraph B.31 of the SPD states that *“Large scale major developments may also require, in addition to provision of LEAPs/NEAPs, Multi-Use Games Areas (MUGAs) and wheeled sports areas. It is recognised that MUGAs and wheeled sports areas serve large areas of population and therefore the decision to request these facilities may vary depending on existing local facilities....These will be negotiated on a case-by-case basis.”*
- 7.283 The HDC Open Space Officer has previously advised that a LEAP/LAP should be provided in the play areas to cater for the children on this development (a LAP for the under 6 age group and a LEAP for children aged 6 and above). It is noted that no officer request has been made for a MUGA on site.
- 7.284 The HDC Strategic Sports Development Officer has requested an offsite contribution of £72,401,40 towards formal outdoor sports provision. The officer has noted that the Huntingdonshire Playing Pitch and Outdoor Sports Strategy (December 2022) outlines that facilities within Houghton require support to be able to increase sports provision in the area; the football pitches require additional maintenance, ancillary provision which supports Football, Cricket and Bowls has been identified as needing development and the tennis courts require sports lighting to increase its capacity.
- 7.285 The HDC Strategic Sports Development Officer has undertaken some initial discussions with Houghton and Wyton Parish Council to discuss potential formal outdoor sports provision projects which this contribution could support. A specific project can be identified in due course to support formal sports in the village, to enhance existing provision.
- 7.286 Whilst Houghton and Wyton Parish Council have requested a MUGA on site, the Huntingdonshire District Council Playing Pitch and Outdoor Sports Strategy Document (December 2022) does not identify a strategic need for a MUGA facility in either St Ives or Houghton and Wyton parish. There is already existing sports provision in the immediate area at St Ivo outdoor centre (located 700m to the north of the site) which comprises two tennis courts, a hockey pitch, a full sized floodlit astro pitch and several grass pitches. Within the development there is adequate space for informal activities to be played. The HDC Open Spaces officer has previously advised that a MUGA is not required and the HDC Strategic Sports Development Officer has not made a request for such.

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

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

Footpaths And Access

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

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

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

Health

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

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

- 7.294 CAPICS have confirmed that this contribution would be used towards refurbishment/ extensions to the Spinney Surgery in St Ives (or primary care-led facilities and associated infrastructure within the local Primary Care Network or successor body). Officers consider that whilst no specific healthcare project has been identified, services are provided for in the local area and is therefore considered sufficient to meet the needs of the development.
- 7.295 The Applicants have agreed to provide a financial contribution towards health services with the above request from the NHS Cambridgeshire and Peterborough Integrated Care System.
- 7.296 Officers consider this financial amount to be the requirement to mitigate the impacts of the development in terms of health provision and would be required in accordance with policy LP4 and section D of the Developer Contributions SPD.

Community Facilities

- 7.297 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part E of the SPD relates to the provision of community facilities (the SPD notes that these include such buildings as village halls, faith and cultural facilities).
- 7.298 The provision of social and community facilities is set out as being a requirement within the St Ives SI I allocation, however neither the Local Plan allocation nor supporting text sets out specifically what should be included. No direct provision of such facilities are proposed on site as part of the current application scheme and no specific community facility building has been identified as being required on-site. In extensive consultation with the Parish Council no identification of the need for community facilities has been made, nor any request received for improvements to any existing facilities.
- 7.299 No project has been identified for a contribution towards off-site community facilities in the area and therefore no contributions have been sought.

Libraries And Lifelong Learning

- 7.300 Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs and Part F of the SPD relates to the provision of library facilities.
- 7.301 The County Council have stated that there is insufficient capacity in St Ives town centre library. In order to mitigate the impact of the additional population, a project has been identified to modify the internal layout and allow for additional shelving units and

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

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

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

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

Education And Schools

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

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

Primary Education And Early Years:

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

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

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

- 7.310 The Council will meet the demand for early years places from this and other development by expanding capacity within the St Ives. The details of the specific project are not committed and therefore in accordance with latest Department for Education guidance it is appropriate to secure contributions based on the DFE Scorecard costs, which for the creation of new early years settings in Huntingdonshire is £21,757 per place (indexed from Q4 2023).
- 7.311 In order to mitigate the impact of the development on early years provision a contribution of £304,598 (14 x £21,757) is requested. As noted, the final amount would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.
- 7.312 Thorndown Primary School was expanded in anticipation of the St Ives West allocation; this project forward funded the expansion to provide an additional 1FE (210 spaces). The total cost of the project to expand Thorndown Primary School by an additional 1FE is £6,715,943 (based on 2014 cost with PWLB interest applied to 4Q2024). As set out above this development is expected to generate demand for 48 primary education places.
- 7.313 Therefore, a contribution of £1,535,073 is requested to mitigate the development impacts of 48 primary places. As noted, the final amount would need to be reflected as a calculation within any S106, to capture the final outcome of the number and form of dwellings which come forward as part of reserved matters applications.
- 7.314 The obligations are considered to meet the statutory tests and is compliant with policy and the SPD. The Applicants have agreed to provide a financial contribution towards Primary Education and Early Years in-line with the above request from Cambridgeshire County Council.

Secondary Education:

- 7.315 The County Council has confirmed that 30 Secondary School age children are forecast to be generated by this development.
- 7.316 The County Council have confirmed that there will be sufficient capacity at St Ivo School and therefore no contributions are sought in relation to this planning application.

Residential Wheeled Bins

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

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

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

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

S106 Summary

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

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

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

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

Other matters:

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

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

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

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

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

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

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

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

- 7.328 Policy LP3 states that proposals will be supported where it demonstrates compliance with a number of objectives. These include incorporation of open/.green space in accordance with the SPD; protecting and enhancing existing green infrastructure; and maintaining and enhancing the rights of way network.
- 7.329 The submitted Parameter Plan illustrates significant open and green space in excess of policy requirements and the existing PROW network is maintained. The application site is not within the Great Ouse Valley Landscape Character Area (although the southern boundary of the site is located adjacent) but the adjacent land to this is not proposed for any built development.
- 7.330 Paragraph 11.6 of the Local Plan specifically provides further supporting information relating to tree preservation orders, an early restoration of Houghton Grange County Wildlife Site and appropriate ecological assessments. Likewise paragraph 11.7 requires that proposals reinforce the strategic green corridor along the River Great Ouse by allowing the southern part of the site to comprise a substantial area of publicly accessible green space. The application proposals therefore incorporate previous building lines and trees, as well as levels and slopes, to maximise its contribution to the Ouse Valley Landscape Character Area. The application proposals are considered to provide a separation from the River Great Ouse that reinforce the green corridor and contribution to the Ouse Valley Landscape Character Area by

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

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

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

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

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

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

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

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

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

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

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

‘Development proposals should include:

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

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

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

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

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

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

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

7.341 Within the Planning Inspector's final report into the Local Plan (April 2019) on the examination of Huntingdonshire's Local Plan to 2036, it was acknowledged that the SI 1 site had a complex planning history, with a number of planning applications and planning permissions in place for elements of the development prior to the adoption of the Local Plan. The report also acknowledged that the allocation is important in sustaining the role of St Ives in line with the overall spatial strategy, noting that there

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

- 7.342 In addition, paragraph 188 of the Inspector's report specifically notes that *"..the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy."*
- 7.343 Huntingdonshire's Local Plan to 2036 includes at Section D: allocations paragraph D.8 that supports the approach towards to the supply of housing by allowing for a 10% tolerance either side of the approximate figure for allocations, noting that these capacities should be design-led. It can also be noted that paragraph D.8 sets out that where a scheme proposes a number outside of the variance it should be justified through the design and access statement, thereby supporting in principle a variation beyond the 10% tolerance.
- 7.344 The current application proposes up to 120 homes and taking the allocation in its entirety this amounts to 425 new homes across site allocation SI 1. This is within the 10% tolerance which would at its maximum total 440 homes. The current application proposals are considered to demonstrate a design-led approach to this capacity, which is in compliance with criteria g of the site allocation and by association paragraph 11.7 of Policy SI 1 which states that

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Housing numbers and density concerns:

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

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

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

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

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

Coalescence concerns:

- 7.359 H&W PC maintain that the proposals fail to grasp that the development is attached to Houghton Grange Phase 1 and is an extension of Houghton and Wyton village, rather than the town of St Ives itself, and that if approved without further amendments, the two distinctly different settlements will be linked. The PC also consider that the proposed development is still located too close to Houghton Road and that by infilling this land the proposal does not correspond with the Local Plan policy illustration, all of which increases the actual and perceived sense of coalescence, which would result in planning harm. Objections are also made in respect of the play area proposed within the 'gap/ green wedge'.
- 7.360 The Council's Landscape Consultant has concluded that the site is already perceived as being within St Ives (within the Western Periphery Character Area) and that the gap between St Ives and Houghton and Wyton is already experienced as the land between the Houghton Grange Phase 1 development, the most westerly part of the SI 1 Allocation, and the eastern edge of Houghton. This will not change as a result of the proposed development.
- 7.361 With regard to objections in respect of the play area proposed within the 'gap/ green wedge', this element of the proposals has since been removed from the latest Parameter Plan. As detailed earlier in this report, the latest Parameter Plan illustrates a gap that varies in width, which at its northern end is approximately 145m wide. This gap, alongside the development being set back from Houghton Road and lower building heights around the southern and eastern edges of the housing development area and along Houghton Road alongside significant tree planting, is considered to ensure that the sense of separation between the developments at Houghton Grange and The Spires is achieved, and the proposals accord with Policy SI 1.

Engagement concerns:

- 7.362 H&W PC state that they have sought to engage with HDC and Homes England in relation to an alternative proposal for the site, but that this has been rebuffed. Concerns have also been raised in relation to missing / out of date information submitted, inadequate levels of engagement, substantial amendments and resubmissions, nearly 270 documents and postings online and thousands of pounds of tax-payers' money being spent on professional help to support and ensure planning policies are adhered to and a positive outcome for all is achieved.
- 7.363 In response, amendments made to the proposals have included revised plans and details that have responded to both statutory and non-statutory consultee responses. In respect of the last (fifth) consultation this took place following the submission of an amended Transport Assessment; this consultation was undertaken as a number of comments have been raising concerns in respect of highways related matters (from both neighbours and PC's). Throughout the consideration of this application the additional information that has been received has all been placed onto the public file (noting some documents are large in file size so have needed to be broken down) with any superseded documents clearly labelled as such, so it is clear which are the amended documents and plans to review.
- 7.364 HDC have facilitated two meetings between H&W PC and Homes England (in February and July 2024), which have resulted in amended documents being submitted. Homes England have engaged with the local community since their initial community engagement on the proposals in the summer of 2018 and there has been extensive engagement with stakeholders, including Parish and Town Councils, both before and since the current planning application was submitted in April 2023. It is therefore considered that adequate levels of engagement have taken place in respect of these proposals and that officers have adopted an appropriately participative process which has allowed the Parish Council (including adjacent PC's) and local residents a full opportunity to comment on the proposals where amendments have been received.

Highways concerns:

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

Flooding concerns:

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

Request for a MUGA and car parking area:

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

Other decisions:

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

Conclusion:

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

CONCLUSION AND PLANNING BALANCE:

- 7.370 As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6)) determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Town and Country Planning Act 1990 (Section 70(2)) states that in dealing with planning applications the Local Planning Authority shall have regard to have provisions of the development plan, so far as material to the application, and to any other material considerations.
- 7.371 The NPPF (2024) is a material consideration carrying significant weight. A revised NPPF was published in December 2024, introducing a substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements. This has resulted in the Council being unable to demonstrate a five year housing land supply (5YHLS).
- 7.372 In those circumstances, the presumption in favour of sustainable development is applied for decision-taking in accordance with paragraph 11 (d) and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as 'the tilted balance'.
- 7.373 While no 5YHLS can be demonstrated the Local Plan policies concerned with the supply and location of housing as set out in the Development Strategy chapter (policies LP2, LP7, LP8, LP9 and LP10) of Huntingdonshire's Local Plan to 2036 are considered to be out-of-date and can no longer be afforded full weight in the determination of planning applications. Allocation Policy SI 1 can however still be afforded significant weight in the determination of this planning application.
- 7.374 NPPF (2024) paragraph 11 states (as relevant):

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

For decision-taking this means:

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

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

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

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

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

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

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

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

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

- 7.379 The application proposals are considered to accord with the requirements set out under Local Plan allocation SI 1. In particular, this final phase delivers a significant amount of green space and maintains a sense of separation between the developments at Houghton Grange and The Spires.
- 7.380 It is considered that the application site could satisfactorily accommodate up to 120 dwellings and the general layout could be made acceptable for reserved matters applications.
- 7.381 The proposed access is considered to be safe and acceptable in highway terms and the level of traffic generated by the development through the additional trips is not considered to be severe.
- 7.382 The majority of the application site is located within an area at the lowest risk of flooding (Flood Zone 1), and is therefore acceptable in principle in terms of flood risk and drainage.
- 7.383 In terms of the social dimension of sustainable development, the site appears to have no significant constraints and is deliverable. It would also increase the supply of housing, contributing up to 120 homes towards the housing supply on an allocated site; significant weight is afforded to this. The proposal will also result in the delivery of 40% affordable homes towards a significant district affordable need and substantial weight is afforded to this. As there is a local identified need for both private and affordable housing thus there would be a net benefit in social terms.
- 7.384 In terms of the economic dimension of sustainable development, the proposal would contribute towards economic growth, including job creation - during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. Moderate weight is afforded to this.
- 7.385 In terms of the environmental dimension of sustainable development, the proposal offers potential for the incorporation of energy efficiency measures (to be considered in detail at reserved matters stage) as well as the delivery of a net gain in biodiversity. The application site constitutes a sustainable location for the scale of development proposed in respect of access to local

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

- 7.386 The proposals will also deliver a significant extension to the publicly accessible “Berman park” (country park) secured on the former St Ives Golf Course, to connect the site to St Ives and formalising the sense of the space and public access to the south. Significant weight is afforded to this.
- 7.387 Financial contributions will be secured to support local infrastructure and moderate weight is afforded to this.
- 7.388 Less than substantial harm has been established to two Conservation Areas, a Grade II listed building and its curtilage listed Gate Lodge, which are all identified designated heritage assets, with the harm in each case being at the lower end of the scale. Substantial harm has been identified to one non-designated heritage asset (ridge and furrow) which must be taken into account applying a balanced judgment. Although considerable importance and weight must be given to the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990, applying Section 16 of NPPF (2024), the heritage harm here both individually and cumulatively would be outweighed by the public benefits as set out within this report.
- 7.389 The visual and landscape impacts of the proposed development are not considered to be significantly adverse and it is considered that a clear sense of separation is maintained between the developments at Houghton Grange and The Spires.
- 7.390 The proposals are in accordance with Policy SI 1 of the Adopted Local Plan and the Development Plan when taken as a whole. Applying paragraph 11 of the NPPF (2024), the identified harm would not significantly and demonstrably outweigh the identified benefits when assessed against the NPPF (2024) taken as a whole.
- 7.391 There is an overriding need for the development given the lack of a five-year housing land supply and having had regard to the site-specific development allocation in the Adopted Local Plan as set out in Policy SI1 St Ives West.
- 7.392 Having fully assessed all three objectives of sustainable development; economic, social and environmental within this report, the proposed development achieves these overarching objectives, and Officers consider the collective material benefits of the proposed development firmly outweigh the identified harm. Applying s.38(6) of the PCPA 2004, the proposed development is in accordance with the Development Plan and there are no

material considerations which indicate that permission should be refused.

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

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

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

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

OR

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

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

CONTACT OFFICER:

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

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

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

28 June 2023

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

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

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

1. We are instructed by Houghton & Wyton Parish Council (“**the Parish Council**”) and write in **objection** to the Application for the reasons set out below.
2. These representations are accompanied by two reports commissioned by the Parish Council prepared by Peter Radmall Associates:
 - (i) *Review of Applicant’s Landscape and Visual Appraisal (“the LVA Review”)*, which identifies failings in the Landscape and Visual Appraisal (“**LVA**”) commissioned by the Applicant; and
 - (ii) *Implications for Separation between Houghton and St Ives (“the Separation Report”)*, which considers the Parish Council’s concerns about the Development’s implications for coalescence and further urbanisation.
3. In summary, the Application conflicts with both the development plan and national planning policy. Material considerations also weigh against the grant of permission. In particular:
 - (i) The Development is contrary to a number of policies of the Huntingdonshire Local Plan to 2036 (“**the Local Plan**”), the Development:
 - (a) Does not protect the character of Houghton & Wyton, contrary to Policy LP 2 – Strategy for Development;
 - (b) Does not contribute to the landscape, wildlife, cultural and historical value of the area, contrary to Policy LP 3 – Green Infrastructure;
 - (c) Does not recognise the intrinsic character and beauty of the countryside, contrary to Policy LP 10 – The Countryside;

- (d) Does not respond positively to its context and does not apply the guidance in the Huntingdonshire Landscape and Townscape Assessment (2022) (**"the HLTA 2022"**), contrary to Policy LP 11 – Design Context; and
 - (e) Does not contribute positively to the area's character and identity or integrate with topography and landscape, contrary to Policy LP 12 – Design Integration
 - (f) Conflicts with the Site Allocation policy LP SI 1 (for St Ives Town) and applies the 10% tolerance found in text at D8 of the Local Plan in an arguably unlawful way by failing to adopt a masterplan at the outset and then proceeding to rely on the 10% tolerance in plan text at D8 for this Site rather than application of the tolerance across the whole SI 1 Allocation, leading to a demonstrable over-development of this Site, the remaining parcel of the SI 1 Allocation.
- (ii) Contrary to the policies of the Houghton Neighbourhood Plan (**"the Neighbourhood Plan"**):
- (a) the Development is outside of the Houghton & Wyton built up area and is within the open countryside and does not comply with the relevant policies for building in the countryside, contrary to Policy HWNP1 – Houghton & Wyton built up area.
 - (b) the Development does not respect the individual and distinct identities of the village of Houghton & Wyton and the town of St Ives because it individually and cumulatively results in the loss of visual and physical separation between those two settlements and would lead to their coalescence, contrary to Policy HWNP3 – Anti-coalescence.
- (iii) The Applicant's LVA does not demonstrate that the Development complies with Paragraph 174 of the NPPF requiring that it contribute to and enhance the natural and local environment by protecting and enhancing valued landscaped or recognising the intrinsic character and beauty of the countryside.

The Site

4. The Site represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St. Ives and lies within the Great Ouse Valley Landscape Character Area.¹ It forms part of Local Plan allocation SI 1 St Ives West (**"the SI 1 Allocation"**),² which allows for mixed use and approximately 400 homes, 23 ha of green space and social and community facilities. The proposed Development is the last of four separate parcels to be developed on the SI 1 Allocation, the other three being: (1) Houghton Grange Phase 1 - 107 houses, (2) The Spires - 186 houses, (3) The How - 19 houses. The Site is nevertheless to be regarded as open countryside.³

Planning policy

NPPF 174

¹ defined on pg.77 of the [Huntingdonshire Landscape and Townscape SPD \(2022\)](#).

² Page 195, [Huntingdonshire Local Plan](#)

³ Policy SI 1 provides (pg. 195) (underlining added): "Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications."

5. Paragraph 174 of the NPPF provides that (emphasis added):

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- (a) protecting and enhancing valued landscapes [...]*
- (b) recognising the intrinsic character and beauty of the countryside [...]*

The Local Plan

6. The Local Plan was adopted in May 2019 and includes the Site as allocation SI 1, St Ives West, for the redevelopment of Houghton Grange for approximately 400 homes, 23ha of green space and social and community facilities to meet the needs arising from the development. The policy includes *inter alia* the requirement for *completion of a detailed master planning exercise to be agreed with the Council* and (g) *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires (emphasis added)*

7. In addition, there are numerous Local Plan policies relevant to the application, and these include:

LP 2 Strategy for Development: provides that the development strategy for Huntingdonshire is to *“Protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside”*.

LP 3 Green Infrastructure: states that proposals should support green infrastructure, incorporating open space and protecting and enhancing the existing network (with reference to the Cambridgeshire Strategic Green Infrastructure Network). LP 3 also states that a proposal within the Ouse Valley Landscape Character Area will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area.

LP 11 Design Context: states that a proposal will be supported where it positively responds to its context and has drawn inspiration from key characteristics of the surroundings. Proposals need to apply the guidance in the Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Townscape Assessment SPD (2007) or successor documents⁴ and applicable conservation area character statements.

LP 12 Design Implementation: states that a proposal will be supported where it contributes positively to an area’s character and identity, integrating with topography and landscape

The Neighbourhood Plan

8. The Neighbourhood Plan, adopted March 2018, provides:

Policy HWNP3 – Anti-coalescence

⁴ The [Huntingdonshire Landscape and Townscape Assessment SPD \(2007\)](#) has been superseded by the [Huntingdonshire Landscape and Townscape SPD \(2022\)](#)

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

Huntingdonshire Landscape and Townscape SPD 2022 (“the HLT SPD”)

9. The parish of Houghton and Wyton lies within the Great Ouse Valley landscape character area (“**GOV LCA**”) identified in the HLT SPD, which notes that the landscape character of such parishes is derived from, and directly influenced by, the Great Ouse Valley. We note that the Applicant’s LVA refers to the superseded Huntingdonshire Landscape and Townscape Assessment 2007 and therefore does not address a number of important requirements in the current SPD, importantly that (underlining added):

Development proposals should:

- *Enrich the area by reinforcing its special qualities and acknowledging its distinct local character.*
- *Use appropriate building materials to retain the distinctive local character of villages.*
- *Maintain or enhance water quality and quantity and not lead to any adverse impact on flood risk or flood defences.*
- *Protect and enhance the strategic green corridor formed by the river valley, particularly where it passes through settlements.*
- *Minimise the environmental impacts of recreational activities.*
- *Protect and enhance the ecological value of the river, its margins and the valley floor.*
- *Promote opportunities for wildlife and conservation initiatives to support and enhance the area’s biodiversity.*
- *Protect the setting of historic structure such as bridges and mill buildings.*
- *Encourage public access along the Great Ouse Valley through.*

Representations

10. As undeveloped land, the Site is currently regarded as open countryside⁵ and represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St Ives. The visual and coalescence impacts of the Development are therefore of particular concern and require careful attention as required by LP SI 1 (g) mentioned above.
11. Despite this, the Applicant’s LVA does not adequately address a number of important issues relevant to policy and relies on the superseded Huntingdonshire Landscape and Townscape Assessment 2007.
12. The LVA Review highlights a number of serious flaws with the Applicant’s LVA and its findings, including:
- (i) Failing to assess the character of the site by considering its landscape/ perceptual attributes as receptors;

⁵ Policy SI 1 of the [Local Plan](#); Policy HWNP1 of the [Neighbourhood Plan](#).

- (ii) Failing to assess the site's representativeness or and contribution to published character types/ areas
 - (iii) Failing to assess the site's landscape components and perceptual attributes at a local level, including with reference to the adjoining conservation areas.
13. As a result, the LVA has played down the severity of effects, particularly those on the most sensitive visual receptors and, that smaller-scale variations at a local level may have been overlooked.
14. Because the LVA fails to assess the Development's effects on site character, including its component landscape/perceptual attributes, and does not explicitly assess the site's representativeness of/contribution to the published LCAs⁶ (especially the HLT SPD 2022, which requires that development proposals should Enrich the area by reinforcing its special qualities and acknowledging its distinct local character), it does not demonstrate that the Development does not conflict with the Local Plan policies identified above, or Paragraph 174(b) of the NPPF.
15. Additionally, as the LVA Review demonstrates, the failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the Site and failure to consider whether the Site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB, means that it is not demonstrated that the development complies with Paragraph 174(a) of the NPPF.
16. As explained in the Parish Council's Separation Report, the Development would encroach into open countryside and have a further urbanising influence on the locality, contrary to Neighbourhood Plan Policy HWNP1 – Houghton & Wyton built up area, Local Plan Policy LP 10 – The Countryside, SI 1 (g) and Paragraph 174(b) of the NPPF.

Anti-coalescence

17. The above failures related to the assessment of character also mean that there has not been adequate assessment taking account of the distinct identities of the village of Houghton & Wyton and the town of St Ives for the purposes of assessing compliance with Neighbourhood Plan Policy HWNP3 – Anti-coalescence. The Development presents very serious loss of openness of the remaining green gap between Houghton & Wyton and St Ives and would result in an increase in the actual and perceived coalescence between Houghton & Wyton and St Ives and urbanisation, such that the Development does not accord with the development principles illustrated in Local Plan Policy SI 1 and conflicts with Neighbourhood Plan Policy HWNP3 – Anti-coalescence.
18. Indeed, it is apparent from the Applicant's Design and Access Statement ("**DAS**") that, notwithstanding the strong policy requirement to retain actual and perceived separation between Houghton & Wyton and St Ives, the Applicant has failed properly to consider the importance of avoiding coalescence between the settlements in designing its development. As the Parish Council's Separation Report makes clear, extending built development eastward in close proximity to the main road running along the northern edge of the Site exacerbates the actual and perceived loss of separation and tightens the pinch points between the settlements in the vicinity of the water tower, which is entirely contrary to the schematic principles proposed in the LP SI 1 Allocation. Indeed, it is notable that the Schematic Layout included with Policy SI 1 Allocation deliberately leaves a green buffer to the east of the water tower. The design evolution in sections 4.3-4.4 of the DAS

⁶ LVA Review, section 5.

demonstrates that, contrary to the requirements of development plan policy, none of the design options tested involved any consideration of leaving open this most sensitive area of open countryside. The proposed development has thus, from inception, been contrary to adopted development plan policy. The Applicant has simply never considered, tested or otherwise assessed a proposal which would achieve the approach mandated by development plan policy.

Flawed application of 10% tolerance (LP text D8⁷)

19. The harmful landscape impacts and loss of settlement separation is the direct consequence of the applicant's aggressive and potentially legally flawed interpretation and application of the 10% tolerance found in a text in Section D: Allocations at D8 which HE has relied on to increase the number of dwellings on this Site, and the failure early to adopt a Masterplan for the whole of the whole of the SI 1 Allocation. These concerns have been raised in correspondence with Homes England ("HE") multiple times and HE have failed repeatedly to engage with the Parish Council on a way forward for successful development of the Site. We most recently wrote to the HE on 12 June 2023 and received no substantive engagement in response. The principal points we make in relation to the 10% tolerance are set out in our letter of 12 June but for ease are recorded below.
20. The material planning harm arising from the application arises from two inter-related material failures early on in the commencement of the development of the S1 1 Allocation:
 - (1) The first is HE's failure to agree with adjoining landowners and submit for approval a masterplan for the entire S1 1 Allocation before approvals in 2021-2022 for the Grange Phase 1 and the How (19/01180/REM and 19/02280/FUL respectively), as required by the policy. This was a critical requirement in the policy that was never achieved.
 - (2) The second is that HE has adopted an arguably flawed legal interpretation of an application of the 10% tolerance found in text at D 8 in which results in overdevelopment of this Site, the last parcel that comprises the S1 1 Allocation.
21. Had a masterplan been in place as required by SI 1 (a) to guide development across the S1 1 Allocation, it would have been possible to decide at the outset whether and how best to use the 10% tolerance across the SI 1 Allocation and in accordance with the indicative layout in policy S1 1. As matters stand, there was no agreement through the masterplan process on how to allocate the 10% tolerance, and now HE is seeking to take advantage of the entire 10% tolerance which applies for the whole allocation of 400 dwellings to this Site, being the last remaining (and arguably most sensitive) parcel of undeveloped land within the SI 1 Allocation.
22. In other words, the Applicant's approach is to seek to rely on the fact that it did not include the relevant pro rata of the 10% tolerance on any of the other three parcels which comprise the SI 1 Allocation as a justification for an excess of new dwellings well in excess of 10% on the last Site's capacity. This is a fundamentally flawed interpretation and application of policy resulting in material planning harm, namely breaches of anti-coalescence objectives in policies in the District Local Plan and the Houghton & Wyton Neighbourhood Plan (P1 and P3). If the current parameter plan is approved without the changes they seek to address their concerns, the Parish Council are prepared to test these policies and the

⁷ D8 provides for flexibility in delivering allocations and proposes a 10% tolerance either side of the allocation figure.

erroneous construction of the 'tolerance' through the courts. For this purpose, and reluctantly, the Parish Council have already retained Counsel, Charles Streeten of Francis Taylor Building, in anticipation of any litigation.

23. Since litigation is costly for all parties, and would introduce delay to the consent process, the Parish Council sought a meeting with HE representatives to discuss these concerns, with an expectation that scheme changes could result in a revised parameter plan layout they can support.
24. In summary, the Parish Council can support a scheme with modest changes to the north of Site, which at present presents a hard and overdeveloped edge. They wish to see the Site frontage pulled back from Houghton Road to introduce a softer landscaped edge to the access into the Development, as shown in the indicative plan to the SI 1 Allocation. This will help to define a clear division between Houghton & Wyton from the town of St Ives. This separation would also improve the amenity for these edge-facing houses otherwise adversely impacted by the traffic on Houghton Road.
25. The second change the Parish Council requests is to the footprint of the development to reduce the spread of the eastern edge so as to reduce the overall developed area to less than that in Phase 1. The eastern edge unnecessarily encroaches into the landscape buffer which separates the parish from St. Ives, and which creates an inappropriate hard suburban edge to the landscape buffer.
26. These changes to the parameter plan are economically viable in light of FOI correspondence with HE, which confirms that there is no commercial necessity for excess housing on this Site, the last parcel of the S1 1 Allocation in the Local Plan 2019. FOI references RFI3582 and RFI13408 reveal that the total HE site was valued at £7.2m, with Houghton Grange Phase 1/Morris Homes sold for 4.6m, hence leaving a residual value for the Site of £2.6m.

Transport Impacts

27. We note Cambridgeshire County Council's comments on the proposal dated 25.5.23 which state that the application does not include sufficient information to properly determine the highway impact of the proposed development and therefore request the application is not determined until such time as the additional information has been submitted and published for public comment.
28. However, recent traffic studies - notably in connection with Eagle Mill (HDC ref 22/00371/FUL); Houghton & Wyton's successful 2022/23 LHI application and justification for speed reduction along the A1123; together with HDC's Option Assessment Report for the St. Ives Transport Study, all point to capacity issues on this road and therefore provide further evidence and support for a reduction in the overall number of dwellings on the Site.

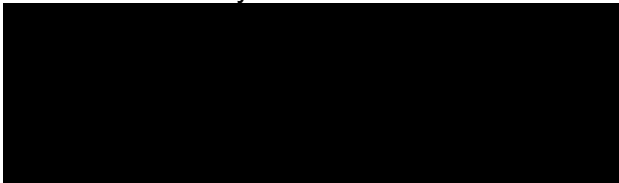
Flooding

29. We also note the comments from CCC, the lead flooding authority, Cambridgeshire Water and Anglia Water, which refer to capacity issues within the system and potential for flooding downstream if certain conditions are not met.
30. Given the seriousness of the situation, these issues need to be addressed in full before an outline planning decision is made regarding given the excess of development proposed for the Site.

Conclusion

31. For the reasons detailed in the LVA Review, there are deficiencies in the Applicant's LVA such that its conclusions cannot be relied upon and the Development conflicts with policy on landscape.
32. Furthermore, as confirmed by the findings in the Parish Council's Separation Report, the Development has implications for coalescence, urbanisation and impacts on openness such that it conflicts with the policies identified above.
33. For the reasons set out above, **the Application should be Refused.**

Yours faithfully



Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT



IMPLICATIONS FOR SEPARATION BETWEEN HOUGHTON AND ST. IVES

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

June 2023

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1. Introduction

1.1 Peter Radmall Associates have been commissioned by Houghton and Wyton Parish Council to review the implications of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT) for maintaining separation between Houghton village and the built-up area of St. Ives.

1.2 The description of development is as follows:

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

1.3 A landscape and visual appraisal (LVA, AECOM, March 2023) has been submitted in support of the application. A review of the LVA has been presented as a separate document.

1.4 This note is organised as follows:

- Section 2 summarizes the relevant policy context;
- Section 3 describes the current relationship between Houghton and St. Ives and the contribution made by the site;
- Section 4 assesses the impact of the proposed development on spatial and visual separation; and
- Section 5 provides a summary and conclusion, including the implications for relevant policy.

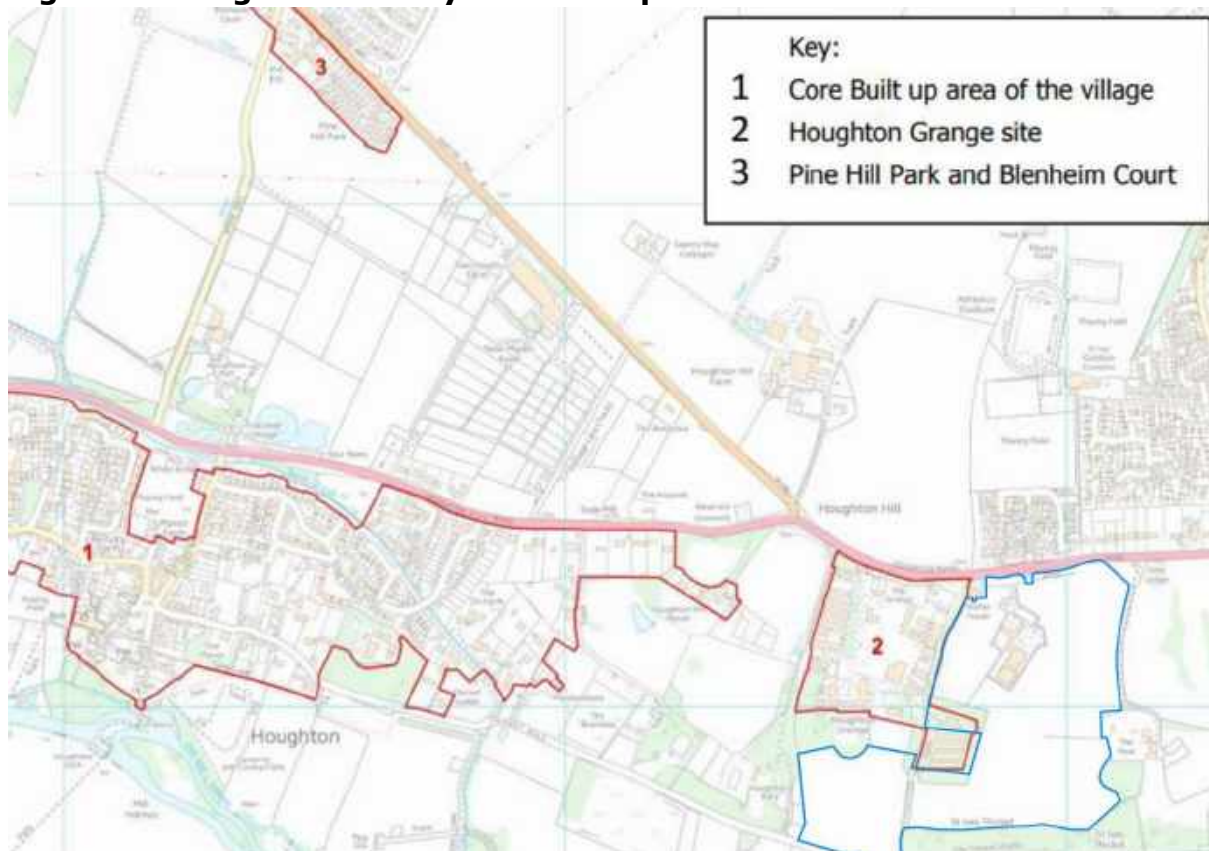
1.5 This exercise has been based on a site visit, discussions with Parish Council members and review of relevant documentation, notably the Neighbourhood Plan, the LVA, the NPPF and the applicant's Planning Statement.

2. Policy Context

Neighbourhood Plan

- 2.1 Objective 3 of the NP is *"To retain the separate identity of Houghton and Wyton as a small rural village and avoid any further merging with neighbouring towns and villages."*
- 2.2 This objective is directly reflected in two NP policies:
- HWNP1: Houghton and Wyton built up area; and
 - HWNP3: Anti-coalescence.
- 2.3 Policy HWNP1 defines the built-up area boundary for the village and confirms that areas outside this boundary form part of the open countryside. Proposals within this area are considered to *"be acceptable where they comply with relevant policies for building in the countryside."* The site's relationship to the built-up area boundary (shown as a red line) is shown in **Figure 1** (extracted from NP Figure 3, with the site boundary added as a blue line).

Figure 1: Houghton and Wyton Built-Up Area



- 2.4 As can be seen, the site lies immediately to the east and south of the Houghton Grange part of the built-up area. This forms an outlier of recent development within the greater part of the former poultry research station that occupied the

site from 1948-1992. This development, known as Houghton Grange Phase 1, is partly (c20%) complete and is accessed through the application site from the signalised junction on Houghton Road opposite Garner Drive. In the context of NP policy, the site is therefore located within open countryside.

2.5 Policy HWNP3 states the following: *“Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation between these two settlements, or would lead to their coalescence.”*

2.6 The following main themes emerge from this:

- i. The policy explicitly applies to separation between the village and St. Ives;
- ii. Separation implies the maintenance of sufficient undeveloped (and ideally greenfield) land between the settlements to be perceived as an open gap. Openness can be interpreted both spatially (i.e. in terms of the absence of built development) and/or visually (i.e. so as to maintain a degree of visibility across the gap).
- iii. The policy test refers to loss of separation, which can reasonably be interpreted to mean a “material reduction” as well as its elimination, as would result from coalescence (i.e. merging); and
- iv. This can apply both to an individual development and to its cumulative effect, taking account of existing and/or other consented developments.

2.7 The last point above is specifically relevant in view of the allocated status of the application site, and recent extension of the settlement edge of St. Ives up to the parish boundary (see below).

Local Plan Allocation

2.8 The application site, together with Houghton Grange Phase 1 (to the west) and a triangular area to the east (most of which was formerly the St. Ives Golf Course), fall within Strategic Allocation S11: St. Ives West, as identified in the Local Plan (May 2019). The site’s relationship to this area is shown on **Figure 2**.

2.9 The northern parcel of land to the east has now been built out (The Spires), whilst development of the land to the south of this (The How) is underway. With completion of these developments, the application site (known as the BBSRC field) represents the last remaining parcel of open land separating the settlement edges of Houghton/Wyton and St. Ives.

Figure 2: Relationship to St. Ives West Allocation



- 2.10 This is acknowledged in Policy S11, which states that: *“Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications.”* Until that time, however, the site is to continue to be regarded as open countryside.
- 2.11 The need to retain a degree of separation is also acknowledged in the policy, which states that *“Successful development of the site will require... a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires.”*
- 2.12 Para 11.9 of the explanatory text states that: *“Housing development should be predominantly situated in the northern part of the site and arranged in a series of clusters separated by green corridors running north-south through the site both to screen and separate areas of development and to connect through to the greenspace in the south of the site. A substantial band of greenspace should be retained through the portion of the BBSRC field to the east of the derelict buildings and up to the western edge of residential development at 'The Spires'. Management plans should be prepared for the greenspaces within the site which should encourage ecological diversity”.*

Other Policy

- 2.13 As noted above, the status of the site remains that of open countryside (until such time as it has been developed). This means that the following policies and guidance also remain engaged:
- i. Local Plan 10: The Countryside;
 - ii. Local Plan 31: Trees, Woodland, Hedges and Hedgerows;
 - iii. Huntingdonshire's Landscape and Townscape Assessment SPD (2007); and
 - iv. NPPF 174 re the need for *"planning...decisions [to] contribute to and enhance the natural and local environment [my emphasis] by...(b) recognising the intrinsic character and beauty of the countryside..."*
- 2.14 It should be noted that it is arguable whether NPPF 174(a) re valued landscape may also be engaged. Whilst the value of the site and its setting has not been assessed in the LVA with a view to confirming this, it is clear that parts of it are of value (e.g. within the conservation areas and their setting). In addition, the "host" character area in which the site is located (LCA 4: Ouse Valley) is, according to the Neighbourhood Plan, *"what makes this such a special place to live or visit"* [NP 3.4]. It is also noted that this part of the Great Ouse Valley is a candidate for designation as an AONB, and that the application site falls within the defined area (ref separate LVA review).

3. Role of the Site in Maintaining Separation

Physical Separation

- 3.1 The character of the site and its relationship to the surrounding areas is shown in **Figure 3**. This aerial photo (from Google Earth) is now somewhat outdated, in that the poultry sheds that formerly occupied the central/northern part of the site have been demolished, and the junction/access road serving Houghton Grange Phase 1 has been completed. In addition, development within Houghton Grange and The How is well advanced.

Figure 3: Overview of Site and Immediate Context



- 3.2 The main part of the site clearly remains as the last “gap” of open land to the south of Houghton Road, separating the settlement edge of St. Ives from that of Houghton (as represented by the eastern edge of Houghton Grange Phase 1). This separating function is reinforced by the open and/or greenfield condition of most of the site, and the buffers of established vegetation that form its western and eastern boundaries. These features also reinforce its role as part of the open countryside.
- 3.3 The relatively recent completion of the Garner Drive development, to the north of Houghton Road, has extended the settlement edge of St. Ives the equivalent distance along the site frontage. As a result, this separating function is essentially interrupted by a pinch-point at the water-tower, before it is resumed

by the arable land to the north of Houghton Grange. This has become a “gateway” location in terms of how the transition between Houghton and St. Ives is perceived on the ground (see below).

Visual Separation

3.4 The separating function of the site is best appreciated from the sequence of views experienced along Houghton Road. **Figures 4-10** below show the views travelling eastwards from Houghton, the key features of which are as follows:

- Fig 4: Just east of the Sawtrey Way junction, the vegetated frontage to Houghton Grange frames the view to the right, whilst open views are gained across arable land towards the settlement edge of St. Ives to the left.
- Fig 5: Approaching the historic entrance to Houghton Grange, the lodges interrupt the vegetated frontage to the right, whilst a sense of openness is retained beyond the hedgerow to the left.
- Fig 6: Approaching the water-tower, new dwellings are seen through the vegetated frontage of Houghton Grange to the right, whilst a view opens up to the left towards the settlement edge of St. Ives. The water-tower is behind the group of conifers in the middle ground.
- Fig 7: At the “pinch-point” approaching the St. Ives welcome sign, the settlement edge of St. Ives approaches the road corridor from the left, whilst the site frontage opens up beyond the trees to the right.
- Fig 8: At the Garner Drive/Houghton Road junction, the proximity of the settlement edge to the left, and the urbanizing influence of the junction, are evident. However, the site reintroduces a sense of openness to the right, providing views towards the vegetated frontage to The Spires.
- Fig 9: Despite the paraphernalia associated with the access road (temporary screen fencing, flagpoles etc), the site clearly retains a greenfield condition, providing views towards the vegetated frontage of The How.
- Fig 10: The road corridor begins to close in as it approaches the settlement edge, although the site retains a sense of openness to the right, with development in The Spires visible beyond.

3.5 **Figures 11-16** below show the views travelling westwards out of St. Ives, the key features of which are as follows:

- Fig 11: At the entrance to The How, whilst the road corridor is well vegetated, it is clearly embedded within the built-up area (note the driveways accessing it to the right).

Figure 4: Eastward View along Houghton Road (a)



Figure 5: Eastward View along Houghton Road (b)



Figure 6: Eastward View along Houghton Road (c)



Figure 7: Eastward View along Houghton Road (d)



Figure 8: Eastward View along Houghton Road (e)



Figure 9: View into Site from Garner Drive



Figure 10: Eastward View along Houghton Road (f)



- Fig 12: Beyond The How, the site begins to open up to the left, with the Houghton and Wyton welcome sign visible in the middle ground, whilst the road corridor also widens on the approach to Garner Drive.
- Fig 13: Approaching the junction, the openness of the site is very evident to the left (even though the roadside hedgerow screens its greenfield cover). Medium-distance views are gained towards the vegetated frontage of Houghton Grange, with the settlement edge of St. Ives visible to the right.

- Fig 14: View north-westwards, looking towards the “pinch-point” at the water-tower. The openness of the arable land beyond the settlement edge is apparent, with the vegetated character of Houghton Grange to the left.
- Fig 15: View from the pinch-point, with the water-tower visible to the left, the vegetated frontage of Houghton Grange beyond, and the openness maintained by the arable fields north of the road to the right.
- Fig 16: New dwellings within Houghton Grange are visible to the left, within an otherwise vegetated frontage, whilst the arable land maintains openness to the right.

Figure 11: Westward View along Houghton Road (a)



Figure 12: Westward View along Houghton Road (b)



Figure 13: Westward View along Houghton Road (c)



Figure 14: View from Site Access Road



Figure 15: Westward View along Houghton Road (d)



Figure 16: Westward View along Houghton Road (e)



Other Views

3.6 The openness of the site can also be appreciated from LVA VP5, which is taken from a PRoW on its southern boundary – ref **Figure 17** below (and **Figure 19** for the VP location). Three key points should be noted from this view:

- Apart from the poultry sheds seen on the skyline in the centre of the view, the character of the site is dominated by its grassland cover and its established tree belts, which give it a semi-parkland appearance.

- These sheds have since been demolished, and at the time of my own site visit (in May 2022) had been reduced to a mound of rubble (ref **Figure 18**); and
- Neither the settlement edge of St Ives nor buildings within the Houghton Grange Phase 1 site are visible in the LVA view.

3.7 The perception of the site from LVA VP5 reinforces both its role as part of the open countryside and its contribution to maintaining visual openness as a foil to both the vegetated character of Houghton Grange and the built-up character of St. Ives beyond the skyline.

Figure 17: LVA View from VP5



Figure 18: May 2022 View from Further North within Site



4. Impact of the Development

Spatial Openness

- 4.1 The proposed built development would occupy c22.5% of the site, concentrated in its north-western corner, on either side of the existing access road. The remainder of the site would be retained as green infrastructure for a range of uses, including informal recreation, biodiversity enhancement, structural landscaping, a SuDs pond and children's play.
- 4.2 Whilst the majority of the site would technically remain open, the concentration of development adjacent to Houghton Road would reduce the existing width of the east/west green gap between Houghton Grange and The Spires (i.e. the settlement edges of Houghton and St. Ives respectively) by an average of c66%.
- 4.3 As a result, the functional gap would be reduced to a corridor of green space c100-150m wide occupying the eastern third of the site, beyond the developed area. In addition, the location of the development would "plug" the pinch-point between Houghton and St. Ives close to the water-tower, such that any residual separation between the settlements would be confined to the width of the road corridor along a 150m long section of Houghton Road. Since this section of road is inherently urban in character (with traffic lights, street lights, signage etc), its separating function is unlikely to be meaningful.

Visual Openness

- 4.4 The ZTV presented in the LVA shows that the immediate visual influence of the built development would extend east/west along Houghton Road, north-westwards across the arable land to the north, and across the remainder of the site eastwards to the settlement edge of St. Ives and south/south-westwards as far as The Thicket (ref **Figure 19**). As shown in the visual analysis in Section 3, these open areas currently contribute to the perception of separation between Houghton and St. Ives.
- 4.5 The Year 1 visualizations for Views 6 and 5, extracted from the LVA, confirm the loss of openness that would result (ref Figures 20 and 21). In View 6, built development would entirely obstruct the sense of openness that is currently gained from looking along the access road. In View 5, the development would infill the gap in the vegetated skyline that remains following demolition of the poultry sheds, introducing buildings into a view where none currently occur.
- 4.6 In addition, the proposed tree planting within the undeveloped parts of the site would over time further reduce visual openness (as well as screening views of

the development). This will particularly apply to views from Houghton Road, as planting along the road frontage becomes established.

Figure 19: Extract from ZTV with Viewpoint Locations



Intrusion into Countryside

- 4.7 As noted previously, the majority of the site qualifies as open countryside and its appearance contributes to that role (even though its recent use and management may not have been positive). In physical terms, the development would result in the urbanization of less than a quarter of the site, which is envisaged would be perceived as an extension to Houghton.

Figure 20: Year 1 Visualization for VP6



Figure 21: Year 1 Visualization for VP5



- 4.8 The proposed treatment of the remainder would include a range of initiatives that could enhance some of its attributes as countryside, notably its biodiversity, appearance and accessibility. At the same time, however, the urbanizing influence of the development would extend across much of the site, through its visual impact (ref **Figure 19**), its implications for tranquillity, and the introduction of recreational uses that are typical of urban fringe locations. The degree to which these parts of the site would continue to be perceived as open countryside may therefore be arguable.

Comparison with Notional Allocated Scheme

- 4.9 Whilst Policy S11 does not specify the precise footprint of development, the explanatory text includes an illustration of how the allocation is envisaged to be laid out in general terms. This is shown in **Figure 22** below (which has been annotated to provide more information).
- 4.10 Comparison with the submitted Parameter Plan (ref **Figure 23**) shows that built development was originally envisaged:
- not to extend east of the access road junction, so as to occupy a smaller proportion (up to c55%) of the distance between the edges of Houghton Grange and The Spires/The How;
 - to be pulled southwards from Houghton Road, broadly corresponding to the alignment of the access road, rather than infilling between the access road and the main road; and

- to occupy a footprint demonstrably smaller than that of Houghton Grange.

Figure 22: Schematic Layout from Policy S11

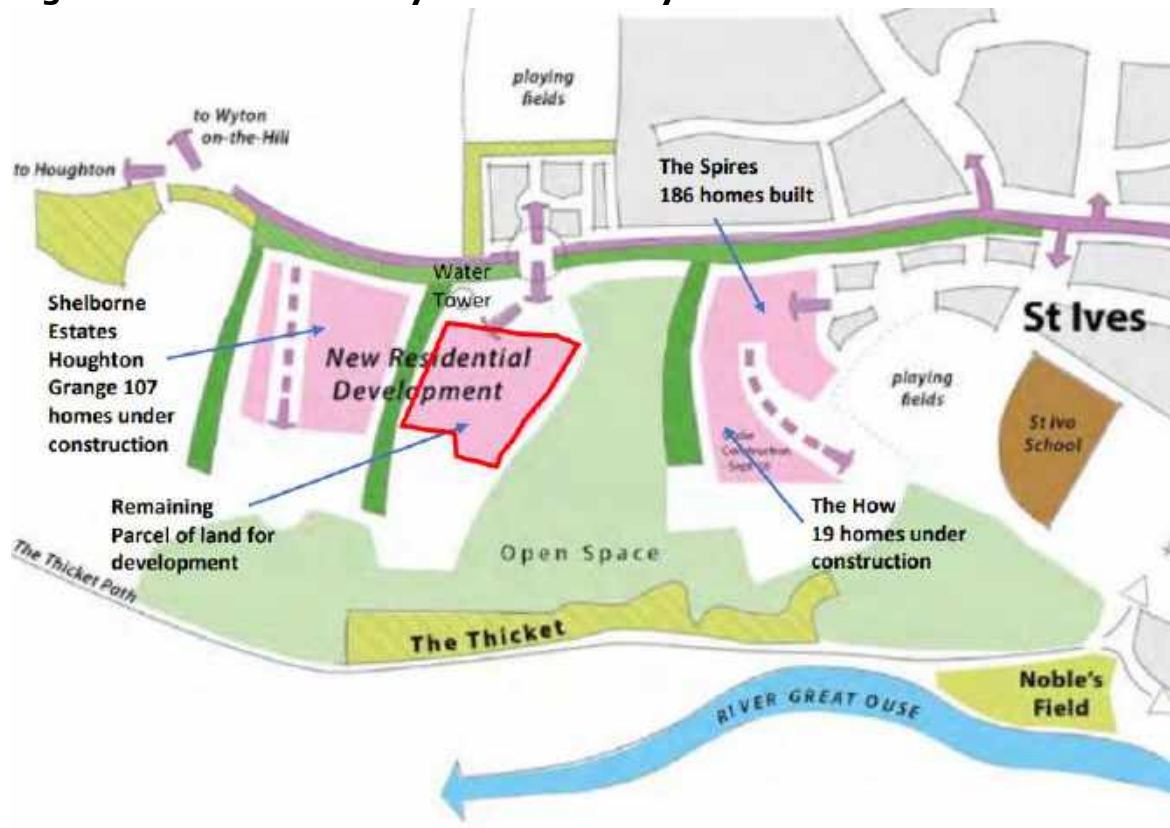


Figure 23: Parameter Plan



- 4.11 By extending built development further to the east, and closer to the main road, the current proposal exacerbates the actual and perceived loss of separation and tightens the pinch-point between the settlements in the vicinity of the water tower. This is evidently contrary to the schematic principles proposed in the policy.

5. Summary and Conclusion

- 5.1 The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road. The majority of the site retains a greenfield character that reinforces its role as part of the open countryside. Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).
- 5.2 The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road. This has created a “pinch-point” between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.
- 5.3 The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires. It is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.
- 5.4 Development would occupy only c22.5% of the site. However, it would be concentrated on its north-western corner, adjacent to Houghton Road. As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.
- 5.5 The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west. The visualizations in the LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.
- 5.6 The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins. This is clearly contrary to NP Policy 3.
- 5.7 It is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.

- 5.8 The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b).
- 5.9 The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.

23rd June, 2023

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Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT



REVIEW OF APPLICANT'S LANDSCAPE AND VISUAL APPRAISAL(LVA)

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

June 2023

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1. Introduction

- 1.1 I have been commissioned by Houghton and Wyton Parish Council to carry out a review of the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT). The description of development is as follows:

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

- 1.2 A landscape and visual appraisal (LVA, AECOM, March 2023) has been submitted in support of the application. This document comprises a review of the LVA in terms of its compliance with best practice and comments on whether its findings appear to be robust, complete and reasonable.

- 1.3 The exercise has been informed by the relevant technical guidance¹, which advises that such reviews should consider:

- the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
- the baseline, content and findings of the assessment; and
- the presentation of the assessment findings.

- 1.4 The review has been based on:

- the submitted LVA material and other relevant application documents/drawings;
- published guidance and policy documents (notably GLVIA3²); and
- a visit to the site and surrounding area;

Limitations

- 1.5 The following limitations should be noted:

- This review does not purport to be an LVA/LVIA in its own right, and therefore does not attempt to identify and categorise all the potential effects;

¹ Reviewing LVIA's and LVAs, LI TGN 01/20 (January 2020)

² Guidelines for Landscape and Visual Impact Assessment, LI/IEMA, 2013

- It has not at this stage included a detailed technical audit of the photographic and visualization material;
- Consequently, it places a degree of reliance on the submitted material;
- The fieldwork undertaken for this review was confined to publicly-accessible locations, and only selected viewpoints were visited;
- The review has not considered the status of, or the weight to be given to, relevant policy; and
- Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

2. Compliance with Best Practice

- 2.1 The LVA has been reviewed in terms of its compliance with the main requirements of the process as set out in GLVIA3 and prevailing practice; this is presented in **Table 1** below. Responses that raise queries or potential concerns are shown in bold and are addressed in Section 3.

Table 1: LVIA Compliance Checklist

Criterion	Response	Comment
1. Overall Approach		
1.1 Does the assessment distinguish between landscape and visual effects?	Yes	
1.2 Are the methodology and terminology clearly explained?	Yes	LVIA Appendix A
1.4 Does the assessment state whether the effects are beneficial, adverse or neutral?	Yes	
1.5 Does the assessment distinguish between the effects of construction and the completed development?	Yes	
1.6 Where a potential for adverse effects has been identified, has mitigation been proposed?	Yes	Embedded/primary mitigation is described in LVA Section 6 and is shown on LVA Appendix B, Figure 6: Parameter Plan
1.7 Has the effectiveness of this mitigation been assessed (e.g. by reporting effects at Years 1 and 15)?	Yes	
2. Presentation		
2.1 Is the LVA clearly structured and presented?	Yes	
2.2 Is it adequately supported by:		
- Maps/plans?	Yes	LVA Appendix B
- ZTV?	Yes	
- Photos?	Yes	
- Visualizations?	Yes	
3. Landscape Character		
3.1 Has reference been made to published LCAs at the appropriate levels?	Yes	At national (NCA 88) (LCA 4.2.3.1) and district (Huntingdonshire LCA/TCA, LVA 4.2.3.2) levels.
3.2 Has the character of the site been adequately described and assessed?	Partly	Whilst the site is described (LVA 4.2.2), neither it nor its landscape/perceptual attributes (e.g land cover, landform, significant

		vegetation, openness) have been treated as receptors for assessment purposes.
3.3 Has the site's representativeness of/contribution to the published character types/areas been assessed?	No	There is no explicit consideration of this in LVA Section 7, since the site is not identified as a receptor.
3.4 Have relevant designations been identified?	Yes	There are no landscape designations within the study area. However, the Houghton & Wyton and St Ives Conservation Areas adjoin the site, and the settings of such areas are a material consideration.
3.5 Have the relevant landscape receptors been assessed?	No	Landscape receptors are confined to the district-level LCAs – ref LVA Section 7. Neither the site, its landscape components and perceptual attributes, the adjoining conservation areas or their component sub-areas are identified as receptors.
3.6 Has landscape sensitivity been assessed on the basis of its susceptibility and value?	Yes	LVA Section 7.
3.7 Has the LVA considered whether the site may form part of a valued landscape?	No	The value of the site and its immediate setting (which includes parts of the conservation areas) has not been explicitly considered.
4. Visual Impact		
4.1 Has a ZTV/ZVI been produced?	Yes	Ref LVA Figures 4 + 5
4.2 Were the assessment views agreed with the LPA?	Assumed Not	Since there is no reference to such agreement in the LVA.
4.3 Are these views sufficiently representative?	Partly	See below – Whilst 20 views suggest a reasonable degree of coverage overall, a query have been raised about viewpoint selection.
4.4 Have seasonal influences been taken into account?	Partly	Although the photos were taken in July, the Y1 assessment is based on a winter (i.e worst-case) scenario - but the Y15 assessment is based on a

		summer (i.e. best-case) scenario.
4.5 Can the photography and visualizations be relied upon?	Assumed So	In the absence of a detailed technical audit.
4.6 Have all potential receptors been identified?	Partly	Ref LVA Section 5.2 – subject to query relating to viewpoint selection
4.7 Has their sensitivity been properly assessed?	Partly	Ref LVA Section 7 – queries have been raised about the sensitivity of some residents and users of PRowS.
5. Policy Considerations		
5.1 Does the LVA set out the landscape policy context?	Yes	LVA Section 2
5.2 Does the LVA comment on the degree to which the proposed development complies/conflicts with relevant policy?	No	But this is not unusual, and is typically addressed in the applicant's Planning Statement.

3. Key Points Arising

- 3.1 Whilst the LVA has been carried out in accordance with the principles of the guidance, the following queries and potential deficiencies should be noted:
- i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;
 - ii. The site's representativeness of/contribution to the published LCAs has not been assessed;
 - iii. The conservation areas adjoining the site (and their component sub-areas) have also not been identified as landscape receptors;
 - iv. There has been no explicit consideration of whether the site may form part of a valued landscape;
 - v. The assessment views do not appear to have been agreed with the LPA;
 - vi. The location/representativeness of some of the viewpoints – the Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered;
 - vii. Seasonal influences on visibility and effects are not evident from the photography/visualizations;
 - viii. The reliability of the visual material has been taken as read; and
 - ix. The sensitivity of some visual receptors.

Effects on the Site and its Component Attributes

- 3.2 The assessment of landscape character effects is essentially an aggregating exercise, whereby changes to individual landscape components and perceptual attributes may to varying degrees "cascade upwards" through each specific site, locality, neighbourhood, study area and hierarchy of published character areas (district to national).
- 3.3 This is reflected in the guidance, which states that "*The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected..., often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects.*" [GLVIA3, 5.34 bullet 1].
- 3.4 Since the LVA does not follow this approach, and identifies only the district-wide LCAs as receptors, it is difficult to understand how it has arrived at its assessment of effects on them. This is particularly the case because there is

no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs.

Effects on the Conservation Areas

- 3.5 The relationship of the site to the two conservation areas is shown in **Figure 1** below (extracted from the DAS). Whilst conservation areas are primarily heritage designations, they often have landscape (as well as townscape) implications, particularly where they may include greenfield land and/or possess a wider setting. That is the case here.
- 3.6 The ZTV mapping (LVA Figures 4/5) indicates that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The LVA fails to assess whether there would be any effects on the character or setting of either CA.

Figure 1: Relationship to Designations



Valued Landscape

- 3.7 The LVA does not consider whether the site may form part of a valued landscape, and thereby worthy of consideration under NPPF174(a), by following

either Box5.1³ or Table 1 in TGN02/21⁴. It is not the purpose of this review to carry out such an assessment or to put forward a case for the site to be regarded as such.

- 3.8 However, whilst most of the site is not officially accessible to the public, and its northern part is of unremarkable character, its sloping southern part is more distinctive. In addition, its south-western part falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton CA, whilst its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.
- 3.9 In addition, the site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB). AONBs define landscapes that are of national importance for the protection and enhancement of their natural beauty, designated under the National Parks and Access to the Countryside Act, 1949.
- 3.10 The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.
- 3.11 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site is considered to contribute to that value. This has not been acknowledged in the LVA.

Visual Assessment

- 3.12 It is good practice to agree the assessment views with the LPA. Since the LVA makes no reference to such an agreement, it is assumed that this was not the case here.
- 3.13 The assessment has been based on 20 representative viewpoints, as shown on **Figure 2** below. These are presented as “Type 1” visualizations (i.e. existing views annotated to show the site extent, blue dots), of which six were then used for the preparation of “Type 4” visualizations (i.e. existing views with the development envelope added, pink dots).
- 3.14 At first sight, this appears to represent a reasonable number and distribution of views. However, in view of the parish council’s concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful.

³ GLVIA3 p84

⁴ Assessing landscape value outside national designations, Landscape Institute, February 2021

- 3.15 Whilst no detailed technical audit of the ZTV, photography or visualizations has been undertaken at this stage, a preliminary review of this material (by MS Environmental) has raised the following points:
- The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4km in height, but their ZTVs typically extend to 5km).
 - The ZTV with visual buffers is poor, as it identifies viewpoints with no visibility.
 - Whilst there are 20 identified viewpoints, all but three have no view of the site and should probably have been replaced; these include four of the six "Type 4" visualizations.
 - Winter and summer photography should have been provided for each viewpoint.
 - Viewpoint 6 ("Type 3") fails to capture the full extent of the site and is a poor example; in addition, it is not clear why this is specified as Type 3 rather than Type 4.
 - There should be additional closer-range viewpoints along Houghton Road and the Ouse Valley Way.
 - The reference to a 10-15m tolerance on the Parameter Plan is ambiguous, although it is assumed to apply to layout.
- 3.16 Whilst the LVA allows for variations in effects between summer and winter conditions, these are not evident in the photography and visualizations, which only show the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability, and in the judgments based on it, and in view of the March submission date for the LVA could conceivably have been provided.
- 3.17 Finally, the discrepancies in sensitivity between the same categories of visual receptor are not readily explicable. Of the six receptor groups comprising users of PROWs or public access land, three are of medium sensitivity and three are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that *"visual receptors most susceptible to change are...likely to include...residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way..."*.

Figure 2: ZTV with Viewpoint Locations



4. Critique of LVA Findings

Sources of Impact

4.1 Since the development is fully described in the Design and Access Statement and elsewhere, a summary of the main sources of landscape/visual impact will suffice as follows (for reference purposes, the Parameter Plan is presented in **Figure 3**):

- The current use of most of the site (as former pasture) would be displaced.
- The Arboricultural Impact Assessment reports the following regarding tree loss:
 - Thirteen individual trees, eight full groups and part of eight groups are to be removed to facilitate the Proposed Development; this includes part of four groups classed as high quality (Category A), three individual trees and part of two groups classed as moderate quality (Category B) and the remaining ten individual trees, eight full groups and part of two groups classified as low quality (Category C).
 - In addition, nine individual trees, three full groups and part of one group which are identified as unsuitable for retention (Category U) in the context of the current land use are also required for removal to facilitate the Proposed Development. These trees are arguably not suitable for long term retention and their removal is justified regardless of the Proposed Development.
 - Further tree removals may be required to facilitate the installation of pedestrian footways within the RPAs of G269, G270, G315 and G319 (of high quality) and G196 and G333 (of moderate quality)
- The part of the site to be developed is gently sloping and would to a degree need to be reprofiled to accommodate the building footprints and access/parking areas.
- Vehicular access would be provided off the constructed Houghton Grange Phase 1 access road.
- The buildings would be a maximum height of two storeys (10m to ridge).
- The development area would occupy c22.5% of the site, concentrated in its north-western corner.

- The remainder of the site would comprise green infrastructure, including a mix of informal amenity space, children's play, habitat creation, a SuDs pond, retained tree cover and new structural planting, with new pedestrian/cycle links to the surrounding area.
- Once completed and occupied, the development would introduce lighting onto what is currently an unlit site (although the nearby sections of Houghton Road and adjoining built-up areas are lit).

Figure 3: Parameter Plan



Construction Effects

- 4.2 The LVA predicts the landscape character effects to be no greater than minor adverse (for LCA4: Ouse Valley) and the visual effects to be no greater than moderate adverse (for users of the informal path on the southern part of the site, travellers on Houghton Road and residents of Garner Drive) [ref LVA 8.1.1.3].

- 4.3 These conclusions appear to be consistent with the judgmental framework used in the LVA. In relation to the landscape effects on LCA4, LVA Table 3-9 (in LVA Appendix A) indicates that a low magnitude of change to a highly sensitive receptor can give rise to a moderate/minor effect, and it is assumed that the conclusion of minor in this case reflects the limited duration of the works.

Year 1 Landscape Effects

- 4.4 The LVA predicts that the landscape character effects would be no greater than minor adverse, in relation to LCA3, resulting from a low magnitude of change to a receptor of high sensitivity [LVA 8.1.2.3]. This reflects the relatively low sensitivity part of the site where built development would be located, together with its insignificant proportion of/peripheral location within the LCA, and its separation from the remainder of the LCA by St Ives Thicket.
- 4.5 Whilst this logic appears to be reasonable, an explicit evaluation of the role of the site within the LCA would have been helpful. In addition, the district-wide LVAs are relatively large-scale units, and LCA4 includes locally significant variations in character such as the St Ives urban fringe, the Houghton Grange estate/recent residential development, the valley slopes, River Ouse floodplain and valley crest (where the built development would be located).
- 4.6 A finer-grained assessment may well have teased out more meaningful variations in effect. Such an approach should arguably have considered the potential for effects on the character and/or setting of the two conservation areas (rather than leaving this entirely as a matter for the Cultural Heritage DBA), and also the relevant character areas identified in Appendix 1 of the Neighbourhood Plan.
- 4.7 In relation to the St. Ives CA, the DBA reports that “...it is possible that buildings on the southern edge of the developed area will be visible from the boundary of the conservation area on the north edge of St Ives Thicket” [DBA 6.2], and that “The setting of the conservation area to the north of St Ives Thicket will be changed by the Proposed Development which will introduce built development to part of the setting that was formerly agricultural” [DBA 6.4].
- 4.8 In relation to the Houghton and Wyton CA, the DBA reports that “The Proposed Development has the potential for impact on two character areas of the Houghton and Wyton Conservation Area, Houghton Hill and Thicket Road East and The Meadows” [DBA 6.5], and that “Impact on the conservation area as a result of the Proposed Development will...be confined to the boundary with Phase 1 of the Houghton Grange development” [DBA 6.6].

Year 1 Visual Effects

- 4.9 The LVA predicts that the visual effects at Y1 would be moderate adverse for two of the 14 receptor categories, minor adverse for one, negligible for one,

and neutral for the remaining 10. Table 3-9 in LVA Appendix A makes it clear that neutral essentially means “no effect”, since it results from no change.

- 4.10 This very limited range of effects, together with the absence of any effects of major magnitude - even though this relates to the worst-case scenario (winter, before landscaping has begun to take effect) - invites scrutiny. The greatest effects relate to views 5 and 6.
- 4.11 For VP5, the LVA predicts that medium sensitivity x medium change would give rise to a moderate adverse effect. However, as noted previously, footpath users could legitimately be considered to be of high sensitivity where their setting contributes to their amenity. If that were to be applied here, the effect could be categorised as major or moderate.
- 4.12 For VP6, the LVA predicts that medium sensitivity x a high degree of change would give rise to a moderate adverse effect. However, Table 3-9 in LVA Appendix A indicates that such a combination can give rise to a major or moderate effect. The “Type 4” visualization for VP6 indicates that the development would amount to a fundamental change to what is currently an open view (beyond Houghton Road), it is not clear why a major effect has not been reported in this case.
- 4.13 The visualizations for the remaining VPs indicate that vegetation would obstruct views of the development, notably from VPs 5 and 8. This rapid falling away of visibility with distance from the site is not entirely uncommon. However, due to the absence of winter views from such locations, we have no option but to take the conclusions of the LVA at face value.

Year 15 Effects

- 4.14 By Y15, the LVA predicts that the effect on LCA4 would be reduced to negligible, and that the effects on the receptor groups represented by VPs 5 and 6 would be reduced to minor adverse, with all other visual effects becoming either negligible or neutral [LVA 8.1.3.3]. This reduction in effects, typically by an order of magnitude, is a common outcome in LVA, and reflects the assumed effectiveness of the proposed landscaping in integrating the development into its landscape context and screening specific views.
- 4.15 Scrutiny of the Y15 visualizations for VPs 5 and 6, however, suggests that this assumption should not necessarily be taken at face value. In relation to VP5, the Y1 visualization clearly shows what could legitimately be regarded as a major effect, with the development closing the skyline gap between the tree-belt within the site (to the right) and the trees within the Houghton Grange site (to the left). The Y15 visualization shows this gap to remain closed, with the development likely to remain visible beyond the proposed tree planting (and probably even more so in winter). This comparison is shown in **Figure 4** below.

Figure 4: Year 1 and Year 15 Visualizations for VP5



- 4.16 In relation to VP6, the Y1 visualizations shows the open view beyond Houghton Road completely obstructed by the proposed development. This obstructing and urbanizing effect would remain at Y15, with relatively little mitigation provided by the proposed landscaping around the site entrance/Houghton Road frontage. This comparison is shown in **Figure 5** below.

Figure 5: Year 1 and Year 15 Visualizations for VP6



5. Summary and Advice to the Parish Council

Robustness of LVA and its Findings

- 5.1 The LVA is considered to be consistent with the principles of GLVIA3. However, reservations have been identified in relation to the following:
- i. Its failure to assess the effects on site character and its component landscape/perceptual attributes;
 - ii. The absence of explicit assessment of the site's representativeness of/contribution to the published LCAs;
 - iii. Its failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the site (although this is addressed in the Cultural Heritage DBA);
 - iv. Its failure to consider whether the site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB;
 - v. The absence of any finer-grained breakdown of the character effects below that of the district-level LCAs (including, for example, the character areas from the Neighbourhood Plan);
 - vi. The apparent absence of agreement of the assessment views with the LPA;
 - vii. The extent and basis for the ZTV, and the location/representativeness of some of the viewpoints, 85% of which indicate no view of the site;
 - viii. The absence of worst-case (winter) versions of the photography/visualizations;
 - ix. The need to take the reliability of the visual material as read at this stage;
 - x. Potential under-reporting of the sensitivity of some visual receptors and the magnitude of change to some views, which could influence the predicted effects; and
 - xi. Potential exaggeration of the effectiveness of the proposed mitigation.

Conclusion

- 5.2 Taking account of the above, the conclusions of the LVA should not necessarily be taken at face value, without considering the points raised in this review.
- 5.3 In particular, the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects, notably those on the most sensitive visual receptors within some of the closest-range views.
- 5.4 It is also noted that the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the LVA to overlook smaller-scale variations in effects that could be meaningful at a local level.
- 5.5 The Parish Council are advised to form their own judgments about the acceptability of the proposals in landscape and visual terms. These judgments should be informed by the factual information in the LVA and elsewhere, by the matters raised in this review, and by their own perception of the potential impacts and the effectiveness of the mitigation, within the policy framework provided by the Neighbourhood Plan.

23rd June, 2023

Peter Radmall Associates
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East Sussex RH18 5BW
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[REDACTED]

From: [REDACTED]
Sent: 22 October 2024 15:34
To: DevelopmentControl
Cc: [REDACTED]
Subject: Houghton Grange Phase 2 (23/00627/OUT)
Attachments: We sent you safe versions of your files; HDC (out) 22.10.24.pdf;
HoughtonRevisedLVAreviewOctober24FinalForSubmission[2].pdf

Categories: S [REDACTED]

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Ms Fisher,

Please see attached letter sent on behalf of our client, Houghton & Wyton Parish Council objecting the above planning application as well as an associated updated review by Peter Radmall.

Kind Regards,

[REDACTED]

[REDACTED]
Paralegal
Richard Buxton Solicitors
Dale's Brewery, Gwydir Street, Cambridge CB1 2LJ
T. [REDACTED]
E. [REDACTED]
W. [REDACTED]

Authorised and regulated by the Solicitors Regulation Authority

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

22 October 2024

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

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

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

1. We are instructed by Houghton & Wyton Parish Council and write in response to the recent consultation on updated information including a revised parameters plan (Rev 6 dated 8/8/24) and revised LVA, a Planning Statement Addendum and a Design and Access Statement (“DAS”) Addendum. According to updated information the Application continues to seek consent for up to 120 dwellings. This letter updates our objection letter sent in June 2023.
2. Our clients appreciate there has been some minor layout changes in response to points raised in their initial objection and by officers but for the reasons set out below, the Parish Council **continue to maintain an objection to the Application**.
3. The DAS addendum notes one material change in layout comprising a setback along Houghton Road to create a softer edge along Houghton Road, especially to the east of the access road. The original scheme set back built development from the road by approximately 15 metres. The revised proposals provide set-backs of between 19m and 22m to the west of the access road and between 45m and 60m to the east of the access road.
4. The Parish Council welcome this change but are disappointed that the effect of this landscape change has not translated to a modest reduction the housing numbers so that there remains overall a very dense development as explained in the updated Planning Statement: *Limitation of housing density closest to the Houghton Road site access to not more than 23 dwellings per hectare to promote a ‘village’ feel at the site entrance. The overall housing density across the housing development area is 28 dwellings per hectare.*
5. The Planning Statement addendum also explains changes to the building heights along the southern and eastern edge where concerns over coalescence arise:

Introduction of a lower maximum building height limit around the southern and eastern edges of the housing development area, reflecting the sensitivity of these locations fronting onto major open spaces. The Revised Parameter Plan shows a general maximum building height limit of 10 metres to ridgeline from finished ground level, but only 8.5 metres maximum height to ridgeline at the periphery of the housing development area.

6. However this change in height fails to address the planning harm caused by coalescence of the Parish with St Ives and remains the Parish Council's primary objection. It is a breach of the Neighbourhood Plan Policy HWNP3 – Anti-coalescence (see para 16 and discussion at paras 24-28 below and the PC's expert report on loss of separation (Peter Radmall) submitted in June 2023)
7. To be frank, the Parish Council can see no good reason (e.g., viability concerns) why the development cannot proceed with relatively minor adjustments to the quantum of new housing to protect this sensitive site and deliver the much needed housing. The intransigent stance of the Homes England in refusing to work with the Parish Council is regrettable and not in the spirit of efficient delivery of new housing into an established community - and wholly at odds with the Government's drive to bring housing forward and reflects entrenched attitudes of non-engagement. Angela Rayner would be disappointed.
8. As officers may recall as far back as January 2022 our clients sought a pre-app with officers on a reduced density scheme with a suitable settlement buffer in order to open a constructive dialogue with the Council and the applicant on how to deliver housing on the site some 30 months ago. These efforts to work together were rebuffed by the Council who refused to engage in the pre-app and not taken seriously by Homes England when the Parish Council sought discussion of their alternative scheme.

LVA review

9. Our June 2023 representations were accompanied by two reports prepared by Peter Radmall Associates (i) *Review of Applicant's Landscape and Visual Appraisal* ("**the First LVA Review**"), which identifies failings in the applicant's 2023 Landscape and Visual Appraisal ("**2023 LVA**") and (ii) the *Implications for Separation between Houghton and St Ives* ("**the Separation Report**"), which considers the Parish Council's concerns about the Development's implications for coalescence and further urbanisation.
10. Mr Radmall has now considered the updated information and the applicant's revised 2024 LVA ("**the 2024 LVA**") and his October 2024 Update Review is enclosed.
11. In summary, as we said in June 2023, the Application conflicts with both the development plan and national planning policy. Material considerations also weigh against the grant of permission. In particular:
 - (i) The Development is contrary to a number of policies of the Huntingdonshire Local Plan to 2036 ("**the Local Plan**"), the Development:
 - (a) Does not protect the character of Houghton & Wyton, contrary to Policy LP 2 – Strategy for Development;
 - (b) Does not contribute to the landscape, wildlife, cultural and historical value of the area, contrary to Policy LP 3 – Green Infrastructure;

- (c) Does not recognise the intrinsic character and beauty of the countryside, contrary to Policy LP 10 – The Countryside;
 - (d) Does not respond positively to its context and does not apply the guidance in the Huntingdonshire Landscape and Townscape Assessment (2022) (“**the HLTA 2022**”), contrary to Policy LP 11 – Design Context; and
 - (e) Does not contribute positively to the area’s character and identity or integrate with topography and landscape, contrary to Policy LP 12 – Design Implementation;
 - (f) Conflicts with the Site Allocation policy LP SI 1 (for St Ives Town) and applies the 10% tolerance found in text at D8 of the Local Plan in an arguably unlawful way by failing to adopt a masterplan at the outset and then proceeding to rely on the 10% tolerance in plan text at D8 for this Site rather than application of the tolerance across the whole SI 1 Allocation, leading to a demonstrable over-development of this Site, the remaining parcel of the SI 1 Allocation.
- (ii) The Development is contrary to the policies of the Houghton & Wyton Neighbourhood Development Plan (“**the Neighbourhood Plan**”):
- (a) the Development is outside of the Houghton & Wyton built up area and is within the open countryside and does not comply with the relevant policies for building in the countryside, contrary to Policy HWNP1 – Houghton & Wyton built up area;
 - (b) the Development does not respect the individual and distinct identities of the village of Houghton & Wyton and the town of St Ives because it individually and cumulatively results in the loss of visual and physical separation between those two settlements and would lead to their coalescence, contrary to Policy HWNP3 – Anti-coalescence.
- (iii) The Applicant’s 2024 LVA does not demonstrate that the Development complies with current 2023 Paragraph 180 of the NPPF requiring that it contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes or recognising the intrinsic character and beauty of the countryside.

The Site

12. The Site represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St. Ives and lies within the Great Ouse Valley Landscape Character Area.¹ It forms part of Local Plan allocation SI 1 St Ives West (“**the SI 1 Allocation**”),² which allows for mixed use and approximately 400 homes, 23 ha of green space and social and community facilities. The proposed Development is the last of four separate parcels to be developed on the SI 1 Allocation, the other three being: (1)

¹ defined on pg.77 of the [Huntingdonshire Landscape and Townscape SPD \(2022\)](#).

² Page 195, [Huntingdonshire Local Plan](#)

Houghton Grange Phase 1 - 107 houses, (2) The Spires - 186 houses, (3) The How - 19 houses. The Site is nevertheless to be regarded as open countryside.³

Planning policy

NPPF 180

13. Paragraph 180 of the NPPF provides that (emphasis added):

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- (a) protecting and enhancing valued landscapes [...]*
- (b) recognising the intrinsic character and beauty of the countryside [...]*

The Local Plan

14. The Local Plan was adopted in May 2019 and includes the Site as allocation SI 1, St Ives West, for the redevelopment of Houghton Grange for approximately 400 homes, 23ha of green space and social and community facilities to meet the needs arising from the development. The policy includes *inter alia* the requirement for *completion of a detailed master planning exercise to be agreed with the Council* and (g) *a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires* (emphasis added)

15. In addition, there are numerous Local Plan policies relevant to the application, and these include:

LP 2 Strategy for Development: provides that the development strategy for Huntingdonshire is to “*Protect the character of existing settlements and recognise the intrinsic character and beauty of the surrounding countryside*”.

LP 3 Green Infrastructure: states that proposals should support green infrastructure, incorporating open space and protecting and enhancing the existing network (with reference to the Cambridgeshire Strategic Green Infrastructure Network). LP3 also states that a proposal within the Ouse Valley Landscape Character Area will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area.

LP 11 Design Context: states that a proposal will be supported where it positively responds to its context and has drawn inspiration from key characteristics of the surroundings. Proposals need to apply the guidance in the Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Townscape Assessment SPD

³ Policy SI 1 provides (pg. 195) (underlining added): “Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications.”

(2007) or successor documents⁴ and applicable conservation area character statements.

LP 12 Design Implementation: states that a proposal will be supported where it contributes positively to an area's character and identity, integrating with topography and landscape

The Neighbourhood Plan

16. The Neighbourhood Plan, adopted March 2018, provides:

Policy HWNP3 – Anti-coalescence

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

The Huntingdonshire Landscape and Townscape SPD 2022 ("the HLT SPD")

17. The parish of Houghton and Wyton lies within the Great Ouse Valley landscape character area ("GOV LCA") identified in the HLT SPD, which notes that the landscape character of such parishes is derived from, and directly influenced by, the Great Ouse Valley. The HLT SPD requires:

Development proposals should:

- *Enrich the area by reinforcing its special qualities and acknowledging its distinct local character.*
- *Use appropriate building materials to retain the distinctive local character of villages.*
- *Maintain or enhance water quality and quantity and not lead to any adverse impact on flood risk or flood defences.*
- *Protect and enhance the strategic green corridor formed by the river valley, particularly where it passes through settlements.*
- *Minimise the environmental impacts of recreational activities.*
- *Protect and enhance the ecological value of the river, its margins and the valley floor.*
- *Promote opportunities for wildlife and conservation initiatives to support and enhance the area's biodiversity.*
- *Protect the setting of historic structure such as bridges and mill buildings.*
- *Encourage public access along the Great Ouse Valley through.*

Representations

18. As undeveloped land, the Site is currently regarded as open countryside⁵ and represents the last remaining parcel of open land separating the settlement edges of Houghton & Wyton and St Ives. The visual and coalescence impacts of the Development are therefore

⁴ The [Huntingdonshire Landscape and Townscape Assessment SPD \(2007\)](#) has been superseded by the [Huntingdonshire Landscape and Townscape SPD \(2022\)](#)

⁵ Policy SI 1 of the [Local Plan](#); Policy HWNP1 of the [Neighbourhood Plan](#).

of particular concern and require careful attention as required by LP SI 1(g) mentioned above.

19. Despite this, the revisions which comprise the current scheme do not adequately address a number of important issues relevant to the 2022 updated Huntingdonshire Landscape and Townscape Assessment. These are also not addressed in the 2024 LVA.

20. Mr Radmall's First LVA Review highlighted a number of serious flaws with the Applicant's 2023 LVA and its findings, including:

- (i) Failing to assess the character of the site by considering its landscape/ perceptual attributes as receptors;
- (ii) Failing to assess the site's representativeness or and contribution to published character types/ areas
- (iii) Failing to assess the site's landscape components and perceptual attributes at a local level, including with reference to the adjoining conservation areas.

21. On this basis Mr Radmall concluded that the 2023 LVA played down the severity of effects, particularly those on the most sensitive visual receptors and, that smaller-scale variations at a local level may have been overlooked. These serious failures have not been fully rectified as recorded in Mr Radmall's Update Review: -

"3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered."

22. Because the 2024 LVA fails to assess the Development's effects on site character, including its component landscape/perceptual attributes, and does not explicitly assess the site's representativeness of/contribution to the published LCAs⁶ (especially the HLT SPD 2022, which requires that development proposals should enrich the area by reinforcing its special qualities and acknowledging its distinct local character), it does not demonstrate that the Development does not conflict with the Local Plan policies identified above, or Paragraph 180(b) of the NPPF.

23. Additionally, the 2024 LVA failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the Site (Radmall Update Review paras 2.10-2.13). The 2024 LVA also fails to consider whether the Site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB (Radmall Update Review 2.14-2.17). These failures mean that it is not demonstrated that the development complies with Paragraph 180(a) of the NPPF.

24. As explained in Mr Radmall's June 2023 Separation Report, the Development would encroach into open countryside and have a further urbanising influence on the locality, contrary to Neighbourhood Plan Policy HWNP1 – Houghton & Wyton built up area, Local Plan Policy LP 10 – The Countryside, SI 1 (g) and Paragraph 174(b) of the NPPF. None of these concerns have been addressed as recorded in the Update Review:

⁶ LVA Review, section 5.

4.2 Having reviewed the 2024 LVA, and compared their respective parameter plans, I consider those conclusions to remain fundamentally valid. Unsurprisingly, the 2024 LVA makes no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives.

Anti-coalescence

25. The above failures related to the assessment of character also mean that there has not been adequate assessment taking account of the distinct identities of the village of Houghton & Wyton and the town of St Ives for the purposes of assessing compliance with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*. The Development presents very serious loss of openness of the remaining green gap between Houghton & Wyton and St Ives and would result in an increase in the actual and perceived coalescence between Houghton & Wyton and St Ives and urbanisation, such that the Development does not accord with the development principles illustrated in *Local Plan Policy SI 1* and conflicts with Neighbourhood Plan *Policy HWNP3 – Anti-coalescence*.
26. Indeed, it is apparent from the Applicant's DAS addendum that, notwithstanding the strong policy requirement to retain actual and perceived separation between Houghton & Wyton and St Ives, the Applicant has failed properly to consider the importance of avoiding coalescence between the settlements in designing its development.
27. As the 2023 Separation Report makes clear, extending built development eastward in close proximity to the main road running along the northern edge of the Site exacerbates the actual and perceived loss of separation and tightens the pinch points between the settlements in the vicinity of the water tower, which is entirely contrary to the schematic principles proposed in the LP SI 1 Allocation. Whilst the current scheme has increased the development offset from Houghton Road and infilled this with additional tree planting in order to provide greater **visual** separation, it provides no material protection of **spatial** separation, and therefore continues to contribute to increased coalescence between the settlements.
28. Indeed, it is notable that the Schematic Layout included with Policy SI 1 Allocation deliberately leaves a green buffer to the east of the water tower. The design evolution in sections 4.3-4.4 of the Addendum DAS demonstrates that, contrary to the requirements of development plan policy, none of the design options tested involved any consideration of leaving open this most sensitive area of open countryside. The proposed development has thus, from inception, been contrary to adopted development plan policy. The Applicant has simply never considered, tested or otherwise assessed a proposal which would achieve the approach mandated by development plan policy.
29. There is a ready explanation why and this is found in a flawed interpretation of the policy buffer of +/- 10% above 400 dwelling.

Flawed application of 10% tolerance (LP text D8⁷)

30. The harmful landscape impacts and loss of settlement separation is the direct consequence of the applicant's aggressive and potentially legally flawed interpretation and application of the 10% tolerance found in a text in Section D: Allocations at D8 which

⁷ D8 provides for flexibility in delivering allocations and proposes a 10% tolerance either side of the allocation figure.

Homes England has relied on to increase the number of dwellings on this Site, and the failure early to adopt a Masterplan for the whole of the whole of the SI 1 Allocation.

31. These concerns have been raised in correspondence with Homes England multiple times and Homes England have failed repeatedly to engage with the Parish Council on a way forward for successful development of the Site. It has latched on to the figure of 120 dwellings and not budged. To be clear 120 dwellings eats into the plus 10% and causes material planning harm.
32. The material planning harm arising from the Application arises from two inter-related material failures early on in the commencement of the development of the SI 1 Allocation:
 - (1) The first is HE's failure to agree with adjoining landowners and submit for approval a masterplan for the entire SI 1 Allocation before approvals in 2021-2022 for the Grange Phase 1 and the How (19/01180/REM and 19/02280/FUL respectively), as required by the policy. This was a critical requirement in the policy that was never achieved.
 - (2) The second is that Homes England has adopted an arguably flawed legal interpretation of an application of the 10% tolerance found in text at D8 which results in overdevelopment of this Site, the last parcel that comprises the SI 1 Allocation.
33. ***Had a masterplan been in place as required by SI 1 (a) to guide development across the SI 1 Allocation, it would have been possible to decide at the outset whether and how best to use the 10% tolerance across the SI 1 Allocation and in accordance with the indicative layout in policy SI 1.***
34. As matters stand, there was no agreement through the masterplan process on how to allocate the 10% tolerance, and now Homes England is seeking to take advantage of the entire 10% tolerance which applies for the whole allocation of 400 dwellings on this Site, despite the Site being the last remaining (and arguably most sensitive) parcel of undeveloped land within the SI 1 Allocation.
35. In other words, the Applicant's approach is to seek to rely on the fact that it did not include the relevant pro rata of the 10% tolerance on any of the other three parcels which comprise the SI 1 Allocation as a justification for an excess of new dwellings well in excess of 10% on the last Site's capacity. This is a fundamentally flawed policy interpretation and application of policy resulting in material planning harm, namely breaches of anti-coalescence objectives in policies in the District Local Plan and the Houghton & Wyton Neighbourhood Plan (P1 and P3). If the current revised parameter plan is approved without the changes they seek to address their concerns, the Parish Council are prepared to test these policies and the erroneous approach to the 'tolerance' through the courts. For this purpose, and reluctantly, the Parish Council have already retained Counsel, Charles Streeten of Francis Taylor Building, in anticipation of any litigation.
36. To reiterate, as has been made clear in meeting with Homes England and the Council officers, the Parish Council can and would support a scheme with modest changes to the two aspects including to the north of Site, which at present presents a hard and overdeveloped edge. They advocated for the Site frontage pulled back from Houghton Road to introduce a softer landscaped edge to the access into the Development, as shown in the indicative plan to the SI 1 Allocation. This will help to define a clear division between Houghton & Wyton from the town of St Ives. This separation would also improve the amenity for these edge-facing houses otherwise adversely impacted by the traffic on Houghton Road.

37. The second change that the Parish Council has long requested is regarding the footprint of the development to reduce the spread of the eastern edge so as to reduce the overall developed area to provide a landscape buffer which separates the parish from St. Ives. This has not changed to reduce the loss of spatial separation as explained in the Peter Radmall report.
38. These changes are economically viable. FOI correspondence with Homes England confirms that there is no commercial necessity for the proposed quantum of housing on this Site, the last parcel of the SI 1 Allocation in the Local Plan 2019. FOI references RFI3582 and RFI13408 reveal that the total Homes England site was valued at £7.2m, with Houghton Grange Phase 1/Morris Homes sold for 4.6m, hence leaving a residual value for the Site of £2.6m.
39. It has not been possible to access the planning portal to review updated information from the County Council on Highways. The issues occurred on 22 October and have been reported to Development Control. Once we are able to review the new information we will write separately if necessary.

Conclusion

40. For the reasons detailed by Mr Radmall in the Update Review, there are deficiencies in the Applicant's 2024 LVA such that its conclusions cannot be relied upon and the Development conflicts with policy on landscape.
41. Furthermore, as confirmed by the findings in the Parish Council's Separation Report, the Development has implications for coalescence, urbanisation and impacts on openness such that it conflicts with the policies identified above.
42. For the reasons set out above, **the Application should be Refused.**

Yours faithfully

A black rectangular box redacting the signature of the solicitor.

RICHARD BUXTON SOLICITORS

**Proposed Residential Development on
Land between Houghton Grange and The How**

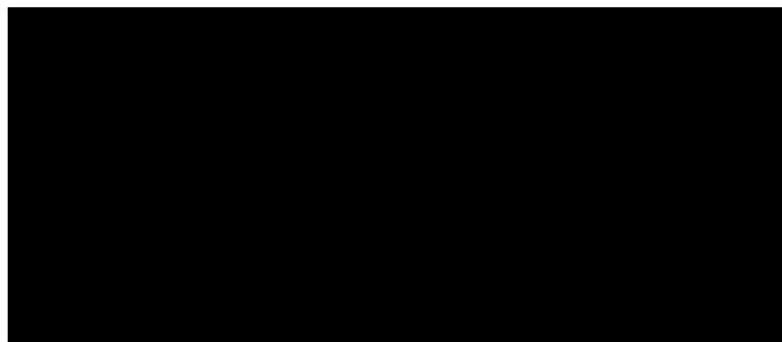
Houghton Road, Houghton
Application Ref: 23/00627/OUT

**REVIEW OF APPLICANT'S
REVISED LVA**

on behalf of

Houghton and Wyton Parish Council

October 2024



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EXECUTIVE SUMMARY

1. This report, issued on behalf of Houghton & Wyton Parish Council, comprises a review of the applicant's Revised Landscape and Visual Appraisal (LVA) issued in September 2024.
2. It assesses the degree to which the Revised LVA has responded to the concerns raised in the First LVA Review carried out in June 2023. It also comments on any implications for separation between the village and St. Ives, which is a key concern of the Council and the subject of a separate report issued at the same time as the First LVA Review.
3. Of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three have been partially addressed, and the remaining four have received no response.
4. As a result, concerns remain in relation to the following:
 - The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley;
 - The LVA's focus on published character areas, at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
 - Unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the settlements.
5. As a result, the proposed development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.
6. In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a reliable basis for determination.
7. For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.

1. Introduction

- 1.1 Peter Radmall Associates (PRA) were commissioned by Houghton and Wyton Parish Council in June 2023 to consider the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT). This took the form of a review of the landscape and visual appraisal (LVA) issued by AECOM in March 2023. I refer to these as the **2023 LVA** and the **First LVA Review**.
- 1.2 At the same time (June 2023), I produced a **Separation Report**, which considered the Implications for Separation between Houghton and St Ives, one of the key concerns of the Parish Council.
- 1.3 In response to comments from Huntingdonshire District Council (HDC) and other consultees, together with changes to the scheme parameters and some policy and published character references, a revised LVA was issued in September 2024 (**the 2024 LVA**).
- 1.4 This document reviews the 2024 LVA, advises on whether the areas of potential concern identified in the first LVA review have been addressed, and comments on the degree of reliance that can be placed upon it. I refer to it as the **Second LVA Review**.
- 1.5 This review has been based on a desktop study only – as agreed with the Parish Council, a site visit to the two additional viewpoints addressed in the 2024 LVA has not been considered necessary. The same limitations apply as for the First LVA Review, which are as follows:
 - It does not purport to be an LVA/LVIA in its own right, and therefore does not attempt to identify and categorise all the potential effects;
 - It has not included a detailed technical audit of the photographic and visualization material, which has been taken as read;
 - It relies on the original fieldwork, which was confined to publicly-accessible locations, and visits to selected viewpoints;
 - It has not considered the status of, or the weight to be given to, relevant policy; and
 - Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

2. Response to First LVA Review Concerns

2.1 The First LVA Review assessed the 2023 LVA against a checklist of compliance with good practice, from which it identified a number of matters of potential concern. These may be summarized as follows:

- i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;
- ii. The site's representativeness of/contribution to the published LCAs has not been assessed;
- iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors;
- iv. There has been no explicit consideration of whether the site may form part of a valued landscape;
- v. The assessment views do not appear to have been agreed with the LPA;
- vi. The location/representativeness of some of the viewpoints may be questioned – the Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered;
- vii. Seasonal influences on visibility and effects are not evident from the photography/visualizations;
- viii. The reliability of the visual material has been taken as read rather than subject to a technical audit; and
- ix. The sensitivity of some visual receptors appears to have been understated.

2.2 In addition, the Visual Assessment part of the review raised a number of subsidiary matters such as the ZTV and viewpoints. I have therefore added these to produce a consolidated list of matters against which to review the 2024 LVA.

2.3 The Second LVA Review is reported in the remainder of this section. For each matter of concern, explanatory text from the First LVA Review is provided, followed by a comment on the completeness of the response provided in the 2024 LVA, using the following descriptive scale:

- FULL: The matter has been fully addressed;
- NONE: No explicit response has been provided; or

- PARTIAL: Whilst some response has been provided, queries or uncertainties remain.

i. Assessment of the Site and its Component/Perceptual Attributes as a Landscape Receptor

2.4 GLVIA3 advises that *"The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected..., often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects."* [GLVIA3, 5.34 bullet 1].

2.5 The 2023 LVA did not follow this approach, identifying only the district-wide landscape character areas (LCAs) as receptors. Whilst the 2024 LVA also considers the townscape character areas (CAs) within St. Ives, it fails to consider individual landscape components and perceptual factors (e.g. pastoral land, openness). As a result, the 2024 LVA perpetuates this omission. Response to First LVA Review: **NONE**.

ii. The site's representativeness of/contribution to the published LCAs has not been assessed

2.6 The 2023 LVA included no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs. It was therefore difficult to understand how it had arrived at its assessment of effects on them.

2.7 The 2024 LVA has updated the baseline LCAs in accordance with the Huntingdonshire Landscape and Townscape SPD, 2022, and includes new descriptions of the relevant St. Ives character areas [Ref 2024 LVA 5.2.3.2].

2.8 The site is located within the Western Periphery (Townscape) Character Area, and the Great Ouse Valley LCA, which are assessed as being of Medium and High sensitivity respectively. There is still, however, no explicit reference to the degree to which the characteristics of the site contribute to/detract from this CA/LCA, and therefore to how the development's impact on them has been derived. Response to First LVA Review: **PARTIAL**.

iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors

2.9 Whilst conservation areas are primarily heritage designations, they often have landscape (or townscape) implications, particularly where they may include greenfield land and/or possess a wider setting (which is the case here). Their conservation status suggests that they should be regarded as being of high landscape/townscape sensitivity.

- 2.10 The First LVA review noted that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The 2023 LVA did not assess whether there would be any effects on the character or setting of either CA.
- 2.11 The 2024 LVA also contains no such assessment (or cross-reference to a Heritage Statement or similar). However, effects on these CAs, and their settings, are reported in the Cultural Heritage Desk-Based Assessment (DBA, AECOM, December 2021). Whilst it is reasonable that a parallel assessment within the LVA has not been provided, an explicit reference to the DBA – and in particular to how it has influenced landscape value – would have been useful. Response to First LVA Review: **NONE**.
- iv. There has been no explicit consideration of whether the site may form part of a valued landscape¹
- 2.12 The First LVIA Review pointed out that the south-western part of the site falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton Conservation Area. Its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.
- 2.13 The site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB, now National Landscape). The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.
- 2.14 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site may contribute to that value. This possibility was not acknowledged in the 2023 LVA, although the Great Ouse Valley LCA is considered to be of high sensitivity. Such an acknowledgement is also absent from the 2024 LVA. Response to First LVA Review: **NONE**.
- v. The assessment views do not appear to have been agreed with the LPA
- 2.15 The 2024 LVA confirms that this agreement was secured in December 2020 [Ref 2024 LVA 6.1.1]. Response to First LVA Review: **FULL**.
- vi. In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional

¹ As per NPPF180(a)

viewpoints looking towards the site from both directions along Houghton Road would have been helpful

- 2.16 No additional views in this location have been added for the 2024 LVA. However, additional viewpoints requested by HDC (3a and 18) have been added, together with two longer-distance views from the south-east (21/22). Response to First LVA Review: **PARTIAL**.

vii. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.

- 2.17 The request for longer-distance views from the south/south-east has been addressed in the 2024 LVA by the addition of VPs 21/22. No additional short-range views have been provided. Response to First LVA Review: **PARTIAL**.

viii. The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4m in height, but their ZTVs typically extend to 5km)

- 2.18 The ZTV has been extended to 5km for the 2024 LVA [Ref 2024 LVA Figures 4a/5a]. Response to First LVA Review: **FULL**.

ix. Winter and summer photography should have been provided for each viewpoint

- 2.19 The First LVA Review commented that, whilst the 2023 LVA allowed for variations in effects between summer and winter conditions, these were not evident in the photography and visualizations, which only showed the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability.

- 2.20 The 2024 LVA has responded as follows [Ref 2024 LVA 1.3]: "Winter photography was captured in January 2024 from the 20 viewpoints. This was as closely matched to the summer photography as practical. Baseline summer and winter photography have both been accurately annotated to show the horizontal site extents in the views, based on the 3d model of the main development area. This has been reviewed and updated for the summer photography, which was previously annotated based on approximate development extents." Response to First LVA Review: **FULL**.

x. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable

- 2.21 The First LVA Review commented that, of the six receptor groups comprising users of PROWs or public access land, three are of medium sensitivity and three

are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that “*visual receptors most susceptible to change are...likely to include...residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way...*”.

- 2.22 There has been no change to 2024 LVA Appendix A: Methodology in relation to the sensitivity of visual receptors. As a result, potential concerns over the reliability of the 2024 LVA remain in relation to visual impacts. Response to First LVA Review: **NONE**.

Summary of LVA Response

- 2.23 Of the ten matters highlighted in the First Review, three have received a full response in the 2024 LVA, four have received no explicit response, and the remaining three have received a partial response. Those for which a full response has been provided relate to the agreement of viewpoint locations, the extension of the ZTV to 5km and the provision of summer/winter photography.
- 2.24 Two of the matters to which partial responses have been provided relate to the inclusion of additional viewpoints in the 2024 LVA. These comprise the two viewpoints requested by HDC, and two longer-distance viewpoints to the south/south-east that reflect the extended ZTV. No additional close-range viewpoints, as requested by the Parish Council, have been provided.
- 2.25 Notably, there has been no explicit response to the matters relating to the assessment of site character and its component attributes, its contribution to the published LCAs/CAs, the Conservation Areas or sensitive visual receptors. Neither has any explanation been provided as to the reason for this absence. It seems likely, however, that the consultation comments from HDC have been prioritised, together with more obviously technical matters, whilst those which challenge the judgmental basis for the LVA have remained unanswered.

3. Implications for the Reliability of the 2024 LVA

- 3.1 My advice to the Parish Council from the First Review was that *"...the conclusions of the [2023] LVA should not necessarily be taken at face value, without considering the points raised in this review"*.
- 3.2 In particular, I advised that *"...the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects, notably those on the most sensitive visual receptors within some of the closest-range views"*.
- 3.3 I also noted that *"...the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the [2023] LVA to overlook smaller-scale variations in effects that could be meaningful at a local level."*
- 3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered.
- 3.5 One final comment should be made about the reliability of the 2024 LVA. Section 1.3 of the 2024 LVA, bullet 1, states the following:
- The Parameter Plan has been updated. This Revised LVA considers the parameter plan shown in Appendix B (dated 06/11/23). The plan has been amended since (Rev 06, dated 08/08/2024), which includes a greater set-back of development from Houghton Road, with significantly more tree planting between built development and Houghton Road than is considered in this Revised LVA*
- 3.6 For reference purposes, the parameter plan from revised LVA Appendix B is reproduced in **Figure 3.1**. The original version should be accessed for greater legibility, reference to the key etc.
- 3.7 For comparison, the parameter plan from the 2024 LVA review is shown in **Figure 3.2**.

Figure 3.1: Parameter Plan from 2024 LVA Appendix B



Figure 3.2: Parameter Plan from 2023 LVA Review



- 3.8 Even allowing for slight disparities in scale (due to both images having been copied as screen-shots), material differences between them are not readily visible. Whilst the proposed development area has not changed, the most obvious difference of relevance to this discussion is the introduction of a peripheral zone within which the height parameters have been adjusted downwards (from 10m to 8.5m), in response to comments from HDC's urban design officer.
- 3.9 However, as the text from the 2024 LVA 1.3 points out, the parameter plan shown in Figure 3.1 is not the latest version. This plan was updated in August 2024 to show a greater offset of development from Houghton Road, together with more tree planting. These changes are not reflected in the 2024 LVA, which therefore may not provide the complete information required before the application can be reliably determined.

4. Implications for Separation between Houghton + Wyton and St. Ives

4.1 As noted above, in June 2023, alongside my First LVA Review, I produced a report on the development's "*Implications for Separation between Houghton and St. Ives*". The Summary and Conclusion of this report was as follows:

- The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road.
- The majority of the site retains a greenfield character that reinforces its role as part of the open countryside.
- Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).
- The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road.
- This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.
- The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires.
- This openness is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.
- Although development would occupy only c22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road.
- As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.
- The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west.

- The visualizations in the 2023 LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.
- The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins.
- This is clearly contrary to NP Policy 3, and is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.
- The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b)².
- The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.

4.2 Having reviewed the 2024 LVA, and compared their respective parameter plans, I consider those conclusions to remain fundamentally valid. Unsurprisingly, the 2024 LVA makes no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives.

4.3 However, the 2024 LVA does assess the development's impact on the St. Ives urban character areas (CAs), of which the Western Periphery CA - in which the site is located – is most relevant. This is shown as the green-shaded area on **Figure 4.1**.

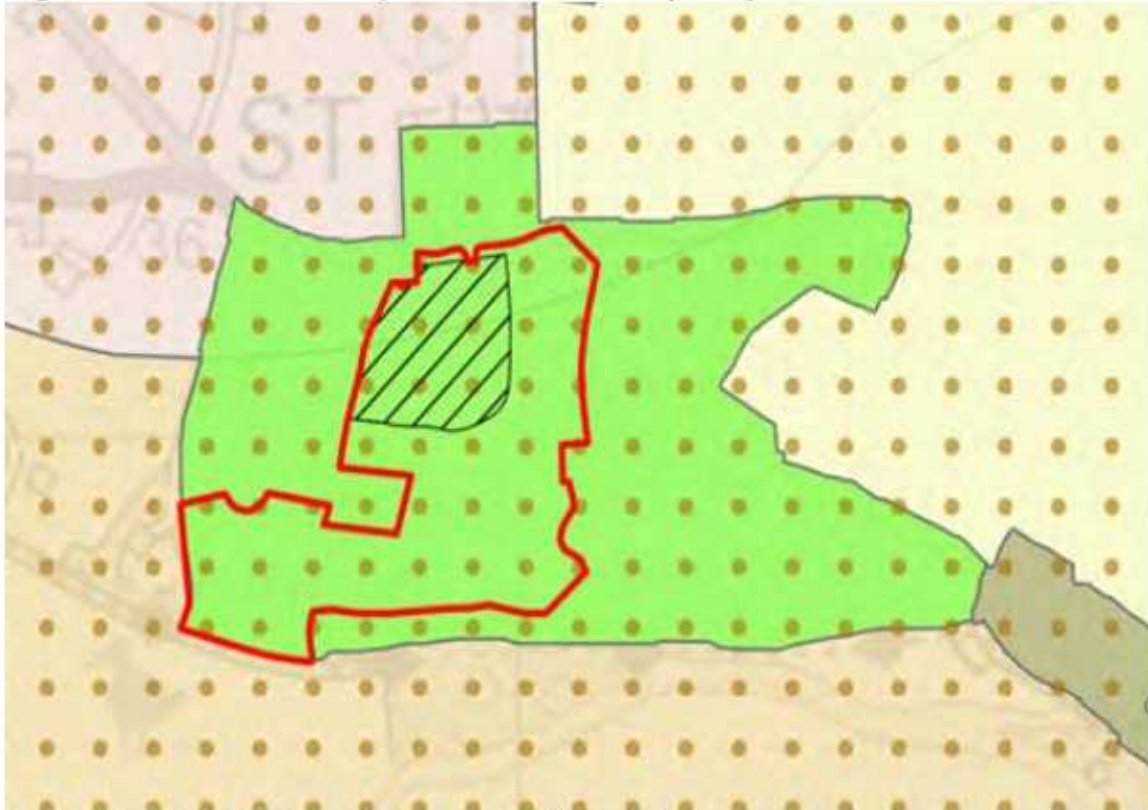
4.4 As its name suggests, this CA forms the western fringe of the town, comprising a combination of built-up areas (Garnier Drive and The Spires), mature tree belts and open grassland. The area's association with the Great Ouse Valley, the Thicket Path and the Houghton and Wyton conservation area is acknowledged in the revised LVA to be of "increased local value".

4.5 Overall, the Western Periphery CA is considered in the revised LVA to be of Medium value and Low susceptibility, giving rise to Medium sensitivity [Ref 2024 LVA, Table 5.2.1-1]. As can be seen from Figure 4.1, the proposed scheme would introduce a cluster of built development up to 10m high onto the central/northern part of the site, which is currently open land. This is

² Now NPPF180(b)

considered in the 2024 LVA to amount to a Low magnitude of change, which in combination with Medium sensitivity gives rise to a Minor Adverse effect at Year 1 [Ref 2024 LVA 9.1.2.3].

Figure 4.1: Relationship to Western Periphery Character Area



Extracted from 2024 LVA Appendix B, Figure 3: Published Character Areas

- 4.6 In my opinion, the predicted Minor Adverse effect under-states both the susceptibility to change of the green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. Comparison of Figures 3.1 and 3.2 indicates that there has been no material reduction in this degree of encroachment as the masterplan has evolved, which cannot reasonably be described as a "slight alteration" to the CA [Ref 2024 LVA 9.1.2.1].
- 4.7 The 2024 LVA refers to the retention of a "green wedge of open space" between the development and The Spires. As pointed out in the conclusion to the original LVA review, however, the width of the east/west green gap between Houghton & Wyton and St. Ives (which falls within this CA) would be reduced by about two-thirds. The peripheral and transitional character of the CA – and thereby its contribution to separation between the settlements – would be further eroded by the urbanizing effect of the proposal.

5. Summary

- 5.1 This review of the Revised LVA concludes that, of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three more have been partially addressed, and the remaining four have received no response.
- 5.2 Concerns remain in particular that:
- The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley, may have been under-stated;
 - The LVA's focus on published character areas has been at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
 - There are unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the village and St. Ives has not been recognized.
- 5.3 As a result, the LVA may have understated some of the predicted effects, including the degree to which the development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.
- 5.4 In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a wholly reliable basis for determination.
- 5.5 For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.

From: DevelopmentControl
Sent: 28 February 2025 17:01
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Categories: [REDACTED]

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 28/02/2025 5:00 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	<p>Houghton & Wyton Parish Council recommend that these applications be REFUSED for the following reasons: Please see the response submitted on behalf of the Parish Council by Richard Buxton Solicitors. See also the full submission sent to DMAAdmin and [REDACTED] on 28 Feb 2025 A review of the Landscape Visual Assessment by Peter Radmall Associates is attached and forms a material part of this comment. We would like to particularly point out</p> <p>1. The amended proposal fails to grasp that this development is attached to Houghton Grange Phase 1 - an extension of Houghton & Wyton, a village rather than the Town of St.Ives itself. And if approved without further amendments will result in planning harm by linking the two</p>

distinctly different settlements.

The proposed development is still located too close to the main road, harming the entrance/exit to the village and green gateway to the town.

By infilling the land between the entrance road and A1123 the proposal does not correspond with the Local Plan policy illustration of what is considered acceptable, all of which increases the actual and perceived sense of coalescence.

Homes England appear to reach the same conclusion when stating and admitting that when viewed from the A1123 the development 'would cause a pronounced change to the composition of the view'(section 9.1.3.2 Year 15 Visual Effects) and in the Revised Landscape and Visual Appraisal, that 'it would appear integrated into the settlement edge of St Ives.' in other words it would be seen as part of the town (9.1.3.1 Year 15 effects to Published Landscape Character Areas).

This concurs with [REDACTED], our own Landscape Assessor's view that it "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 28 February 2025 16:57
To: DMAdmin; Laura Fisher
Cc: [REDACTED]
Subject: Planning Application 23/00627/OUT Land between Houghton Grange and The How, Houghton Road, Houghton
Attachments: We sent you safe versions of your files; 2300627OUT Richard Buxton letter H&WPC 28022025.pdf; 2300627OUT Peter Radmall February 2025 LVA review (1).pdf; Houghton & Wyton reponse to 2300627OUT 28022025.pdf

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Please see the response from Houghton and Wyton Parish Council in respect of the application Ref 23/00627/OUT.

Please also refer to the submission from Richard Buxton Solicitors on our behalf, which is also attached for your reference.

Regards

[REDACTED]
Clerk to Houghton & Wyton Parish Council
[REDACTED]

www.houghtonwytonpc.co.uk

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

Attn: Laura Fisher, Case Officer

28 February 2025

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

Houghton & Wyton Parish Council recommend that these applications be **REFUSED** for the following reasons:

Please see the response submitted on behalf of the Parish Council by [REDACTED] Buxton Solicitors.

A review of the Landscape Visual Assessment by Peter Radmall Associates is attached and forms a material part of this comment. We would like to particularly point out

1. The amended proposal fails to grasp that this development is attached to Houghton Grange Phase 1 - an extension of Houghton & Wyton, a village rather than the Town of St.Ives itself. And if approved without further amendments will result in planning harm by linking the two distinctly different settlements.

The proposed development is still located too close to the main road, harming the entrance/exit to the village and green gateway to the town.

By infilling the land between the entrance road and A1123 the proposal does not correspond with the Local Plan policy illustration of what is considered acceptable, all of which increases the actual and perceived sense of coalescence.

Homes England appear to reach the same conclusion when stating and admitting that when viewed from the A1123 the development 'would cause a pronounced change to the composition of the view' (section 9.1.3.2 Year 15 Visual Effects) and in the Revised Landscape and Visual



Appraisal, that 'it would appear integrated into the settlement edge of St Ives.' in other words it would be seen as part of the town (9.1.3.1 Year 15 effects to Published Landscape Character Areas).

This concurs with Peter Radmall, our own Landscape Assessor's view that it "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".

This is not an outcome which either the Local Plan Policy SI 1 or HWNP 3 Anti- Coalescence Policy can support, and would result in planning harm.

The proposal squeezes the gap by two thirds alongside the road, and at its narrowest point by 69%, that is even before the reducing effects of the proposed new play area and associated pathways are taken into account which all has the effect of urbanising the area and joining the settlements (see below).

2. To this latter point, Homes England describe what is left of the gap as a natural green wedge. However they have failed to appreciate that the effectiveness and naturalness of it would be squeezed and reduced further by a built and equipped play area proposed to the east and positioned outside of the developed footprint i.e. within the gap/green wedge. Plus by adding numerous built pathways connecting and crossing the meadow to the town, together with the management of the area it will have a huge urbanising effect on what is supposed to be a natural countryside buffer. This is critical if any gap is to help distinguish between and reinforce the separate identities of the village and town. The Anti-coalescence policies in the relevant Neighbourhood (HWNP 3) and Local Plans (SI 1) form a vital part of the planning policy for this area and once again, do not support this approach and the planning harm that would result.
3. The proposed density of housing, in what is repeatedly acknowledged within Local Plan SI, to be a sensitive area is incongruous with both Houghton Grange phase 1, as well as the rest of the village. In fact the density would be considered quite high were it to form the edge of a town let alone the edge of a village.

Continuing to maintain a total build of 120 homes would result in parts of the site having a built density of 33 dwellings per hectare (dph) which is far too intensive for the location. It would represent more than twice the density of the Houghton Grange Phase 1 site (16 dph) immediately next door and currently forming the edge of the village. In fact the proposal would result in an even higher density than for the Spires site (26 dph) on the edge of St.Ives. Replicating the Spires development for Houghton



Grange Phase 2 would only enhance the perception of coalescence as it will look, feel and actually become viewed as an extension of the Spires and therefore the town itself.

In our opinion, continuing to push for the +10% tolerance of the entire St.Ives west housing allocation to be built in this one remaining parcel of land between village and town shows a disregard for the guiding planning policies, the sensitivity of the location, the environment, the views of local people as well as design guidance. Even in the recent Local Plan Land Availability Assessment, a maximum housing density of 25 dph was used to help determine the housing potential of new sites on the edge of existing settlements.

4. Finally, it is felt that the tone of the application takes no account of local considerations from this parish and neighbouring councils.
We remain concerned that a single planning application should have taken over two years to get to this stage, to still be unresolved with so many questions surrounding it. To have been submitted with missing or out of date information supplied, with inadequate levels of engagement, requiring substantial amendments and resubmissions, having three separate consultations of varying sorts, resulting in nearly 270 documents and postings on line, and thousands of pounds of tax payers money being spent on professional help to support, hopefully to ensure planning policies are adhered to and a positive outcome for all achieved.

We sincerely hope that lessons can be learned from this for the future.

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

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

28th February 2025

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

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

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

1. We are instructed by Houghton & Wyton Parish Council and write following our previous correspondence and in response to updated information including a revised parameters plan (Rev 7 dated 19/12/24), revised LVA and revised D&A Addendum Statement issued in January 2025. These revisions are the third set of revised documents and follow a previous set of revisions published in September/October 2024. According to updated information the Application continues to seek consent for up to 120 dwellings. This letter updates our objection letter sent 22nd October 2024.
2. We enclose our October 2024 letter for ease of reference and ask that the two be read jointly as the former, for example, raises concerns as to the contents of the planning statement addendum, which has not been updated since October 2024. As such, this letter is to comment on the updated LVA and parameters plan and to update our position regarding it. We also include a short note regarding the D&A Addendum Statement.
3. Overall, while our clients appreciate that some points raised in October correspondence have now been addressed in the revised LVA. For example, consideration of the updated parameter plans available at the time of drafting. For the reasons set out below, the Parish Council **continues to maintain an objection to the Application.**

LVA review

4. Our June 2023 representations were accompanied by two reports prepared by Peter Radmall Associates (i) *Review of Applicant's Landscape and Visual Appraisal* (“**the First LVA Review**”), which identifies failings in the applicant's 2023 Landscape and Visual Appraisal (“**2023 LVA**”) and (ii) the *Implications for Separation between Houghton and St Ives* (“**the Separation Report**”), which considers the Parish Council's concerns about the Development's implications for coalescence and further urbanisation.

5. Our October 2024 representations were accompanied by a further report by Mr Radmall, *Review of Applicant's Revised LVA* ("**the Second LVA Review**") which considered the updated information and the applicant's revised 2024 LVA ("**the 2024 LVA**"). This report continued to conclude that the proposed development "would increase the actual and perceived coalescence between Houghton & Wyton and St Ives".
6. Mr Radmall has now considered the updated information, including the updated parameter plan (Rev 7, published December 2024) and the applicant's revised 2025 LVA ("**the 2025 LVA**") and his February 2025 Update Review is enclosed with this letter.
7. Mr Radmall's report begins with consideration of the updated Rev 7 parameter plan as published in December 2024 ultimately concluding that *the fundamental parameters of the development remain* as set out in earlier revisions.
8. However, the report also notes that the most significant change to the parameter plan has occurred in the character of the green corridor with the introduction of a children's play area and additional paths. This would result in the existing rural appearance of the meadowland taking on a more suburban character. As such, there would be a reduction in separating function of the site as a green space to a material degree both spatially and visually meaning there would be little perceived break in the westward extension of the urban fringe of St Ives along the southern side of Houghton Road.
9. The report then continued to consider and advise on whether the areas of concern as identified in the second LVA review had been addressed and to comment on the degree of reliance that can be placed upon the latest version of the LVA.
10. The Second LVA Review, raised eight remaining concerns on behalf of the Parish Council in reference to the 2024 LVA. Mr Radmall considered all eight and found that six have not been addressed in the 2025 LVA, one had been partially addressed and one had been fully addressed.
11. The six concerns that remain as unaddressed are as follows.
 - (i) *The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes* – the 2025 LVA continues to subsume these attributes within the LVA focus on published LCAs and CAs.
 - (ii) *The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed*- the 2025 LVA makes no comment as the degree to which the site contributes or detracts from these areas, specifically in relation to the physical and perceived separation between St Ives and Houghton.
 - (iii) *Conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors* – The conservation areas continued to not be identified as landscape receptors in the 2025 LVA.
 - (iv) *There was no explicit consideration of whether the site may form part of a valued landscape* – The 2025 LVA does not include this consideration despite the Great Ouse Valley LCA being categorised as high value.

- (v) *In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful – There have been no additional viewpoints included in the 2025 LVA.*
 - (vi) *The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered – No additional viewpoints have been considered in the 2025 LVA.*
12. The 2025 LVA, however, has partially addressed one concern as raised in October 2024 Review which stated that *Discrepancies in sensitivity between the same categories of visual receptors are not readily explicable*. Mr Radmall identifies that *Table 6.2.1-1 sets out how the sensitivity of specific receptors has been derived. In some cases, this sensitivity is readily understood (e.g. people walking across Houghton and Hemingford Meadows). Elsewhere, however, it is not clear why the sensitivity of intrinsically sensitive receptors such as residents appears to have been downgraded. There is a risk that viewing opportunity may have been confused with susceptibility, resulting in double-counting.*
 13. The final concern as raised in the October 2024 was that the LVA does not assess the latest version of the parameter plan. However, this has been fully addressed as the LVA assesses the December 2024 parameter plan, as described in LVA Section 7, updated Figure 6 and the updated Type 4 visualisations.
 14. In his conclusions, Mr Radmall states that *no explicit response has been made to most of the concerns remaining from the Second LVA Review. This should be noted by the Parish Council and by district councillors when they come to determine the application.*
 15. Finally, a key concern throughout the Parish Council's objections has been the impact of the Development on the separation between Houghton & Wyton and St Ives. When considering the 2025 LVA, Mr Radmall states that *In my opinion, the predicted Minor Adverse effect [as attributed to the proposed development] under-states both the susceptibility to change of the residual green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. This encroachment is described in the LVA [ref 9.1.2.1] as a "slight alteration to a limited part of the CA". Whilst this may be the case spatially, it is unlikely to be the experience perceptually.*
 16. In particular, the updated review notes that there would be a reduction in open green space by about two-thirds. This, when combined with the increased suburbanising character outlined in the December 2024 parameter plan would further erode the separation between the settlements of Houghton & Wyton and St Ives.
 17. Indeed, this erosion has now been noted within the 2025 LVA itself at 9.1.3.1 which notes that by year 15 of operation the proposed development *would appear integrated into the settlement edge of St Ives* and at 9.1.3.2 states that at year 15 of operation the development when viewed from the residential properties on Garner Drive *would cause a noticeable change to the composition of the view.*

Housing Density

18. Separately to Mr Radmall's report, we would also like to draw attention to the fact that the updated D&A Addendum Statement notes an increased housing density of approximately 30 dwellings per hectare, with a maximum of 33 dwellings per hectare. This is in stark contrast to other developments within the SI 1 Allocation such as Houghton Grange Phase 1 which sits at 16 dwellings per hectare and the Spires at 26 dwellings per hectare. As such, this development is in stark contrast to existing developments and stands to change the character of the site.

Conclusion

19. For the reasons detailed by Mr Radmall in the 2025 Update Review, there are deficiencies in the Applicant's 2025 LVA such that its conclusions cannot be relied upon.

20. For the avoidance of doubt, our consistent objection remains the lack of openness between the proposed development and the existing settlements of Houghton & Wyton and St Ives. The revisions in the 2025 LVA do nothing to mitigate these concerns and in fact the revisions to the 2024 parameter plan have a suburbanising effect which creates further harm to reduce the existing gap.

21. Therefore, for the reasons set out above and our enclosed October 2024 objection, **the Application should be Refused.**

Yours faithfully



RICHARD BUXTON SOLICITORS

Proposed Residential Development on Land between Houghton Grange and The How

Houghton Road, Houghton
Application Ref: 23/00627/OUT

REVIEW OF JANUARY 2025 LANDSCAPE AND VISUAL APPRAISAL (LVA)

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Houghton and Wyton Parish Council

February 2025

Peter Radmall Associates
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FIGURES

- 2.1 Updated Parameter Plan
- 2.2 Previous Version of Parameter Plan

EXECUTIVE SUMMARY

1. This report, issued on behalf of Houghton & Wyton Parish Council, comprises a review of the applicant's Third Revised Landscape and Visual Appraisal (LVA) issued in January 2025. It is referred to as the Third LVA Review, and assesses the degree to which the current LVA has responded to the concerns raised in the Second LVA Review carried out in October 2024.
2. It begins by commenting on the implications of the latest (December 2024) parameter plan for separation between the village and St. Ives. This is a key concern for the Parish Council and was the subject of a separate report issued on their behalf at the same time as our First LVA review.
3. The Second LVA Review found that three concerns had been only partially addressed, and four concerns had received no explicit response, in the previous version of the LVA. As a result, concerns remained in relation to the following:
 - The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley;
 - The LVA's focus on published character areas, at the expense of landscape components and perceptual attributes such as openness;
 - Unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the settlements.
5. In addition, the Second LVA Review highlighted the fact that the LVA had not assessed the latest version of the parameter plan at that time, which cast doubt on its reliability. This has now been rectified in the current LVA.
6. The latest parameter plan confirms the spatial and visual implications of the development for the residual green corridor that would remain to the east of the main developed area. Not only would this now account for only about one third of the width of the site, but it would acquire a suburban character as recreational space.
7. None of the remaining matters identified in the Second LVA Review have explicitly been addressed. The associated implications for the reliability of the LVA and for separation between Houghton and St. Ives also remain.

1. Introduction

- 1.1 Peter Radmall Associates (PRA) were commissioned by Houghton and Wyton Parish Council in June 2023 to consider the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT).
- 1.2 This took the form of a review of the landscape and visual appraisal (LVA) issued by AECOM in March 2023. These documents are referred to as the **2023 LVA** and the **First LVA Review**.
- 1.3 At the same time (June 2023), PRA produced a **Separation Report**, which considered the Implications for Separation between Houghton and St Ives, one of the key concerns of the Parish Council.
- 1.4 In response to comments from Huntingdonshire District Council (HDC) and other consultees, together with changes to the scheme parameters and some policy and published character references, a revised LVA was issued in September 2024 (**the 2024 LVA**). This was reviewed in the **Second LVA Review**, issued in October 2024.
- 1.5 The applicant has since issued (in January 2025) a further updated version of the LVA, which is reviewed in Section 3 of this document, referred to as the **Third LVA Review**. Its main purpose is to advise on whether the areas of potential concern identified in the second LVA review have been addressed, and to comment on the degree of reliance that can be placed upon the latest version of the LVA.
- 1.6 This is preceded (in Section 2) by a review of the latest (December 2024) parameter plan, with a commentary on its implications for separation between Houghton and St. Ives.
- 1.7 As with the previous (Second) LVA review, this document has been based on a desktop study only. The same limitations apply as for previous reviews, namely:
 - It does not purport to be an LVA in its own right, and therefore does not attempt to identify and categorise all the potential effects;
 - It has not included a detailed technical audit of the photographic and visualization material, which has been taken as read;
 - It relies on the original fieldwork, which was confined to publicly-accessible locations and visits to selected viewpoints;

- It has not considered the status or weight to be given to relevant policy; and
- It does not address issues such as urban design, sustainability, biodiversity or cultural heritage, except where these may influence landscape/visual matters.

2. Implications of the Updated Parameter Plan

- 2.1 The December 2024 parameter plan is shown in **Figure 2.1** below. The submission version of the plan should be consulted to see it at full (A3) size and with the explanatory key.

Figure 2.1: Updated Parameter Plan



- 2.2 The main changes it shows are summarized in LVA Section 7 as follows: (It should be noted that these changes have been "taken as read" for the purposes of this review):

- Built development pulled away from the Houghton Road frontage, especially to the east of the access road, together with additional tree planting between Houghton Road and the development area;
- Limitation of housing density closest to the Houghton Road site access to not more than 23 dwellings per hectare. The overall housing density across the rest of the housing development area is 28 dwellings per hectare;

- Reduction in the scale and changed nature of the central open space within the housing development area, from an oval of 0.4 hectares to a linear park/spine of 0.16 hectares;
- Slight reduction in the scale of the Main Development Area (including the community orchard but excluding the central open space), from 4.53 hectares to 4.29 hectares;
- Increase in the scale of open space to the east of the site;
- Additional tree planting on the eastern boundary of the site;
- Extension of maximum 8.5m building height area to cover the northern part of the main developable area to the west of the access road;
- Consolidation of two proposed children's play areas into a single play area located to the south of the housing development area; and
- Western edge of the developable area boundary pulled eastwards slightly to show clear avoidance of root protection areas.

2.3 For comparative purposes, the previous (August 2024) version of the parameter plan, as used for the Second LVA Review, is shown in **Figure 2.2** below.

Figure 2.2: Previous Version of Parameter Plan



- 2.4 As can be seen, apart from the addition of information, and the changes described above, the fundamental parameters of the development remain. Specifically, the main development area occupies c61% of the Houghton Road frontage, with the remaining 39% occupied by the corridor of open space adjacent to the eastern boundary. Where the development area is at its widest, it occupies c69% of the width of the site, with the width of the green corridor reduced to c31%.
- 2.5 In addition, the character of that green corridor has also materially changed, with the introduction of a children's play area and additional paths. These changes harm the residually rural appearance of the corridor as meadowland, since it would take on a more suburban character. This would reflect its increased level of use as amenity space by the new residents, and a consequently more designed appearance and more intensive management regime (probably with a greater frequency of mowing).
- 2.6 The separating function of the site as green space will have been reduced to a material degree, both spatially and visually, even allowing for demolition of the former buildings. There will be little perceived break in the westward extension of St. Ives along the southern side of Houghton Road, to complement the existing development to the north.
- 2.7 The site lies within the Western Periphery Townscape Character Area (of St. Ives). The combination of the reduced extent and suburbanized character of the green corridor, together with the introduction of the "main developed area" to the west, will decrease the perception of the CA as part of the rural fringe, and thereby its contribution to maintaining separation between St. Ives and Houghton.

3. Concerns remaining from the Second LVA Review

- 3.1 The Second LVA Review assessed the 2024 LVA against a checklist of compliance with good practice, from which it identified a number of matters of potential concern. The matters that had not been explicitly addressed, or had been only partially addressed, in the LVA are summarized below.
- i. The site and its component landscape/perceptual attributes had not been identified as landscape receptors for assessment purposes
- 3.2 GLVIA3 advises that *"The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected..., often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects."* [GLVIA3, 5.34 bullet 1].
- 3.3 The 2023 LVA did not follow this approach, identifying only the district-wide landscape character areas (LCAs) as receptors. Whilst the 2024 LVA also assessed the townscape character areas (CAs) within St. Ives, it failed to consider individual landscape components and perceptual factors (e.g. pastoral land, openness).
- ii The site's representativeness of/contribution to the published LCAs had not been fully assessed
- 3.4 The 2023 LVA included no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs. It was therefore difficult to understand how the LVA had arrived at its assessment of effects on them.
- 3.5 The 2024 LVA updated the baseline LCAs in accordance with the Huntingdonshire Landscape and Townscape SPD, 2022, and included new descriptions of the relevant St. Ives character areas [Ref 2024 LVA 5.2.3.2].
- 3.6 The site is located within the Western Periphery (Townscape) Character Area, and the Great Ouse Valley LCA, which were assessed as being of Medium and High sensitivity respectively. There was still, however, no explicit reference to the degree to which the characteristics of the site contribute to/detract from this CA/LCA, and therefore to how the development's impact on them has been derived.
- iii. The conservation areas adjoining the site (and their component sub-areas) had not been identified as landscape receptors
- 3.7 Whilst conservation areas are primarily heritage designations, they often have landscape (or townscape) implications, particularly where they may include greenfield land and/or possess a wider setting (which is the case here). Their

conservation status suggests that they should be regarded as being of high landscape/townscape sensitivity.

3.8 The First LVA review noted that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The 2023 LVA did not assess whether there would be any effects on the character or setting of either CA.

3.9 The 2024 LVA also contained no such assessment (or cross-reference to a Heritage Statement or similar). However, effects on these CAs, and their settings, were reported in the Cultural Heritage Desk-Based Assessment (DBA, AECOM, December 2021). Whilst it is reasonable that a parallel assessment within the LVA has not been provided, an explicit reference to the DBA – and in particular to how it has influenced landscape value – would have been useful.

iv. There was no explicit consideration of whether the site may form part of a valued landscape¹

3.10 The First LVIA Review pointed out that the south-western part of the site falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton Conservation Area. Its setting to the south extends across the Ouse valley, which is a landscape of some scenic, biodiversity, recreational and heritage value.

3.11 The site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB, now National Landscape). The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.

3.12 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site may contribute to that value. This possibility was not acknowledged in the 2023 LVA, although the Great Ouse Valley LCA is considered to be of high sensitivity. Such an acknowledgement was also absent from the 2024 LVA.

v. In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful

¹ As per NPPF187(a)

- 3.13 No additional views in this location were added for the 2024 LVA. However, additional viewpoints requested by HDC (3a and 18) were considered, together with two longer-distance views from the south-east (21/22). This deficiency therefore remained.
- vi. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.
- 3.14 The request for longer-distance views from the south/south-east was addressed in the 2024 LVA by the addition of VPs 21/22. However, no additional short-range views were provided. This deficiency therefore remained.
- vii. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable
- 3.15 The First LVA Review commented that, of the six receptor groups comprising users of PROWs or public access land, three are of medium sensitivity and three are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that "*visual receptors most susceptible [PRA emphasis] to change are...likely to include...residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way...*".
- 3.16 There was no change to the approach to receptor sensitivity in the 2024 LVA Appendix A: Methodology. As a result, potential concerns over the reliability of the 2024 LVA in relation to visual impacts remained.

Summary of Response in 2024 LVA

- 3.17 Of the ten matters highlighted in the First Review, three received a full response in the 2024 LVA, four received no explicit response, and the remaining three received a partial response. Those for which a full response was provided relate to the agreement of viewpoint locations, the extension of the ZTV to 5km and the provision of summer/winter photography.
- 3.18 Two of the matters to which partial responses had been provided related to the inclusion of additional viewpoints. These comprised the two viewpoints requested by HDC, and two longer-distance viewpoints to the south/south-east that reflect the extended ZTV. No additional close-range viewpoints, as requested by the Parish Council, were provided.
- 3.19 Notably, there was no explicit response to the matters relating to the assessment of site character and its component attributes, its contribution to the published LCAs/CAs, the Conservation Areas or sensitive visual receptors.

Neither was any explanation provided as to the reason for this absence. It seems likely, however, that the consultation comments from HDC were prioritised, together with more obviously technical matters, whilst those from the Parish Council, or which sought to challenge the judgmental basis for the LVA, remained unanswered.

- 3.20 Finally, the 2024 LVA was based on a version of the development parameter plan that had been superseded two months earlier, and therefore did not assess the latest iteration of the scheme, although this has been rectified by the current LVA.

4. Review of the January 2025 LVA

4.1 **Table 4.1** below summarises the latest LVA's response to the concerns remaining from the 2024 LCA.

Table 4.1: 2025 LVA Response to Remaining Concerns

Concern	LVA Response
i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes	Not addressed – site attributes such as openness and residual rural character are not identified as landscape receptors, and are instead subsumed within the LVA focus on published LCAs/CAs.
ii. The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed	Not addressed – the site lies within the Western Periphery character area and adjacent to the Central Claylands and Great Ouse Valley LCAs. The LVA still makes no comment on the degree to which the site contributes to or detracts from these areas, specifically in relation to the physical and perceived separation between St. Ives and Houghton.
iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors	Not addressed – the Conservation Areas (and their settings) are still not identified as landscape receptors in LVA Table 6.2.1-1, although parts of them fall within the LCAs/CAs that are. Whilst this may be because Conservation Areas are considered to be heritage receptors, rather than landscape receptors, the close perceptual relationship between them should have been acknowledged.
iv. There was no explicit consideration of whether the site may form part of a valued landscape	Not addressed – even though the Great Ouse Valley LCA is categorised as being of high value in LVA Table 6.2.1-1, has been considered for AONB status, and its landscape value is reinforced by its heritage and recreational attributes.
v. In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful	Not addressed – no additional viewpoints, including those requested by the Parish Council, have been considered. It is therefore still difficult to appreciate the sequential change in openness and separation along Houghton Road.
vi. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of	Not addressed – no additional viewpoints, including those requested by the Parish Council, have been

the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.	considered. Additional viewpoints requested by HDC had already been addressed in the previous versions of the LVA.
vii. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable	Partially addressed – Table 6.2.1-1 sets out how the sensitivity of specific receptors has been derived. In some cases, this sensitivity is readily understood (e.g. people walking across Houghton and Hemingford Meadows). Elsewhere, however, it is not clear why the sensitivity of intrinsically sensitive receptors such as residents appears to have been downgraded. There is a risk that viewing opportunity may have been confused with susceptibility, resulting in double-counting.
LVA does not assess the latest version of the parameter plan	Fully addressed – the LVA assesses the December 2024 parameter plan, as described in LVA Section 7, updated Figure 6 and the updated Type 4 visualisations

- 4.2 The January LVA fully addresses only one of the remaining concerns from the October 2024 review, in that the assessment now reflects the latest (December 2024) parameter plan.
- 4.3 Of the remaining concerns, one – queries about the sensitivity of the visual receptors – is considered to have been partially addressed, but only in so far as it is possible to deduce how that sensitivity has been derived.
- 4.4 None of the other concerns raised on behalf of the Parish Council have been addressed explicitly – unlike the matters raised during consultation with HDC.

5. Summary and Conclusions

Implications for the Reliability of the 2025 LVA

- 5.1 The First LVA Review advised that *"...the conclusions of the [2023] LVA should not necessarily be taken at face value..."*, and that *"...the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects"*. It also considered that *"...the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the [2023] LVA to overlook smaller-scale variations in effects that could be meaningful at a local level."*
- 5.2 The 2024 LVA improved its technical reliability in relation to the ZTV, seasonal photography, additional viewpoints and (townscape) character areas. However, queries remained over the judgmental aspects of its methodology, particularly in relation to representative and perceptual landscape attributes, landscape value and receptor sensitivity. The reliability of the 2024 LVA in relation to the relevant parameter plan at that time was also questioned.
- 5.3 The 2025 LVA has resolved the concern about its relationship to the latest (December 2024) parameter plan. However, no explicit response has been made to most of the concerns remaining from the Second LVA Review. This should be noted by the Parish Council, and by district councillors when they come to determine the application.

Implications for Separation between Houghton + Wyton and St. Ives

- 5.4 The June 2023 report for the Parish Council titled *"Implications for Separation between Houghton and St. Ives"* concluded the following:
- *The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road.*
 - *The majority of the site retains a greenfield character that reinforces its role as part of the open countryside.*
 - *Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).*
 - *The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road.*

- *This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.*
- *The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires.*
- *This openness is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.*
- *Although development would occupy only c22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road.*
- *As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.*
- *The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west.*
- *The visualizations in the 2023 LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.*
- *The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins.*
- *This is clearly contrary to NP Policy 3, and is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.*
- *The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b)².*
- *The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.*

² Now NPPF187(b)

- 5.5 The Second (October 2024) LVA Review considered those conclusions to remain fundamentally valid. The 2024 LVA made no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives. However, it did assess the development's impact on the St. Ives urban character areas (CAs), specifically the Western Periphery CA, in which the site is located. This approach is carried over into the January 2025 LVA.
- 5.6 As its name suggests, this CA forms the western fringe of the town, comprising a combination of built-up areas (Garnier Drive and The Spires), mature tree belts and open grassland. The area's association with the Great Ouse Valley, the Thicket Path and the Houghton and Wyton conservation area is acknowledged in the LVA to be of "increased local value".
- 5.7 The Western Periphery CA is considered in the LVA to be of Medium value and Low susceptibility, giving rise to Medium sensitivity [Ref LVA Table 6.2.1-1]. The proposed development is considered in the LVA to amount to a Low magnitude of change, which in combination with Medium sensitivity gives rise to a Minor Adverse effect at Year 1.
- 5.8 In my opinion, the predicted Minor Adverse effect under-states both the susceptibility to change of the residual green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. This encroachment is described in the LVA [ref 9.1.2.1] as a "slight alteration to a limited part of the CA". Whilst this may be the case spatially, it is unlikely to be the experience perceptually.
- 5.9 The LVA also refers to the retention of a "green wedge of open space" between the development and The Spires [same para ref]. However, as pointed out in the conclusion to the original LVA review, the width of the east/west green gap between Houghton & Wyton and St. Ives (which falls within this CA) would be reduced by about two-thirds.
- 5.10 The peripheral and transitional character of the CA – and thereby its contribution to separation between the settlements – would be further eroded by the suburbanizing effect of the proposal. The residual green corridor to the east of the main development area would acquire a more visibly designed quality, including a play area and additional paths, with an increased level of recreational use.

From: DevelopmentControl
Sent: 24 April 2025 21:21
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 24/04/2025 9:20 PM from [REDACTED].

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	<p>Commenting upon what is now the 8th amendment to this application, we welcome the Locally Equipped Areas of Play (LEAP) being removed from the east of the developable footprint to protect the remaining countryside separation gap. However to simply show it on the Revised Parameter Plan as an 'informal play area' in the linear green space within the housing development rather than locally equipped area seems inadequate.</p> <p>Play is fundamental to children's physical health, wellbeing, social development, and cognitive growth, factors which were recognised in the recent amendment to the National Planning Policy Framework (NPPF), which now explicitly references 'formal play spaces' rather than simply 'informal' spaces and giving play spaces a higher priority in local planning decisions.</p> <p>Given the importance of such spaces and the fact that a second play area has featured in all the previous 7 versions of this application, it seems incongruous that a second LEAP, fully</p>

equipped formal space, should not feature within the developable area.

Space of course does exist within the developable footprint if only the number of homes were reduced to that number allowable within the Local Plan. On paper the allocated site can contain a further 88 homes to complete the 400 earmarked in the Local Plan policy SI 1 for this area.

At present, Homes England are applying to build 120 houses which is 36% more than the Local Plan allocation. Even assuming it was acceptable to apply the +/- 10% tolerance in an upward direction, it would increase the house building on this site up to 97 so still freeing up space for a play area as well as the option to remodel and remove houses from the sensitive road entrance to the site. We estimate that doing this could also free up enough land within the development to provide space for a Multi Use Games Area (MUGA) or tennis courts, to relieve much needed capacity for other sports and leisure activities currently located on the village playing field.

Houghton is classified as a small settlement. By attempting to incorporate an extra c32 houses, and when taken together with Houghton Grange phase 1, it would represent a 68% increase in the number of dwellings in Houghton itself. This would be a more significant expansion than was anticipated in the Local Plan with implications for the capacity of the community infrastructure, sports and leisure facilities the village can provide. Another reason not to over egg the numbers but to look to provide facilities for the whole village community within the developable area itself.

Of equal concern is the high density of this housing on the edge of a small settlement. At an average of 31.4 it would be twice the density of the Houghton Grange phase 1 development (16 dwellings per hectare (dph)) and sited right on the edge of the village as it abuts the countryside gap which our Neighbourhood and Local Plan policies are designed to protect.

At 16 dph, Houghton Grange phase 1 is broadly consistent with the most densely developed areas of Houghton and lends itself to a countryside location. However, this application for Phase 2, at an average of c31 and c36 dph at its greatest concentration, is wholly inappropriate for both the village and its location.

This scale of density is also inconsistent with the recent Local Plan call for sites strategic land assessment criteria which had a cut off at 25 dph even for the edge of a town, let alone a small settlement when calculating capacity. More importantly, any development needs to be tailored to the local circumstances, for example, taking into account the existing densities which help shape and define the settlement, as well as any sensitivities of the area such as the fact that this development will be built within the last gap maintaining separation from the much larger Market Town.

However, even the Spires, which is on the outskirts of the town rather than small village settlement, and despite feeling intensively built out, actually has a much lower density at 25 dph.

Finally, we feel that by applying to build excessive numbers of homes on this remaining parcel is inappropriate and will result in planning harm. We therefore believe the very recent decision to reject the nearby Class C2 Residential Accommodation with Care at the junction of Harrison Way and Meadow Lane in St Ives (4/02275/FUL) is relevant. The decision to reject cites the reason that 'it would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area which has landscape and biodiversity value. Therefore, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP3, LP10, LP11 and LP12 of the Huntingdonshire's Local Plan to 2036 and the NPPF 2024.'

Therefore, in conclusion - reducing the numbers to fall back in line with NPPF, Local Plan and H&W Neighbourhood Plan policy leads to a far more acceptable solution, creating more space for play and leisure facilities, enhancing the perception of separation, complimenting Phase 1 and providing a more fitting density of housing for this countryside / small settlement location.

All of which would then be consistent with the alternative proposal which this council shared with Homes England and the District Council in July last year and which respects the individual and distinct identities of the village and town (Policy HWNP 3).

Kind regards

From: [DevelopmentControl](#)
To: [DevelopmentControl](#)
Subject: Comments for Planning Application 23/00627/OUT
Date: 23 May 2025 13:37:49

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/05/2025 1:37 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	St Mary's Centre, Chapel Lane Houghton Huntingdon

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:

1. PLANNING MATTER

1.1. Outline planning (with all matters reserved except for means of site access) for the erection of up to 295 dwellings, provision of new roundabout access and secondary access, internal roads and footpaths, public open space and landscaping, surface water attenuation and associated infrastructure. Land East Of Houghton Hill Farm Houghton Road St Ives Ref. No: 25/00616/OUT

RESOLVED: Houghton & Wyton Parish Council recommend this planning application be REFUSED and submit the following response:

Housing situated at this location has been assessed and rejected in the past over many years for reasons of adverse impact on visual amenity, issues of sustainability, coalescence with surrounding settlements, loss of good quality agricultural land, and representing un-necessary building in the countryside. This latest application is contrary to current adopted planning policy and should be rejected for the following planning reasons:

It is not supported by the Huntingdonshire Local Plan or NPPF - particularly policies LP2; LP7; LP10 and NPPF 116.

LP10

a. seek to use land of a lower quality agricultural value in preference to land of higher quality value.

i. Avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 - 3a) where possible

The site is a Greenfield location situated in the countryside within Wyton on the Hill Parish. It would not contribute to reuse of previously developed land or regeneration. It would result in the loss of prime agricultural land.

For sustainability assessment purposes, Natural England defines Best and Most Versatile land as grades 1 - 3a. This is picked up and made legal policy in LP10. Hence just as the policy and guidance both state, we should only be considering land for development which is below grade 3a and not capable of achieving any

higher.

The Planning Statement accompanying this application puts forward the applicants' assertion that there is no lower quality land available and due to triggering the 'tilted balance' they should be exempt from this policy restriction. However, this fails to consider a sequential test argument (in the same way as that used for land that is subject to flooding risk) whereby if there is land of a lower quality available, it should be this which is developed first.

We know that such lower quality land is available because substantial amounts have already been put forward for development through the district's new Local Plan Call for sites and Land Availability Assessment which the council has conducted. Some of what has been offered and already assessed as suitable for development is also previously developed land.

Huntingdonshire benefits from the fact of having some of the very best quality and most precious agricultural land in the UK, which LP10 crucially looks to protect. The applicant admits that this only constitutes 78% of Huntingdonshire's total land mass which therefore still leaves 22%, or over one fifth of the entire District, below that level set by Natural England and LP10.

NPPF 116

Development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all future reasonable scenarios.[emphasis added]

We recognise that there are questions over the reliability of some of the data used for modelling the capacity assessments from this proposal, but even with these limitations, the applicant reports in their Planning Statement 6.57 that the queue increases at the A1123/Garner Drive Signalised Crossroads would be considered 'severe'. [emphasis added].

This does correspond with previous studies. As far back as 2011, Cambridgeshire County Council stated that based on background growth, the A1123 would be over capacity by 2017.

Pollution levels particularly from queuing vehicles at peak times most mornings and evenings on Houghton Hill have been the source of serious complaints to the Council and such a development would only exacerbate this.

At the Local Plan Hearing in 2018 for the current Local Plan - Matters 8, CCC stated that the highways modelling work had already highlighted significant impacts from housing situated west of St Ives. They had assessed 15 junctions and found that no less than 8 were anticipated to operate over capacity in the future year scenarios and that traffic generated from such a development would require strategic solutions to the road network for projected traffic flows to be acceptable.

1) The B1090/A1123 Houghton Road/Houghton Hill Road junction; 2) A1123 Houghton Road/Garner Drive signalled junction; 3) A1123 Houghton Road/Hill Rise/High Leys signalled junction; 4) A1123 Houghton Road/Ramsey Road/St Audrey Lane signalled junction; 5) A1123 St Audrey Lane/Somersham Road roundabout; 6) Stocksbridge Lane/Harrison Way roundabout; 7) B1514/The Avenue signal junction;

The latest Amended Traffic Assessment submitted as part of the Houghton Grange Phase II application 23/00627/OUT concludes that by 2028, even without Phase II going ahead the Houghton Road/Garner Drive/Houghton Grange Site Access junction is forecast to operate above capacity in 2028 in both the AM and PM peak hours. Likewise by 2033 the Houghton Road/Hill Rise/ High Leys Junction is also calculated to be over capacity.

We note that the current A141 & St Ives improvement scheme is not considered to deliver any strategic solutions to traffic congestion problems in St Ives.

Therefore we can only conclude that through NPPF116 development should be refused.

Furthermore, historic transport studies have all raised the point that St Ives has some of the highest levels of net outward commuting of any town in Cambridgeshire.

The strategic transport routes to and from St Ives run east (along the segregated guided bus route to Cambridge) and south east (towards the A14). Next busiest is the A1123 which takes traffic east/west through the town to link with these routes, hence a development of this scale situated to the west is on the wrong side of the town.

Likewise much has been made of the fact that the guided buses would run past the site entrance, however this is along the un-segregated road section and it is only upon reaching the other side of town, some three kilometres away, that the route emerges free of car traffic, hence once again west is not best.

In a bid to reduce net outward commuting, Employment Areas have been designated to encourage businesses to locate and employ more people locally. These are situated on the eastern side of St Ives and are set to expand further

east with Giffords Farm already being an allocated site for business and employment growth.

Therefore, another large-scale housing development on the western fringes, which puts the town in the way of people travelling to work, is not to be welcomed and will only contribute to the congestion already seen in the town.

LP7 Spatial Planning Areas

Residential Development

A proposal for housing development Will be supported where it is appropriately located within a built-up area of an identified Spatial Planning Area settlement. [emphasis added].

For reasons including those already mentioned, the proposed site is neither appropriately located nor within a built-up area of the Spatial Planning Area.

It abuts and overlooks the largest continuous conservation area in

Huntingdonshire and valued landscape of the Great Ouse Valley.

The development would sit on the boundary of Houghton & Wyton Parish and join the newly developed village extension of Houghton Grange phase 1. At 295 houses this would represent a built mass equivalent to a third of the existing number in the village.

It occupies high ground towards the north eastern edge of Houghton & Wyton and the concentration of housing and with ridge heights of circa 10m on such a flat, open and exposed site, it would contribute significantly to the perception of and actual coalescence between town and Village, and so goes against policy HWNP 3.

A landscape assessment conducted this year and submitted as part of the outline planning application 23/00627/OUT for the Houghton Grange field site (BBSRC field), concluded that this location operated to form an important countryside extension to the gap maintaining separation of the two very different settlements of St Ives and the village of Houghton & Wyton.

Redevelopment of the Houghton Grange site for residential use is already changing the character of this area. Development of this site would alter the form of the local area further by introducing development on both sides of the A1123 and increasing the perception of coalescence of St Ives with Houghton and Wyton.

Housing and massing extending west along the A1123 would essentially constitute ribbon development of St Ives. This would be exacerbated by the fact that a portion of the western boundary adjoins Houghton Hill Industries hence with development of the site effectively making this contiguous with St Ives. Development would affect the character of the local area by spreading the perception of the outskirts of St Ives along Sawtry Way and ultimately even the perception of linking with Wyton on the Hill.

Looking north, this large, concentrated mass of housing, begins to envelope the current softer edge of the town afforded by the recreation and sports grounds and creates an extended harder edge between Wyton on the Hill in open countryside and St Ives.

The site was offered for development again through the Local Plan Call for Sites last year. As part of the assessment for suitability to be taken forward, the question whether development can 'Make efficient use of land whilst also protecting the form and character of the local area?

The assessor answered this question stating that the 'majority of the land is surrounded by open space leisure uses or agricultural land; introducing built development would significantly impact on these by enclosing them into the built environment rather than the edge of settlement character they currently have'.

The proposal for 295 homes produces a density figure of 36 dph which would put the development into the 'Moderate' category of density as defined by the Supplementary Planning Guidance of the council. This is considered too high for an edge of town development, located a long way from the town centre. Were it to be developed, this settlement would form a buffer with very open countryside beyond and extending to Wyton on the Hill.

LP2 Distribution of Growth

Four Spatial Planning areas are designated reflecting their status as the district's traditional market towns and most sustainable centres.

This policy works in conjunction with LP7, the problems associated with which have been covered earlier.

Whilst development might relate well to modern housing on Garner Drive this only comprises a small element of the site's boundaries. The site relates poorly to Wyton on the Hill, Houghton & Wyton and St Ives in terms of position and sustainability. Experience shows that it would be difficult for this community to be embraced by the villages because the extremely busy A1123 already acts as a major impediment to those living north of it and it is isolated from the residential hub of Wyton on the Hill.

In relation to St Ives, the site is situated outside its built-up area and western boundary. It suffers from long distances to the town centre services. It is the opposite side of the town to the established employment areas as defined in the current Local Plan and the wrong side of town to access the principal transport routes and main direction of commuting.

The application is an unplanned, unsuitable extension of the town. It would constitute inappropriate building the countryside and result in the un-necessary loss of agricultural land (when other lower quality land is available), severely impact traffic flows in an area already suffering with roads/junctions over or nearing capacity; produce an overtly dense development contrary to guidance for a countryside edge of settlement, enclose open leisure areas within a built environment, and result in planning harm in terms of coalescence of settlements and loss of visual amenity.

1.2. Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works Land Between Houghton Grange And The How Houghton Road Houghton Ref. No: 23/00627/OUT

RESOLVED: Houghton & Wyton Parish Council recommend that this application be REFUSED and submit the following comments:

In response to the Revised Transport Assessment (April 2025) submitted by Homes England/AECOM, we would like to make the following comments: LTP3 and the Houghton & Wyton Neighbourhood Plan Policies HWNP 12 and HWNP 13 all point towards refusing this application as it stands, and towards reconsidering it following a reduction to the excessive number of homes currently proposed.

LTP3 sets out the overarching transport strategy for Cambridgeshire and amongst other things looks to improve reliability of journey times and managing demand for road space; maximise the capacity of the network; and reducing the length of the commute and the need to travel by car

The Revised Transport Assessment submitted with the application shows that by 2028, even without this development, the Houghton Road/Garner Drive/Houghton Grange Site Access junction is forecast to operate above capacity in both the AM and PM peak hours.

Likewise, by 2033 the Houghton Road/Hill Rise/ High Leys Junction is also calculated to be over capacity.

This application already pushes the boundaries of excess by trying to build extra housing, over and above the residual allocation for this single piece of land without justification. Homes England are unjustifiably taking the entire St.Ives West site allocation target and increasing it by 10%, then adding it to the residual housing allocation number for this remaining field. The excess amounts to an additional 32 dwellings and whilst Homes England may make the argument that a little extra will not have a significant impact on the overall situation, which will already be problematic, by definition it will make things worse.

LTP3 suggests the excess could and should be removed from the equation to help manage the road space, reducing movements and thereby improving flows in and around the junctions.

The Houghton and Wyton Neighbourhood Development Plan 2018-2036 contains two policies relating to parking and access to the village centre by non-car modes.

Policy HWNP12: Parking to serve new development/ Houghton and Wyton village states that 'any proposals to provide additional public car parking to serve the village of Houghton and Wyton will be supported in principle.'

As it stands the policy does not support the application, but as we have already argued in comments we submitted on 24th April 2024 to the third consultation, removing the excess housing numbers would create space for additional recreational facilities such as a MUGA to be allocated on the site and which could include public parking.

The village and surrounding area is very popular with visitors, so provision of extra public parking spaces in this location would certainly ease pressure in the main part of the village and beyond.

Policy HWNP13: Access by non-car modes states that 'any development within the parish which creates additional movements will have to demonstrate that there is good access to the village centre on foot or by bicycle and/or that there is good access to an operational bus route. Where such access is lacking and there is a deliverable solution, new provision must be made towards addressing this.'

The Revised Transport Assessment makes assumptions about the mode of travel that residents will use and models a high percentage of movements by

non-motorised modes. However, we feel that these are excessive and that car usage levels will be greater than assumed.

We already have anecdotal evidence from existing residents of Houghton Grange Phase 1, that there is a tendency to use the car when visiting the village to participate in the social and recreational life of the village rather than to walk or cycle.

This is concerning but probably explicable when considering the Pedestrian and Cycle Isochrones reported in the Revised Transport Assessment. They show that there isn't particularly good access to the centre of the village which is beyond 15-20 minutes away by foot and 5-10 minutes by bike.

This is even more problematic when considering there is a hill involved in the return journey, pointing to the fact that the site is less sustainable than has been suggested, and that car use will be greater than modelled.

It is another reason why the site should not be considered suitable for additional housing numbers beyond those originally allocated within the Local Plan.

Kind regards



Laura Fisher
Senior Development Management Officer
Huntingdonshire District Council
Pathfinder House
St Marys Street
Huntingdon
PE29 3TN

Dear Laura

S106 Monies forthcoming from Houghton Grange Phase II 23/00627/OUT

In respect of 23/00627/OUT Houghton Grange Phase II and the S106 monies that will be forthcoming as part of any approval of this application, we were very pleased to have met with Robbie Bratchell, Strategic Sports Development Officer, and discussed the formula by which S106 monies are likely to be calculated for additional sports & recreation facilities. However, in doing so we realise that the brief handed down to us from this is lacking in a number of respects for what is likely to be a material sum of money which needs to be well spent.

Firstly, the timing of any monies from this development need to be considered in the medium to long term. The S106 agreement signed for Phase 1 is nearly 10 years old and still a way off from triggering any payment. We have consulted the sports clubs locally and it is clear that as things stand, their own needs if they have them are mainly short term, related to replacement equipment rather than growth, and relatively small scale. They are also of a type that could be grant assisted in other ways than through S106.

The issue stems from the fact that the clubs are based on the one existing playing field we have in the village and constrained by its space and current use which is near to or at capacity. We are concerned that Phase I and Phase II are delivering very significant growth to our overall population (up to 25%) as well as changing the demographics of the village. Consulting residents on several occasions (most recently as part of starting a refresh of our Neighbourhood Plan), it is also clear that different local sports and recreation facilities are being demanded, but unfortunately cannot be accommodated by the Parish Council as land (and to some extent money) is simply not available.

We believe there may be some limited capacity for growth of existing and possibly new facilities if the use and layout of the playing field were professionally reviewed and facilities relayed, moved, or possibly replaced. To this end we discussed



obtaining some S106 monies to commission a professional study to investigate and recommend a more efficient use of our resources and ask that a sum for this is included within the S106 agreement.

We are also conscious that the very location of Houghton Grange, and especially that of Phase II, is now and will remain one of the most isolated parts of our village. It takes at least 20 minutes to walk to the existing playing field or centre of the village where most activities take place. Hence, we are very aware that to build a properly integrated community we need to locate some facilities within the developed footprint of the site itself.

Consequently, without prejudging the results of any survey, we have identified that our greatest need to accommodate the significant growth in the overall population of the village, and to meet the future changing demands of our society, is to secure community space/land within the Houghton Grange Phase II footprint. Space which can adapt to change and be used more flexibly such as through a Multi-Use Games Area (MUGA) or similar.

As we have commented through the various consultation exercises, we believe this is easily negotiable within the scope of the application from Homes England, which currently chooses to prioritise an excessive number and density of housing rather than the community infrastructure required for such an increase in village population.

We are therefore formally requesting an S106 agreement be secured which provides funds to improve the utilisation of existing parish land for sports and recreation provision, together with new land and infrastructure within the developed footprint of the Houghton Grange Phase II site to provide a new, flexible community sports and recreation facility.

We trust a more flexible brief can be agreed to provide more outdoor sporting/recreational opportunities for our growing community far beyond the present day.

Yours,


Clerk, Houghton & Wyton Parish Council



[REDACTED]

PLANNING APPLICATIONS

Official Responses from Planning Committee Meeting 24 May 2023

Application No Applicant/Agent	Proposed Development	Comments
[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] already refused the application.
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
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[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

<p>[REDACTED] [REDACTED] [REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED] [REDACTED]</p>
<p>23/00627/OUT</p> <p>Homes England Mr Jonathan Hill AECOM Aldgate Tower 8th Floor 2 Leman Street London E1 8F</p>	<p>Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works.</p> <p>Land Between Houghton Grange And The How Houghton Road, Houghton St Ives</p>	<p>Extension Request – the committee feels that more research is required into the proposed development due to the history and nature of the plot, as well as the potential effects of the proposed works on the area.</p> <p>The committee wishes to address the planning application at a future meeting.</p>
<p>[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>	<p>[REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>	<p>[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>
<p>[REDACTED] [REDACTED] [REDACTED]</p>	<p>[REDACTED] [REDACTED] [REDACTED]</p>	<p>[REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>

PLANNING APPLICATIONS

Official Recommendations from Planning Committee Meeting 28 June 2023

Application No Applicant/Agent	Proposed Development	Comments
23/00627/OUT Homes England Mr Jonathan Hill AECOM Aldgate Tower AECOM 8th Floor 2 Leman Street London E1 8F	Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works. Land Between Houghton Grange And The How Houghton Road, Houghton St Ives	Refusal – the proposed layout and density of the buildings will eliminate the green entrance to St Ives; as well as impede natural animal migration. The development area size is bigger than that shown in the current Local Plan vision of the area. In particular the north end of the development is too close to the A1123 thus impacting the green space and vista from the road. There should be a gap as big as that between the Spires estate and the road. The number of houses (120) is the maximum permitted for the area. St Ives town council would prefer the number to be much less and at or close to the minimum number within the permitted range (56 houses). The design of houses should be similar to that in phase 1 of the development and not a smaller more cramped town style development. The Town council note and agree with the concerns from Anglian Water re the drainage from the site and with those from the County Council re the traffic implications. The former should have been dealt with before the application was made. There appears to be no provision for Active Travel connectivity with Houghton village and through to Huntingdon.

		Feedback from the SITC and local residents was very much in opposition to the proposed development in its current format and general consensus was that many changes were required for it to be acceptable.
<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	<div>[REDACTED]</div> <div>[REDACTED]</div>
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	[REDACTED] [REDACTED] [REDACTED]	
[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]

From: [DevelopmentControl](#)
To: [DevelopmentControl](#)
Subject: Comments for Planning Application 23/00627/OUT
Date: 14 October 2024 13:25:04

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 14/10/2024 1:24 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	St. Ives Town Hall Market Hill ST. IVES

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	<p>Members were unhappy about the brevity of the consultation period for town and parish council feedback.</p> <p>While noting the minor changes to the configuration of properties within the proposed plan, members felt that previous concerns about the number and density of properties being proposed had not been addressed.</p> <p>The number of properties still exceeds HDC's requirements for the area. The density of 28 properties per hectare far exceeds those for Houghton Grange phase 1 (16 properties per hectare) and it also exceeds that for the Spires development in St Ives (26 properties per hectare). There is no perceived justification for the high density of this application.</p> <p>There was also concern of the impact the development would have on local amenities, including schools.</p> <p>In light of the recent flooding, members reiterated concerns that the developer had not specified the surface water drainage solution to be used at the site. Also that the more homes that are built on the site, the greater the flood risk from surface water could be.</p>

Kind regards

From: DevelopmentControl
Sent: 13 March 2025 13:05
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 13/03/2025 1:04 PM from [REDACTED].

Application Summary

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

[Click for further information](#)

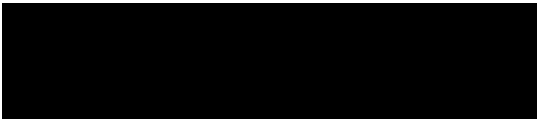
Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	St. Ives Town Hall Market Hill ST. IVES

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer made comments neither objecting to or supporting the Planning Application
Reasons for comment:	
Comments:	St Ives Town Council welcomes the increased green space in the north side of the development, however it was noted that this is compensated by the play area being moved to the east side. Councillors are looking for the impact to be minimal in terms of the open space between the development and St Ives.

Kind regards



Subject: Planning Application 23/00627/OUT - St Ives Town Council comments
Date: 15 May 2025 11:59:14
Attachments: [image001.png](#)
Importance: High

Good morning,

I have just submitted our Planning Committee's comments on the HDC portal regarding Planning Application 23/00627/OUT (Land Between Houghton Grange and The How), but after hitting the submit button it came up with a Server Error message.

I wanted to ensure you have the Town Council's view on the application. I have included their comments below.

Please can you confirm receipt?

St Ives Town Council recommends objection to the application, which was unanimous. Members noted that the Local Plan allocated 88 homes, plus or minus ten percent. The application's plan exceeds this number, and the Committee strongly feels that a figure of minus ten percent would be more appropriate for the area (79 homes). Councillors shared local residents' views on the application, noting that many objections have been made by the public.

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

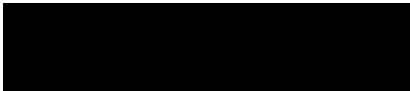
Additionally, the proposed density of 25dph for the development is not suitable for the edge of a town which cannot sustain a central town density. The application would also eliminate a significant amount of the green space between St Ives and Houghton.



Democratic Officer

St Ives Town Council

Town Hall, Market Hill, St Ives, Cambridgeshire PE27 5AL



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From: DevelopmentControl
Sent: 16 May 2023 12:16
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 16/05/2023 12:15 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	30 West Drive, Highfields Caldecote, Caldecote, Cambridgeshire CB23 7NY

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer made comments in support of the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council approve - It has met the Parish Council's concerns initially raised on impact from development on Hemingford Grey.

Kind regards

From: [DevelopmentControl](#)
To: [DevelopmentControl](#)
Subject: Comments for Planning Application 23/00627/OUT
Date: 15 October 2024 13:23:57

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 15/10/2024 1:23 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED]

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	<p>Hemingford Grey Parish Council object to the application:</p> <p>The Parish Council has confirmed that the amount of trees had decreased in the application.</p> <p>Drainage, sewerage and traffic are all severe issues in Hemingford Grey. The Parish Council has concerns about how it will be not possible to manage the drainage and sewerage requirements and the implications to the surrounding area which is designed as a Flood Plain in the Local Plan.</p> <p>This is also exacerbated by the reduction in tree numbers and increased building density.</p> <p>The Council has further concerns about the increased traffic on the A1123, which is already overcapacity.</p> <p>Hemingford Grey Parish Council believes that separation of Towns and Villages is important and this application would further degrade the buffer between Houghton and St Ives Town.</p> <p>The density of development is far higher than the surrounding area and would need significantly decreasing to be acceptable.</p>
-----------	--

Kind regards

From: [DevelopmentControl](#)
To: [DevelopmentControl](#)
Subject: Comments for Planning Application 23/00627/OUT
Date: 28 February 2025 13:41:48

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 28/02/2025 1:41 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED]

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council objects due to overdevelopment of the site, the development overrules the local plan for Houghton and Wyton, places too much strain on all the local services, the roads and destroys the historic nature of this village to becoming a suburb of St Ives. It would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.

Kind regards

From: DevelopmentControl
Sent: 22 April 2025 15:30
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/04/2025 3:29 PM from [REDACTED]

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	30 West Drive Highfields Caldecote Cambridgeshire

Comments Details

Commenter Type:	Town or Parish Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Hemingford Grey Parish Council noted that the amendments did not seem to be significantly different from previous applications, to respond that having reviewed the amendments, the Parish Council still objects to the application, and to reiterate its previous comments: Hemingford Grey Parish Council objects due to overdevelopment of the site, the development overrules the local plan for Houghton and Wyton, places too much strain on all the local services, the roads and destroys the historic nature of this village to becoming a suburb of St Ives. It would like to see the 'green gap' between this ancient tourist village and market town of St Ives preserved in perpetuity.

Kind regards

For the attention of Laura Fisher

Dear Laura

Please find below Hemingford Abbots Parish Council's response to the following planning application:

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

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

RESOLVED to recommend refusal of this outline planning application as the development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal. This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish.

Kindly update the planning portal with our recommendations.

Thank you



Parish Clerk/RFO

Hemingford Abbots Parish Council

Emailed to HDC 30/5/23



HDC Planning Department,
Huntingdon District Council,
Pathfinder House,
St Mary's Street,
Huntingdon,

22nd October 2024.

Dear Sir / Madam,

Ref: 23/00627/OUT

Hemingford Abbots Parish Council is writing to express our strong objection to the latest Houghton Grange Phase II Development Proposal (planning application for up to 120 homes Use Class C3).

Although this application is not located in Hemingford Abbots, it is only one mile from our parish boundary - and we are sufficiently concerned about the testing of several important planning principles that we resolved to share our thoughts in writing ahead of any decision being made.

Our anxieties can be summarised as follows:

- 1) There are reportedly over 130 documents listed on your website related to this planning application: whilst we understand that the necessary 21 days' period was offered to statutory consultees, we were alarmed to hear that only 14 days has been granted to other interested parties. In our opinion, this is insufficient time to allow a layperson to properly consider such what is an unusually large quantity of technical and complex documents. The unnecessarily short consultation period therefore sets an unwelcome precedent, and does not promote support for local democracy.
- 2) We understand that the latest version of the application (120 homes) is in contradiction to the local and relevant Neighbourhood Plans. We would like to ask: what the point is of seeking agreement with a local population regarding acceptable and sustainable development if this is to be over-ridden and ignored? We believe that the high density of this phase (28 houses per hectare) ignores the anti-coalescence policy, and introduces unnecessary risks to local amenity and tourism. At the very least, the housing density should be feathered at the edges of the development.

- 3) Hemingford Abbots Parish Council previously submitted our concerns regarding this development in July 2023 as follows:

“Hemingford Abbots Parish Council recommends refusal as the development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on HDC portal as a reason for refusal.

This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish.”

These opinions remain relevant today and in particular, the potential overflow of surface water into the river has yet to be addressed by any of the parties involved.

We also request that a full and proper assessment is made with respect to the capacity of the drainage and irrigation systems for the wider site, because much of the infrastructure in the surrounding area is potentially obsolescent and prone to failure.

Yours faithfully,



Parish Clerk
for and on behalf of Hemingford Abbots Parish Council

Laura Fisher

From: [REDACTED]
Sent: 29 April 2025 17:07
To: DMAAdmin; Control, Development (Planning)
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Importance: High

Dear Team

Please see below HAPC's comments in relation to the planning consultation on the Land Between Houghton Grange and The How, Houghton Road, Houghton:

Resolved to recommend refusal of this planning application for the same reasons HAPC gave at the original application stage, these are:

The development is not in accordance with HDCs Local Plan. The Plan acknowledged development on the site but not on the scale and size in the application with a resultant loss of openness between Houghton and Wyton and St Ives, exacerbated by building close to, rather than away from, the A1123. HAPC is also concerned about the potential overflow of polluted surface water from the site into the river, which is stated by CCC on the HDC portal as a reason for refusal. This is especially relevant to Hemingford Abbots as any damage to the health of the river would directly affect the parish.

I would be grateful if you would add our comments to the planning portal and let me know when this has been done – thank you.

Kindest regards

[REDACTED] Parish Clerk
Hemingford Abbots Parish Council | 18 Church Street | Hemingford Grey | PE28 9DF

[REDACTED]
[REDACTED]
Website: www.hemingfordabbots.org.uk

Please note my days of work vary and I may not be able to respond to your email immediately.

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From: Dmadmin@huntingdonshire.gov.uk <Dmadmin@huntingdonshire.gov.uk>
Sent: 04 April 2025 11:24
To: [REDACTED]
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Dear Parish Clerk,

Please find correspondence from Development Management at Huntingdonshire District Council

attached to this email in relation to the following application for planning permission.

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

Site Address: Land Between Houghton Grange And The How Houghton Road Houghton

Reference: 23/00627/OUT

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If you have any doubts or concerns relating to this email please contact us directly, our contact details are provided below.

Development Management
Huntingdonshire District Council

T: 01480 388388

E: dmadmin@huntingdonshire.gov.uk

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From: DevelopmentControl
Sent: 25 June 2023 11:01
To: DevelopmentControl
Subject: Comments for Planning Application 23/00627/OUT

Categories: [REDACTED]

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/06/2023 11:00 AM from [REDACTED].

Application Summary

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

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	2 Anderson Drive, St Ives PE27 6AF

Comments Details

Commenter Type:	Officer of the Council
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	<p>My comments are on behalf of Wyton on the Hill Parish Council as discussed at their parish meeting on 8th June 2023.</p> <p>We do not object to building on this land but it needs to be proportionate and given proper attention which we feel this application does not.</p> <p>We believe that this application has not followed the local plan in any way.</p>

Transportation will be an issue with an increase of the flow of traffic past our estate, into St Ives and passing Houghton and Wyton villages.

There will be increased flooding risks and drainage problems which will in turn have knock on effects in our parish.

The integration of settlements is not what we would like to see.

It will weaken future attempts at anti coalescence.

The valued landscape would be devalued.

Kind regards

From: [REDACTED]
To: [DMAdmin](#)
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)
Date: 14 October 2024 08:43:36

Thank you for your email. This was discussed at our Parish Council meeting last Thursday (10th October) and the councillors have the following comments:

Your email has been the first time we have heard of this – we are very close neighbours and the impact on our parish will be huge.

- The amount of time given (2 weeks) is unacceptable for a council to make a decision on this item. All our councillors work full time and find it unreasonable to be able to read 131 documents in that timescale. We request that we have more time to comment and will discuss again at our next meeting on Tuesday 12th November 2024.
- How large will the gap be between Houghton and St Ives – will there even be a substantial gap at all?
- The impact on flooding will be horrendous. Wyton on the Hill itself flooded in December 2020. More housing in such a close proximity to Houghton and Wyton would impact the amount of emergency services that could potentially attend to Wyton on the Hill.
- The increase in traffic on an already over used road.

The above are just a few comments from councillors as explained. We request the District Council gives more time for us to properly read the information given and make our comments.

Kind regards,

[REDACTED]

[REDACTED]
Parish Clerk and Responsible Finance Officer
Wyton on the Hill Parish Council

[REDACTED]

[REDACTED]
[REDACTED]

Please note I only work 7.5 hours a week so you may not get an immediate response to any email sent.

From: Dmadmin@huntingdonshire.gov.uk <Dmadmin@huntingdonshire.gov.uk>
Sent: 01 October 2024 16:38
To: [REDACTED]
Subject: RE: Planning Permission Consultation - Land Between Houghton Grange And The How Houghton Road Houghton (ref 23/00627/OUT)

Dear Parish Clerk,

Please find correspondence from Development Management at Huntingdonshire District Council attached to this email in relation to the following application for planning permission.

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

Site Address: Land Between Houghton Grange And The How Houghton Road Houghton

Reference: 23/00627/OUT

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If you have any doubts or concerns relating to this email please contact us directly, our contact details are provided below.

Development Management
Huntingdonshire District Council

T: 01480 388388

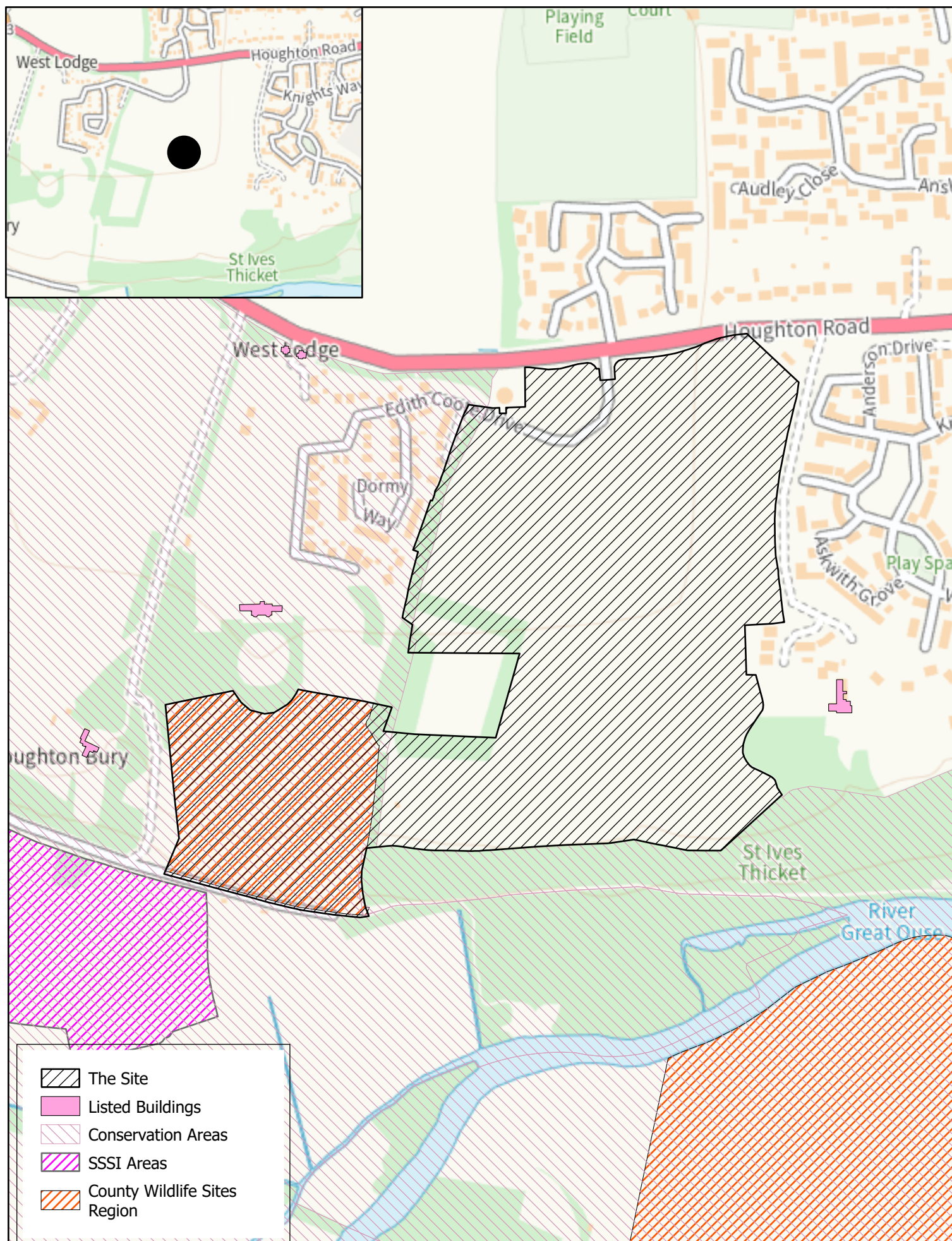
E: dadmin@huntingdonshire.gov.uk

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Date Created: 04/07/2025



Development Management Committee

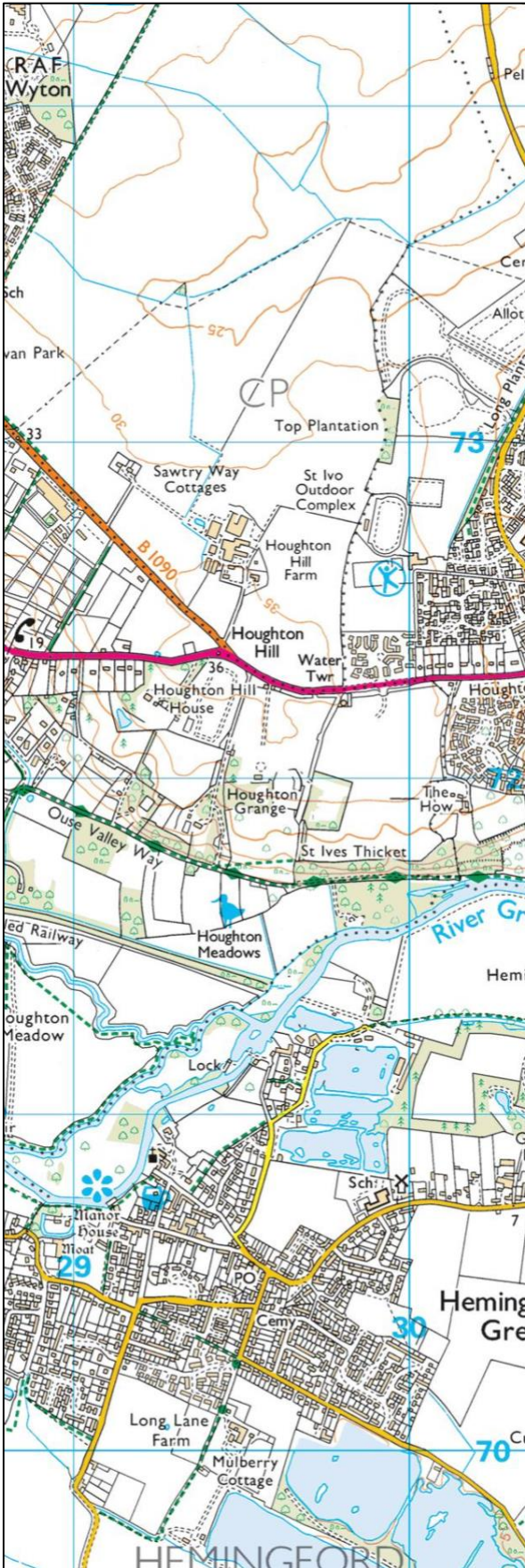
Application Ref: 23/00627/OUT



Scale = 1:5,000

Date Created: 04/07/2025





MICHELLE BOLGER
Expert Landscape Consultancy

**Land off Houghton Road,
Houghton**

Review of
**2025 Revision of
Planning Application**

Prepared for
**Huntingdonshire
District Council**

Application Ref
23/00627/OUT

June 2025



MICHELLE BOLGER
Expert Landscape Consultancy

Company Registration No. 09809868
Registered Office: 35 Pickford Road Bexleyheath DA7 4AG

Prepared by:



Position:

Director

Qualifications:

FLI, Dip. LA, BA (Hons) LA, PGCE, BA (Hons) Eng

File name:

1273 Houghton Grange 2025 Revision Final .docx

Date issued:

June 2025

Status:

Executive Summary

1. This review by Michelle Bolger Expert Landscape Consultancy (MBELC) concerns the landscape and visual aspects of application 23/00627/OUT for up to 120 homes on land west of St Ives.
2. The site is located within the SI 1 Allocation from HDC's Local Plan (2019). Concerns have been raised by Houghton and Wyton Parish Council (PC) that the development proposed would result in coalescence between Houghton and Wyton and St Ives. I consider that the site already reads as being part of St Ives and this is reflected in the recent Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 (HDC SPD). The HDC SPD includes all of the SI 1 Allocation within the Western Periphery Character Area of St Ives.
3. The gap between St Ives and Houghton and Wyton is already experienced as the land between the Houghton Grange Phase 1 development, the most westerly part of the SI 1 Allocation, and the eastern edge of Houghton. This will not change when the proposed development is in place.
4. The LVA submitted with the application is adequate and has assisted in the assessment of the landscape and visual effects of the development. The methodical approach adopted in the LVA is acceptable although it does not always reflect best practice. Although there has been some underestimation of effects I agree with the overall conclusions of the LVA. I consider that the landscape and visual effects of the proposed development are unlikely to represent a reason to refuse the application.
5. Two previous reviews prepared by MBELC in April and November 2024 are attached to this review.

Introduction

7. In April 2024 Michelle Bolger Expert Landscape Consultancy (MBELC) prepared a review of an application 23/00627/OUT for up to 120 homes on land west of St Ives for Huntingdonshire District Council (HDC) (MBELC April 2024 Review). In September 2024 the Applicant submitted an amended application. MBELC reviewed the changes and prepared an updated review (MBELC Nov 2024 Review).
8. Since November 2024 a Revised Landscape and Visual Appraisal (LVA) dated January 2025 has been submitted as well as a Revised Illustrative Master Plan (Rev 4 dated 02/03/2025) and a revised Parameters Plan (Rev 09 dated 07/05/2025). Unless otherwise stated all references in this review are to the most recent LVA, Illustrative Masterplan or Parameters Plan. I do not repeat everything from the two earlier MBELC Reviews but make reference to where they set out in greater detail issues which are summarised in this Review.
9. HDC have instructed MBELC to review these latest documents. In addition HDC has asked MBELC to consider a *Review of the Landscape and Visual Appraisal* which Houghton and Wyton PC commissioned from Peter Radmall M.A., B.Phil, CMLI. The Review dated February 2025 (Peter Radmall 2025 Review) forms part of the objection to the application from Houghton and Wyton PC. A further visit was made to site on 24/06/25.
10. Peter Radmall had previously prepared a Review of the application in 2023 and at the same time a separate study entitled *Implications for Separation between Houghton and St Ives* (Peter Radmall Separation Study). Both these reports were considered when the MBELC April 2024 Review was prepared. Peter Radmall prepared a Second LVA Review in 2024. However, as the Peter Radmall 2025 Review summarises the contents of the previous reviews and identifies outstanding issues only the 2025 Review is referenced.
11. I have identified two main landscape issues raised by Peter Radmall on behalf of Houghton and Wyton PC which are:
 - The effect of the development on the separation between Houghton and Wyton and St Ives
 - Whether the methodology used in the LVA has resulted in inaccurate conclusions on landscape and visual harm.

Separation between Houghton and Wyton and St Ives

12. This is a key issue raised in the Houghton and Wyton Parish Council's (PC) objections and in the Peter Radmall Separation Study. It is addressed in detail in Section 2 of the MBELC April 2024 Review and summarised here.
13. The PC's concerns relate to Policy HWNP3 - Anti -coalescence in the Houghton and Wyton Neighbourhood Plan 2018 (NP) The Policy states that *'Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives.'* Text accompanying the Policy identifies the site as lying within *'land ... separating Houghton and Wyton from St Ives'*.
14. HDC's Local Plan (Adopted May 2019) allocates the site as part of SI 1 St Ives West (Allocated Site SI 1). The policy states that *'Once developed, parts of this site that comply with the 'Built-up Areas definition' will form part of the built-up areas of St Ives or Houghton and Wyton as appropriate and considered as part of such for the purposes of determining planning applications.'* It is stated that successful development of the site will require *'maintaining a sense of separation between developments at Houghton Grange and The Spires'* but there is no reference to this area forming the separation between St Ives and Houghton and Wyton. The diagram on page 197 identifies this area as 'open space'. The arrow 'to Houghton' is located to the west of the whole allocation.
15. In 2022 the Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022, (HDC SPD) was prepared. It identified the site and the whole of Allocated Site SI 1 as being located within the Western Periphery Character Area. The HDC SPD acknowledges that Allocated Site SI 1 lies within Houghton and Wyton parish but identifies Allocated Site SI 1 as now forming *'part of the St Ives Spatial Planning Area.'*¹. There is no reference, either in the description or the recommendations for Development proposals, to Allocated Site SI 1 or the application site as forming part of the separation between St Ives and Houghton and Wyton.
16. The MBELC April 2024 Review identified this tension between the Houghton and Wyton NP and the HDC SPD. Principally that the Houghton and Wyton NP identifies the site and the Houghton Grange Phase 1 development as within Houghton and Wyton whereas the HDC SPD identifies them as part of the urban area of St Ives.

¹ Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Page 300 paragraph 7.63

17. The MBELC April 2024 Review included an assessment of whether the site did indeed provide separation between Houghton and Wyton, as identified in the Houghton and Wyton NP Policy HWNP3, or was really part of St Ives as identified in the HDC SPD. The conclusion I reached was that in terms of the current character Allocated Site SI 1 is part of St Ives. The factors on the ground that lead me to this conclusion are:
- The Slepe Meadow estate² extends the edge of St Ives westwards north of Houghton Road. It is located opposite the Application site and ends immediately before the Houghton Grange Phase 1 development begins, to the south of Houghton Road. The Slepe Meadow estate is clearly urban in character and part of St Ives.
 - The access road for Houghton Grange Phase 1 is located opposite the access to the Slepe Meadow estate.
 - Road widening and traffic signals at the access road for Houghton Grange Phase 1 contribute to the urban character.
 - The Houghton Grange Phase 1 development is urban in character and relates to the Slepe Meadow estate.
18. When it was a research facility Houghton Grange was located in the countryside between St Ives and the village of Houghton and Wyton. However since 2018 there has been a significant change in character in this part of the landscape. Within Houghton Grange Phase 1 the change has been from a rural commercial/scientific facility to a residential development but beyond the Houghton Grange Phase 1 there have also been significant changes in the landscape between Houghton Grange and the edge of St Ives. These include the extension of St Ives westwards, the Slepe Meadow estate development, the Houghton Grange Phase 1 access road, road widening along Houghton Road and the introduction of traffic signals. There have been no significant changes in the landscape between Houghton Grange and the edge of St Ives. As a consequence Houghton Grange Phase 1 now relates more clearly to St Ives. It is not perceived as part of the village of Houghton and Wyton nor an extension to the village as stated in the 28/02/25 objection letter from Houghton and Wyton PC. It is also not perceived as *'its own built up area'* as hoped for by the Houghton and Wyton NP³.

² In the earlier MBELC reviews this was referred to as the Garner Drive development but I have since seen that it is mostly referred to as the Slepe Meadow estate so I have used that term in this review.

³ Houghton and Wyton Neighbourhood Plan paragraph 5.19

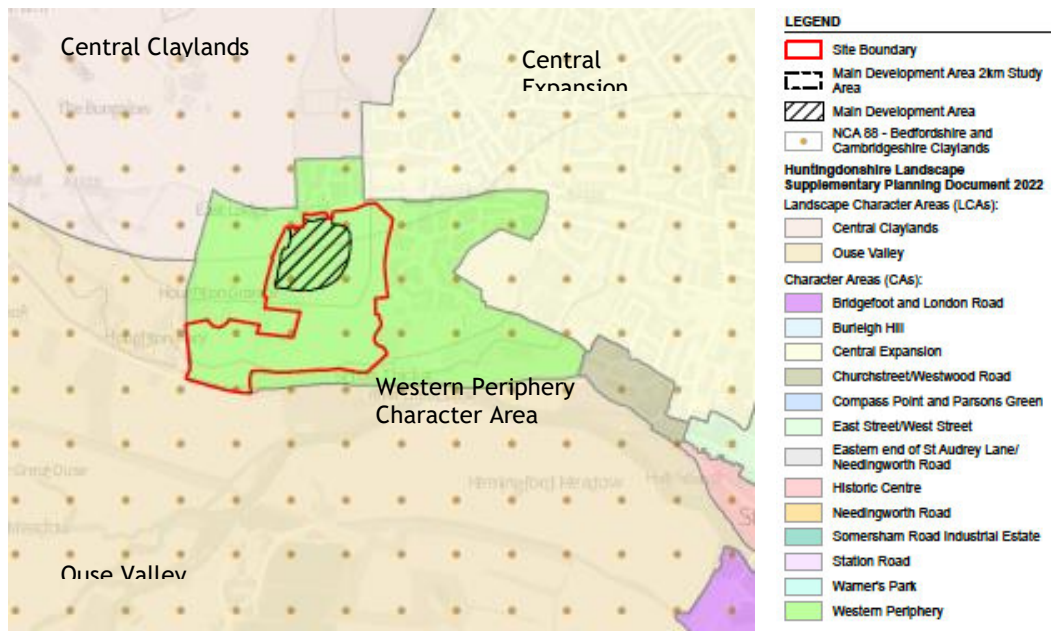
-
19. My conclusions on this matter are very different to those reached in the Peter Radmall Separation Study 2023. It is primarily because of this difference of opinion on the central issue that we disagree on whether the LVA has adequately assessed the landscape and visual effects of the application.
20. The Allocation Site SI 1 includes both the western edge of the St Ives and the Houghton Grange facility. The policy requirement is to maintain '*a sense of separation between developments at Houghton Grange and The Spires*⁴.' The Eastern Open Space proposed for the development will maintain a sense of separation between the Houghton Grange developments and The Spires, but this will not function as separation between St Ives and Houghton and Wyton as desired by Policy HWNP3 of the Houghton and Wyton NP. However, this is not as a result of the current development but because Houghton Grange Phase 1 already reads as part of St Ives for the reasons set out above. For the same reasons I consider that the proposed development will not harm the '*individual and distinct identities of the village of Houghton and Wyton and the town of St Ives*' as they are currently experienced.

⁴ HDC Local Plan Page 195

Methodological Issues

21. The Peter Radmall reviews of the LVA raise a number of objections to the LVA methodology and the outstanding Issues are listed in the Peter Radmall 2025 Review Table 4~1: 2025 LVA Response to Remaining Concerns. I have addressed them in turn below.
 - i. **The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes - the 2025 LVA continues to subsume these attributes within the LVA focus on published LCAs and CAs.**
22. It is important, as required by *Guidelines for Landscape and Visual Impact Assessment, 2013* (GLVIA), that all the components within a site and the landscape beyond it potentially affected by the development are considered in a LVIA, and a judgment reached on the effects of the development. However, GLVIA is not proscriptive that this should be done by identifying them all as landscape receptors with a judgement regarding the effect on each receptor. The latest LI Guidance Technical Guidance Note (TGN-2024-01) *Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment* clarifies this. At 5 (2) it states that *'Landscape features, elements and characteristics that could be subject to change must be clearly described in their own right and could be treated as receptors if appropriate.'*
23. Some LVAs do identify the site and component parts as separate landscape receptors and assess each separately. However it is common for LVAs to limit the landscape receptors to LCAs that may be affected by the development. The identification of multiple landscape receptors can sometimes be unhelpful to the decision-maker who has to reach an overall conclusion on landscape harm. Personally I prefer to use a single landscape receptor *'the site and the immediate landscape'* with the *'immediate landscape'* being the area that influences the site and which has the potential to be affected by the development.
24. The Character Area in which the site is located in the HDC SPD, the Western Periphery, is small and includes all landscape that would be considered as *'the site and its immediately landscape'* as can be seen from LVA Figure 3. In fact the site's immediate landscape extends beyond the Western Periphery Character Area. For ease of refence I have included an extract from LVA Figure 3 below and annotated it

Plate 1 - Annotated extract from LVA Fig 3



25. The Western Periphery Character Area includes part of the Houghton and Wyton CA and a small part of the St Ives CA although only the former is mentioned in the description of the Western Periphery.⁵ Most of the area of the Houghton and Wyton CA within the Western Periphery is occupied by the Houghton Grange Phase 1 development.
- ii. The site's representativeness of/contribution to the published LCAs/CAs has not been fully assessed- the 2025 LVA makes no comment as the degree to which the site contributes or detracts from these areas, specifically in relation to the physical and perceived separation between St Ives and Houghton.
26. With regard to the identification of the contribution that the site makes to the published LCAs Table 6.2.1-1 Sensitivity of receptors does identify how the key characteristics of the LCAs/Character Areas influences their susceptibility. I agree with the conclusion of the LVA that the Great Ouse Valley LCA has high sensitivity to the proposed development and the Western Periphery Character Area has medium sensitivity.
27. As set out above I do not consider that the site contributes to the perceived separation between St Ives and Houghton and Wyton.

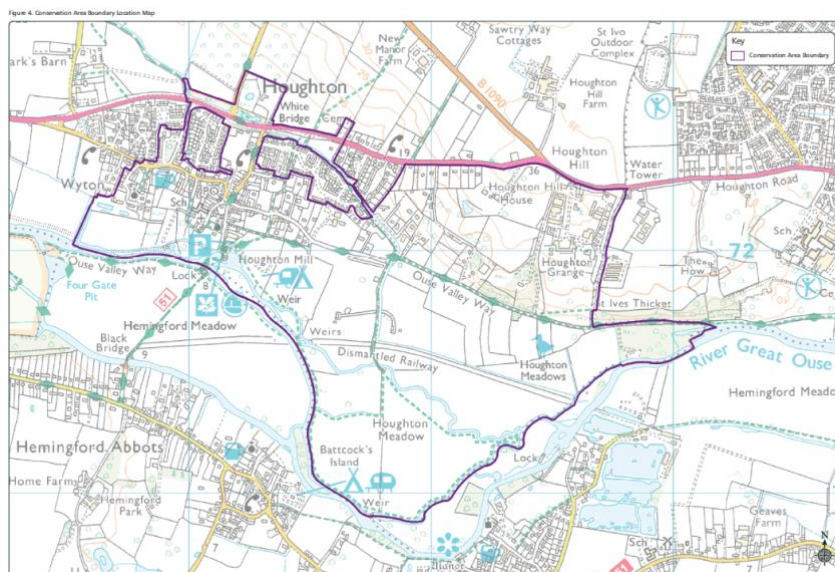
⁵ Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Pages 300-301

iii. Conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors - The conservation areas continued to not be identified as landscape receptors in the 2025 LVA.

28. With regard to the St Ives and Houghton and Wyton Conservation Areas (CA), they are considered within the LVA baseline assessment (e.g. 5.2.4.4 and 5.2.4.5). It would have been good practice to have mention them in the assessment of landscape value, e.g. the assessment of value for the Great Ouse Valley LCA in which they are both located. However, as the LVA assessment of landscape value for the Great Ouse Valley LCA is high it has not resulted in any underestimation of value.
29. In preparing this final review I have noticed that the extent of the Houghton and Wyton CA is shown incorrectly on LVA Figure 1. I have throughout my assessments been using the Houghton and Wyton CA Appraisal and I attach the plan from that document for reference.

Plate 2 - Figure 4 Conservation Boundary Location Map

from Houghton and Wyton Conservation Area Character Assessment October 2012



30. The Revised Cultural Heritage Desk Based Assessment December 2024 does identify the extent of the Houghton and Wyton CA accurately (paragraph 5.1), makes reference to the Character Areas identified in the 2012 Houghton and Wyton Conservation Area Character Assessment (paragraph 5.3) and undertakes an assessment of impacts on the CA and its setting (paragraphs 6.5 and 6.6).
31. HDC's Conservation Officer has assessed the impacts on the two CAs and concluded that any harm caused to the conservation areas and their settings will be less than substantial at the lower end of that scale.

iv. **There was no explicit consideration of whether the site may form part of a valued landscape - The 2025 LVA does not include this consideration despite the Great Ouse Valley LCA being categorised as high value.**

32. There is no explicit consideration of whether the site may form part of a valued landscape in the LVA. I agree with Peter Radmall that a Valued Landscape Assessment in accordance with current LI guidance (LI's TGN 02/21 *Assessing landscape value outside national designations* (2021)) would have been best practice. However, there is an assessment of landscape value for each of the LCAs/Character Areas which can be found in Section 5.2.3.2 *Local Landscape Character*. The assessments make reference to distinctive features, natural and cultural heritage, physical condition, sense of identity, tranquillity and recreational use. This covers the main attributes recommended for consideration by TGN 2/21.
33. The LVA concludes that the Great Ouse Valley LCA has high value. I consider that this makes the LCA, or parts of it, likely to be a valued landscape. In 2023 the site was partly located within the Great Ouse Valley LCA. After the HDC SPD was adopted the site and the whole of Site Allocation SI 1 was removed from that LCA and now belong in the Western Periphery Character Area. I consider that the removal of Site Allocation SI 1 from the Great Ouse Valley LCA is indicative of the fact that this area is not likely to be considered a valued landscape.
34. I consider that the effects on the Great Ouse Valley LCA will be negligible due to existing screening and the distance between the area for development and the LCA. I do not therefore consider that whether the Great Ouse Valley LCA is a valued landscape or not makes a material difference to the landscape and visual effects of this application.
35. I consider that the landscape effects on the Western Periphery Character Area would be greater than the LVA concludes ((Medium adverse in Year 1 and Minor adverse by Year 15). However, I consider that this is within the usual margin of professional differences and do not consider that these landscape effects are likely to represent a reason to refuse the application.

- v. **In view of the Parish Council's concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful - There have been no additional viewpoints included in the 2025 LVA.**
and
- vi. **The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered - No additional viewpoints have been considered in the 2025 LVA.**

36. I consider that there are sufficient viewpoints and visualisations to be able to reach a conclusion as to the visual effects of the development. I agree with both the LVA and Peter Radmall that there will be a very noticeable visual change from Houghton Road. However, I do not consider that these visual changes will appear out of character or unacceptably intrusive because:

- I consider that the site is already perceived as being within St Ives, within the Western Periphery Character Area,
- The site faces the Slepe Meadow estate to the north of Houghton Road
- The access road to Houghton Grange Phase 1 runs through the site and
- The site is already influenced by the road widening and traffic lights associated with the SI 1 Allocation.

- vii. **Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable.**

37. I agree with Peter Radmall that there is some inconsistency between the sensitivity ascribed to different receptors but I do not consider that this has resulted in a significant underestimation of the visual effects of the development which I do not consider are likely to represent a reason to refuse the application.

Other Matters Raised by Houghton and Wyton PC

38. The proposed development has been pulled back from the main road and I consider that this is an improvement over the original application. I do not consider that it is too close to the main road and, in combination with the Eastern Open Space, it should be possible to maintain an attractive green gateway to the town.
39. Most of the points in Sections 2 and 3 of the 28/02/25 objection letter from Houghton and Wyton PC are based on the assumption that the development is located in the gap between St Ives and Houghton and Wyton. For example that the proposed density would increase *‘the perception of coalescence as it will look, feel and actually become views as an extension to the Spires and therefore to the town itself.’* (Section 3) I agree that the development will appear as an extension to St Ives but, as set out above, I consider that this is due to development that has already taken place rather than to the development proposed in this application.
40. Peter Radmall raised some issues with regard to the design of the eastern open space. The children’s play area that was introduced in the December 2024 parameters plan has now been removed. It will be for HDC to approve the actual design of the eastern open space and I agree with others, such as Peter Radmall, that it should be kept as rural in character as possible. This is appropriate for its function to provide a green wedge in the urban fabric of St Ives, linking Houghton Road with the Ouse Valley open space. Only one of the routes through the eastern open space is proposed as a cycle and pedestrian route. It is therefore possible that other pedestrian routes can remain low key, e.g. mown grass paths.



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**Land off Houghton Road,
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Review of
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Prepared for
**Huntingdonshire
District Council**

Application Ref
23/00627/OUT

April 2024



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Prepared by:

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Position:

Director

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Date issued:

25th April 2024

Status:

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3	The proposed development	11
4	Conclusion	13

APPENDICES

Appendix 1 Figures

Figure 1 Site location

Figure 2 Aerial Photograph & Existing Developments

Figure 2 Aerial Photograph & Proposals

Figure 4 Annotated Masterplan

Appendix 2 Figure 7.1 St Ives Character Areas from Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022

1 Introduction

- 1.1 Michelle Bolger Expert Landscape Consultancy (MBELC) has been instructed by Huntingdonshire District Council HDC to prepare a review of an application for up to 120 homes on land west of St Ives. The application is described by the applicant as Houghton Grange Phase 2 and as Houghton Grange Field, the review describes it as Houghton Grange Field.
- 1.2 The site is located within the St Ives West (SI 1) Allocation in the 2019 Local Plan. The allocation is described as follow:
54ha of land south of Houghton Road (A1123) to the west of St Ives, including land within the parish of Houghton and Wyton, is allocated for a mix of uses to comprise:
- 1. approximately 23ha of green space*
 - 2. approximately 400 homes*
 - 3. social and community facilities to meet needs arising from the development*
- 1.3 The St Ives West Policy (SI 1) lists a number of requirements that successful development of the site will require which include: *‘a landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires.’*
- 1.4 Allocation site SI 1 includes three other developments as well as this application; The Spires to the east, The How to the east and south east, and Houghton Grange to the west (Figures 1 and 2). The current application forms part of the Houghton Grange developments.
- 1.5 Figures prepared to support this review can be found in Appendix 1.
- 1.6 The planning application was accompanied by a Landscape and Visual Appraisal (LVA) dated Feb 2023 (the original LVA) prepared by Aecom on behalf of Homes England. A revised LVA was issued in 2024. Although it has DRAFT on the title page it is assumed that it is the final version.

- 1.7 The Revised LVA was prepared in order to include winter photograph as the original LVA only included summer photography. In addition to the winter photography other significant changes are updates to reflect the HDC Landscape and Townscape Supplementary Planning Document (2022) and the inclusion of some more distant viewpoints as raised by a consultant on behalf of Houghton and Wyton Parish Council. NPPF references have also been updated but with regard to landscape matters there have been no substantive NPPF changes.

2 Separation between St Ives and Houghton and Wyton

Introduction

- 2.1 In my review of the application I have identified a key conflict in the various relevant documents. Houghton Grange (including the application site) is located within Houghton and Wyton parish. However, the conflict that has arisen is whether Houghton Grange (including the application site) still belongs to the village of Houghton and Wyton in terms of its character, or whether it is now more closely related to the town of St Ives.
- 2.2 The Houghton and Wyton Conservation Area (CA) includes the main part of what was the Houghton Grange research facility, but not the majority of the application site. At the time the CA was designated it is assumed that the research facility was still operational. By the time of the CA appraisal (2012) it was no longer operational. I am not aware of any subsequent amendments to the CA boundary following the grant of planning permission, the 2019 Local Plan allocation or the construction of Houghton Grange Phase 1.

Houghton and Wyton Neighbourhood Plan

- 2.3 Policy HWNP3 - Anti -coalescence in the Houghton and Wyton Neighbourhood Plan (NP) (2018) makes clear that historically ‘the land ... separating Houghton & Wyton from St.Ives has comprised that land extending east of Houghton Grange and being made up of the St.Ives Golf Course, BBSRC¹ Field and Thicket Wood.’² The BBSRC field is roughly equivalent to the application site. The NP considers that as a result of recent development ‘the BBSRC field occupies the only undeveloped frontage adjoining the A1123’³ and is therefore essential to ‘ensuring anti coalescence’⁴

¹ Biotechnology and Biological Sciences Research Council

² Houghton and Wyton Neighbourhood Plan Paragraph 5.5

³ Houghton and Wyton Neighbourhood Plan Paragraph 5.9

⁴ Houghton and Wyton Neighbourhood Plan Paragraph 5.28

- 2.4 The Houghton and Wyton NP acknowledges that there is a tension between the aim of preventing coalescence and the fact that 400 houses are allocated in the Core Strategy to the west of St Ives. The NP accepts that the Local Plan, which was emerging at the time the NP was written, would make the decision about where exactly they would be located.⁵ As set out in section 1 above the BBSR field subsequently became part of allocated site SI 1 in the 2019 Local Plan.

Huntingdonshire Landscape and Townscape Supplementary Planning Document

- 2.5 In 2022 the Huntingdonshire Landscape and Townscape Supplementary Planning Document (HLT SPD) 2022 was adopted. This document which updated the earlier Huntingdonshire Landscape and Townscape SPD (2007)⁶, was subject to public consultation between 15 October and 10 December 2021.⁷
- 2.6 Section 7 of the HLT SPD is The St Ives Spatial Planning Area. It is divided into 13 character areas and Character Area 11 is Western Periphery. This is shown on Figure 7.1 in the HLT SPD which has been included in Appendix 2 for ease of reference. This area extends westwards from the western edge of St Ives. North of Houghton Road it includes the Garner Drive development which was approved in 2007. South of Houghton Road it includes The Spires, and extends westwards to include all land between The Spires and Houghton Grange Phase 1. The site is located in the centre of the Western Periphery Character Area.

⁵ Houghton and Wyton Neighbourhood Plan Paragraph 5.29

⁶ Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Paragraph 1.8

⁷ Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Document Information Page i

- 2.7 The HLT SPD acknowledges that allocation site SI 1 is within Houghton and Wyton parish but considers that it forms part of the St Ives Spatial Planning Area⁸. I agree with this conclusion on the basis of the current landscape townscape character. The reasons site SI 1 belongs in character terms to St Ives are:
- The Garner Drive development extends the edge of St Ives westwards north of Houghton Road. It ends immediately before the Houghton Grange Phase 1 development begins south of the road. The development is clearly urban in character and part of St Ives.
 - The access road for Houghton Grange Phase 1 is located opposite the access to the Garner Drive development.
 - Road widening and traffic signals at the access road for Houghton Grange Phase 1 contribute to the urban character.
 - The Houghton Grange Phase 1 development is also urban in character due to its density but it does not suggest the start of Houghton and Wyton village or that it is a rural development.
- 2.8 Although the Houghton Grange Phase 1 access road currently appears to run through an open field it in fact reflects the location of built development on the application site which has since been demolished. Figure 4 shows the location of the demolished buildings in relation to the proposed development.
- 2.9 When it was a research facility Houghton Grange was located in the countryside between St Ives and the village of Houghton and Wyton. The employment use of the research facility, clearly non-residential, would have reinforced the fact that it was not part of St Ives. At the same time the Houghton and Wyton NP acknowledges that it is not part of the village *‘This site is detached from the core village’* but hopes that *‘when developed (it) will be large enough to create its own built up area.’*⁹ I do not consider that this is what has actually happened.

⁸ Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 Paragraph 7.61

⁹ Houghton and Wyton Neighbourhood Plan paragraph 5.19

- 2.10 The How development in addition to The Spires has brought the urban edge on the west side of St Ives closer to the Houghton Grange facility and there is also now a consistency of landuse (relatively dense residential development) where previously there was a mix of landuses including employment, agricultural use and golf course. In addition the access road to Houghton Grange Phase 1 is clearly urban in character and houses within Houghton Grange Phase 1 are visible. These are all factors that have increased the connection between Houghton Grange Phase 1 and St Ives.
- 2.11 These factors, compounded with the road widening, the traffic signals, and the Garner Drive development now tie Houghton Grange Phase 1 to the existing urban edge of St Ives as recognised in the HLT SPD. Houghton Grange Phase 1 is not perceived as part of the village of Houghton and Wyton, nor is it perceived as its own detached built up area as hoped for by the Houghton and Wyton NP.
- 2.12 To the west of Houghton Grange Phase 1 there is still a clear transition before the village proper begins. North of the road (within a different parish) there is open agricultural fields. To the south is parkland historically connected to Houghton Hill House (19th Century Grade II). A mature hedgerow with trees, and then an area of woodland which runs alongside Houghton Road, limit views into the parkland which, from aerial photographs, appears to be currently partly grassland and partly in arable use.
- 2.13 Beyond the grounds of Houghton Hill House are a number of large properties with large gardens set back from the road. Most have substantial planting in their front garden, generally of an ornamental character and the houses are only visible from the road through driveways. About 650m west of the western edge of Houghton Grange Phase 1 development becomes more suburban with the Hill Estate which is signed as the beginning of the village of Houghton and Wyton.
- 2.14 The historic centre of Houghton and Wyton is located approximately 1km from the western edge of Houghton Grange Phase 1. Figure 3 in the Houghton and Wyton Neighbourhood Plan, March 2018 includes Houghton Hill House and the large properties on Houghton Road with large gardens as part of the '*Core built up area of the village*', with Houghton Grange considered as a separate area. However, I consider that Houghton Hill House and the large properties on Houghton Road are not perceived from Houghton Road as being part of the core built up area. Instead they are typical of large dispersed properties found on the periphery of a village .

Current conflicting intentions

- 2.15 The Allocation site SI 1 included both the western edge of the St Ives and the Houghton Grange facility. It includes a requirement to maintain a sense of separation between developments at Houghton Grange and The Spires, which then represented the westernmost edge of St Ives. However, it does not identify this as a sense of separation between St Ives and Houghton and Wyton. The proposed development does maintain a sense of separation between the Houghton Grange developments and The Spires, but this will not function as a separation between St Ives and Houghton and Wyton as desired by Policy HWNP3 of the Houghton and Wyton NP. This is not as a result of the current development but because Houghton Grange Phase 1 already reads as part of St Ives for the reasons set out above.
- 2.16 It is a requirement of Houghton and Wyton NP HWNP3 that '*Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives.*' It goes on to correlate this with the physical separation of the two settlements. I consider that the development proposed will not further diminish the individual and distinct identities of the two settlements because Houghton Grange Phase 1 now has more in common with St Ives than with the open countryside or with Houghton and Wyton, and the distinct change in character between the two settlements now occurs west of Houghton Grange Phase 1. This will not change with the application proposals in place.

3 The proposed development

Set Back

- 3.1 The proposed development will be identified with the western edge of St Ives. Recent development on the south side of Houghton Road is already developing a specific character which this development should reflect. A key aspect of this is a generous set back from Houghton Road, to include the tree lined approach set out in Policy SI 1. Given the road widening and visibility splays for the access road I consider that the properties facing Houghton Road would benefit from being set back further from the road than is shown in the illustrative masterplan.

Separation from the Spires

- 3.2 Development in The How now extends further west than development in The Spires. As set out above, I do not consider that the area of separation allowed for in the illustrative masterplan will be read as separation from Houghton and Wyton. However, I do consider that it will have a positive role to play in providing both physical and visual access from Houghton Road to the large area of accessible open space along the Great Ouse Valley which has been extended as part of previous developments and would be extended further as part of this this development. The separation has to be sufficient to allow a perception from Houghton Road that there is an open undeveloped landscape beyond. It should also create the sense of an entrance rather than appearing to be left over from the development.
- 3.3 The current existence of the access road allows an appreciation of the area of separation that will remain. The space that currently exists between the access road and the western edge of St Ives would be preferable to reduced space shown on the illustrative Masterplan. A key pinch point is between the south eastern corner of the development and the western extent of The How. Increasing this gap by pulling back the development in the south eastern corner would be desirable.

Revised Landscape and Visual Appraisal (LVA)

- 3.4 The assessment of landscape and visual effects in the Revised LVA is fair. The HLT SPD 2022 removed the site from the Great Ouse Valley LCA and assessed it instead as being within the St Ives Western Periphery. I assume this was a response to the site allocation but, even without the allocation, the part of the site proposed for built development is not representative of the Great Ouse Valley LCA. I agree with the LVA that there will be no significant adverse effects on the landscape character of the St Ives Western Periphery.
- 3.5 The southern part of the site which is proposed for accessible open space provides a good transition from the valued landscape of the Great Ouse Valley to the urban edge of St Ives. The proposed developed will be visible from this area, although currently will not be visible from areas with public access. I agree with the LVA assessment that there would be no change to the character of the Great Ouse Valley LCA.
- 3.6 There will be no clear visibility of the development from areas which are currently accessible to the south of the site. Viewpoint 5 in the LVA appears to be taken from beyond the northern edge of St Ives Thicket from a location not accessible to the public. From the accessible paths within the thicket visibility will be significantly more filtered.
- 3.7 Whilst the development will be clearly visible from Houghton Road (LVA Vp 6) it will read as part of the urban area defined by Garner Drive and Houghton Grange Phase 1. However, as the visualisation from Vp 6 indicates, restricting development east of the access road would help to maintain a greater sense of connection to the open landscape to the south.
- 3.8 I do not consider that there would be any significant views from the wider viewpoints which have been assessed in the Revised LVA.

4 Conclusion

- 4.1 The application site is within allocated site SI 1. It is the last of a series of developments within that allocation and is located on a field previously associated with the research facility at Houghton Grange . There are conflicting views on whether Houghton Grange belongs to Houghton and Wyton village (it is within the village CA), or to the new western periphery of St Ives (HLT SPD). I consider that the Houghton Grange site now reads as part of St Ives due to:
- The change in character to the Houghton Grange site as a result of the Houghton Grange Phase 1 development, including the access road across the application site ;
 - The spread of development from the edge of St Ives on both sides of Houghton Road; and
 - Road widening and associated traffic lights.
- 4.2 The Houghton and Wyton NP Policy HWNP3 seeks to retain the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. The NP considers that the field in which the application site is located makes a significant contribution to this separation. I consider that for the reasons given above the field no longer has a significant role in retaining the individual and distinct identities of the settlements and that the perception of a change in character now begins west of Houghton Grange Phase 1. I do not consider that the application proposals will affect the individual and distinct identities of the settlements.
- 4.3 The St Ives West (SI 1) allocation in the 2019 Local Plan requires that a sense of separation is maintained between developments at Houghton Grange and The Spires. This sense of separation is important in maintaining an appreciation of the open landscape of the Great Ouse Valley to the south from Houghton Road and providing attractive access to it. That sense of separation would be more clearer defined if the development did not extend as far to the east and if a pinch point with The How Development was relaxed.
- 4.4 The LVA provides a fair assessment of the landscape and visual effects of the development.

APPENDIX 1

Figures

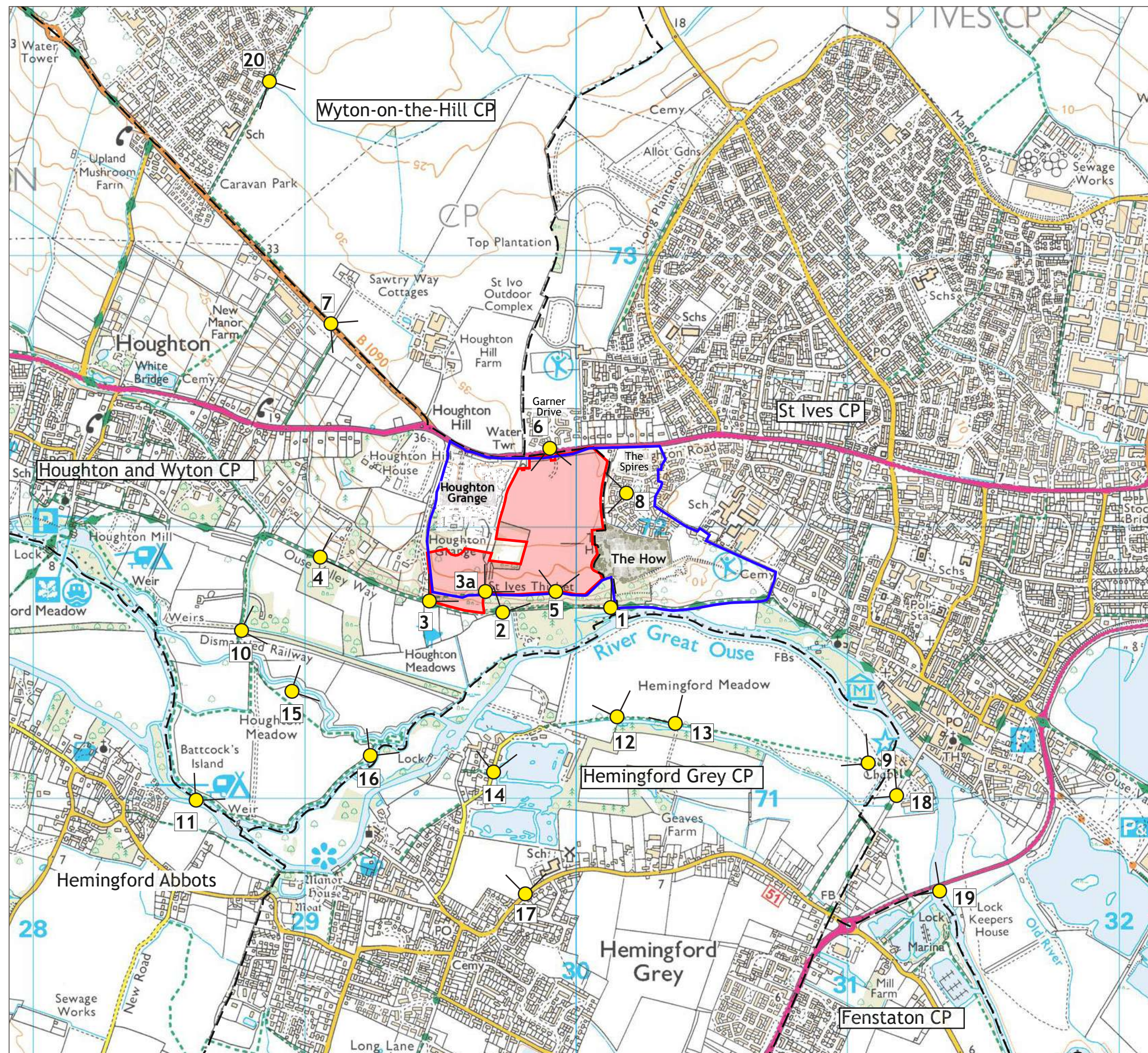


FIGURE 1
Site Location



PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Huntingdonshire Local Plan Allocation
SI 1 St Ives West
- Parish Boundary
- Location of LVIA Viewpoints 1-19

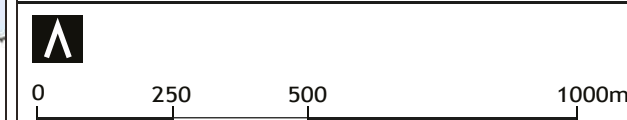




FIGURE 2
*Aerial Photograph &
Existing Developments*






PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

-  Site
-  Huntingdonshire Local Plan Allocation
SI 1 St Ives West
-  Public Footpath 132/10 (Ouse Walley Way)

Aerial Photograph: Google Maps, March 2024

Houghton Grange:
Landscape Structure Plan, M3130-PA-01-V06

The How:
Proposed Site Layout Plan,
437/18/FUL/PH1/PL1002 Rev. C



0 125 250 500m



FIGURE 3
Aerial Photograph & Proposals






PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

-  Site
-  Huntingdonshire Local Plan Allocation
SI 1 St Ives West
-  Public Footpath 132/10 (Ouse Walley Way)

Aerial Photograph: Google Maps, March 2024

23/00627/OUT Site Masterplan:
Illustrative Masterplan, Rev 01, AECOM

Houghton Grange:
Landscape Structure Plan, M3130-PA-01-V06

The How:
Proposed Site Layout Plan,
437/18/FUL/PH1/PL1002 Rev. C



0 125 250 500m



FIGURE 4
Annotated Masterplan



PROJECT
1173
Houghton Grange, St Ives

CLIENT
Huntingdonshire District Council

DATE
March 2024

Legend

- Site
- Location of original buildings, now removed
- ↔ Pinch point

23/00627/OUT Masterplan:
Illustrative Masterplan, Rev 01, AECOM

Location of original buildings:
Derived from Appendix A, Tree Constraints Plan,
Rev P04, AECOM



0 50 100 200m

APPENDIX 2

Figure 7.1 St Ives Character Areas

from

Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022

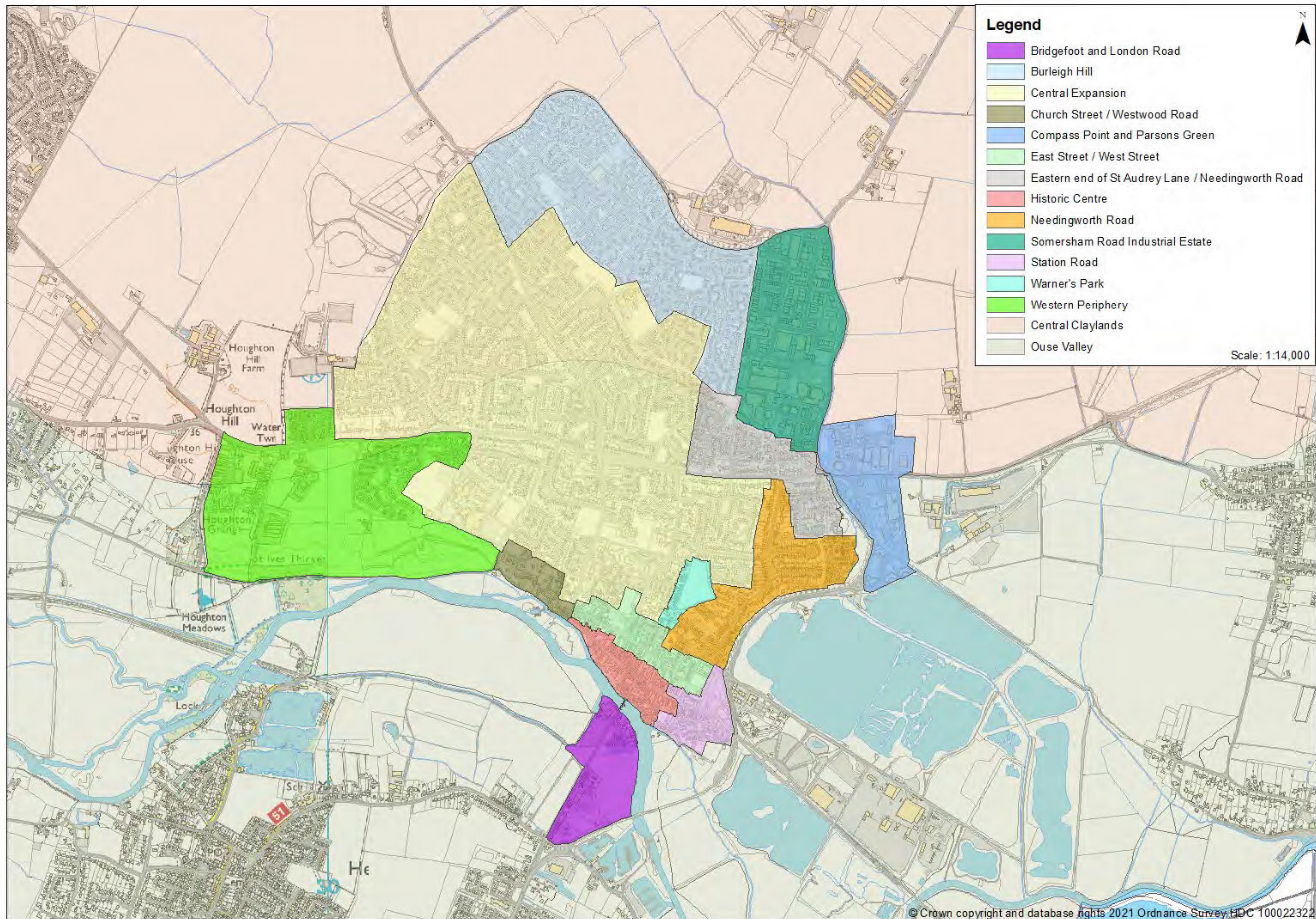


Figure 7.1 St Ives Character Areas



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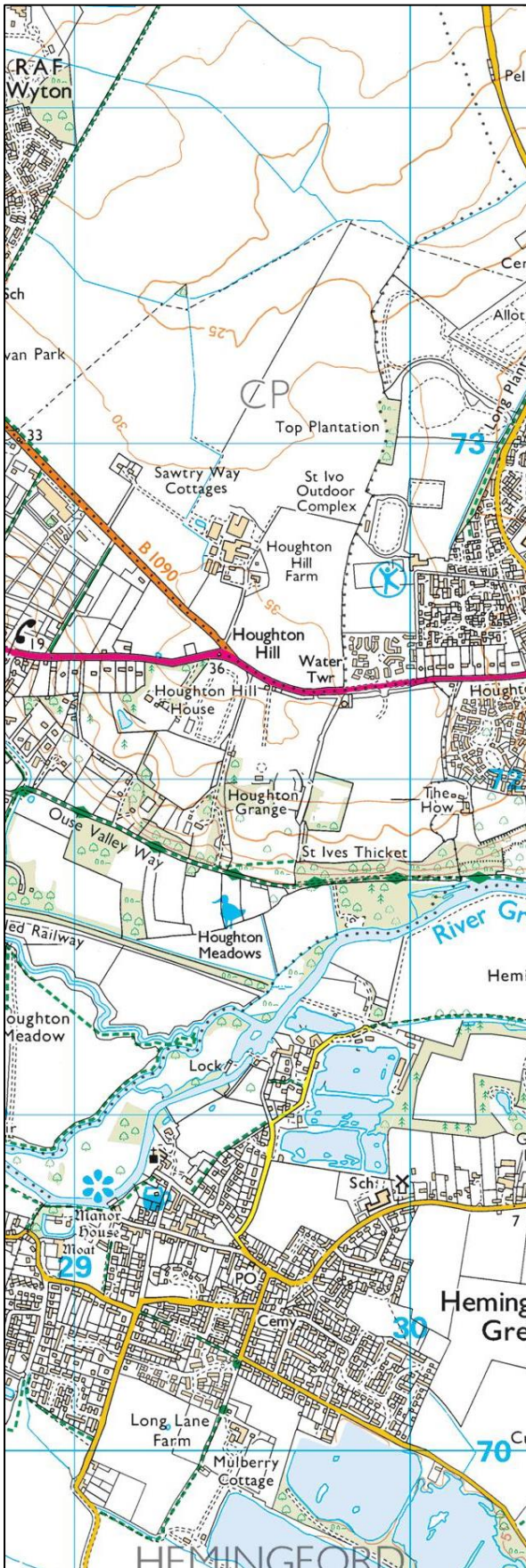
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Date issued: 19th November 2024

Status: Final

Amended Application

Introduction

1. In April 2024 Michelle Bolger Expert Landscape Consultancy (MBELC) prepared a review of an application 23/00627/OUT for up to 120 homes on land west of St Ives for Huntingdonshire District Council (MBELC Review). This was a February 2024 revision (Revised Application) of an original application which had been submitted in 2023. In September 2024 the Applicant submitted an amended application (Amended Application) which has addressed some of the issues raised in the MBELC Review.
2. The amendments are set out in the Amended Design and Access Statement (ADAS) and they can be summarised as follows:
 - Changes to the Houghton Road Frontage;
 - Changes to the eastern edge of the development;
 - Changes to the development footprint; and
 - Changes to public open space (POS) within the development.
3. An Amended Landscape and Visual Appraisal (LVA) has been submitted but it appears to be the same LVA that was submitted with the Revised Application in February 2024, the only difference being that it has a new Homes England front cover dated September 2024. We did not raise any issues with the adequacy of the Revised Application LVA or the judgments it contained and have not reviewed it again.

Houghton Road Frontage

4. There have been two key changes in the Amended Application to the Houghton Road frontage:
 - A lower density approach along the Houghton Road frontage has been adopted with the larger buildings shown on the Parameters Plan (Rev 04 dated 13/01/23) omitted from the frontage area. The Amended Parameters Plan (Rev 06 dated 08/08/24) shows the heights of buildings to the east of the access road heights are *'up to 8.5m maximum building height to ridge line from finished ground level.'*¹
 - The buildings have been pulled back from Houghton Road *'between 19m and 22m to the west of the access road and between 45m and 60m to the east of the access road.'*²
5. Both these changes are welcome. They will enable a tree-lined character for Houghton Road to be established as required by Policy SI 1, and they will help to soften the urbanising effect that has already occurred due to the road widening and signalled traffic junction.
6. It is not clear why the restriction to 8.5m height is not shown as continued along the edge of Houghton Road west of the access road. Given that both sides of the access road are identified as having no more than 23dph, it would seem appropriate for the 8.5m height to extend along the whole of the frontage.

Eastern Edge of Development

7. There are three changes in the Amended Application along the eastern edge of the development area:
 - Building heights are restricted to *'up to 8.5m maximum building height to ridge line from finished ground level'*³;
 - Additional woodland planting is proposed along the edge, within the open space that lies east of the development area; and
 - The south eastern corner of the proposed development area, where it is closest to new development at the How, has been pulled back.

¹ Amended Parameters Plan

² Amended Design and Access Statement Page 2

³ Amended Parameters Plan

8. These changes to the eastern edge of the development will help to strengthen the sense of separation between the proposed development area and the new housing development, on Houghton Road west of the Spires, and at The How.

Development Footprint

9. The changes to the Houghton Road frontage and the eastern edge of the development in the Amended Application have reduced the overall built development area (from 4.93 ha to 4.45 ha) but the number of dwellings has remained at up to 120. It is assumed that this has been achieved by increasing the density in the more central parts of the site. As set out above the changes along Houghton Road and the eastern edge of the development are welcomed.
10. Without detailed proposals it is difficult to know whether the increased density towards the centre of the proposed development would increase adverse landscape or visual effects. However, the reduction in footprint without a reduction in numbers will inevitably increase the overall density and this may detract from the sense of a village character from Houghton Road approach that the DAS (Page 2) says the changes are seeking to achieve. HDC's urban designer may wish to comment further on this.

Public Open Space (POS)

11. POS within the Amended Application has been reorganised to create a north-south linear POS rather than a central park. This is an outline application and the linear POS is indicative only, however, given the attractive and accessible landscape that lies to the south of the proposed development, creating welcoming access routes to it is desirable.
12. The ADAS also refers to proposed 'Green Avenues' which are '*envisaged to be located within the development area and the eastern open space and to be composed of a line of trees indicating the north-south connection from Houghton Road in the north to the open space and the St Ives Thicket to the south.*' The intention here is welcomed however, it is not entirely clear where they are to be located. I assume the Parameters Plan is the means by which they are '*to be secured by the outline planning application.*' The Parameters Plan shows a single '*Proposed Green Avenue (street with trees on both sides)*' and two '*linear green spaces*' all within the development area. There is no '*Green Avenue*' shown within the Eastern Open Space.

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13. I would expect the '*Green Avenue*' within the open space to be different in character to a '*Green Avenue*' that is internal to the development. Some more detail is required with regard to the location of the '*Green Avenue*' within '*the eastern open space*' and its character.

Summary

14. The amendments to the application are welcomed from a landscape and visual perspective. It would be desirable if:
- The height restriction to 8.5m was extended west of the access road and therefore encompassed the whole of the Houghton Road frontage; and
 - More detail was provided with regard to the location and character of the '*Green Avenue*' within '*the eastern open space*.'



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ISO A1 594mm x 841mm
Approved: JH
Checked: NS
Designer: SP
Project Management Initials: PARAMETER PLAN/DWG
Last saved by: HOORIEH.MORSE/2025.04.02
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Application Site Boundary

For context

- Houghton Grange Phase 1 masterplan (19/01180/REM)
- The How masterplan (19/02280/FUL)
- Water main and 5m easement
- Foul water rising main and 3m easement
- Consented Houghton Grange Phase 1 SuDS pond

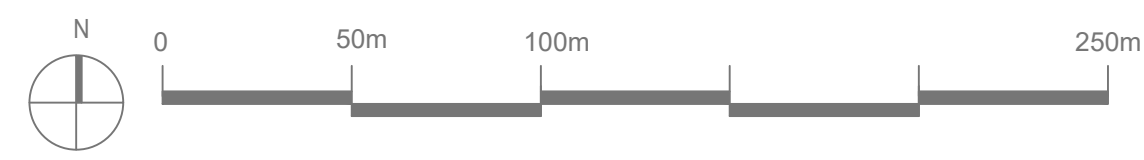
- Consented Houghton Grange Phase 1 Access Road
- Existing primary access point
- Existing & consented cycle/pedestrian routes
- How Masterplan consented cycle/pedestrian routes
- Existing trees to be retained

For approval

- Development area up to 10m maximum building height to ridge line from finished ground level
- Development area up to 8.5m maximum building height to ridge line from finished ground level
- No more than 23dph, calculation based on the extent of hatched area
- Proposed tree area
- Houghton Road frontage tree planting
- Highway verge (with breaks for access roads and private drives)
- Indicative location for linear green space
- Proposed open space

- Proposed street trees (with breaks for access roads and private drives)
- Proposed tree line along the edge lane
- Proposed SuDS Pond (maximum extent of water)
- Indicative location for proposed community garden/orchard
- Up to 15m tolerance either side applies to the following features to allow for detailed design. Precise locations and details of the following to be confirmed at detailed design at reserved matters stage.
- Proposed pedestrian access points
- Proposed shared cycle/pedestrian access points
- Proposed shared cycle/pedestrian routes
- Proposed pedestrian routes

- Indicative location of Local Equipped Areas for play (LEAP)
- Indicative location of informal play area



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PROJECT
HOUGHTON
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GENERAL NOTES

ISSUE/REVISION		
08	03.04.2025	GENERAL AMENDMENTS
07	19.12.2024	GENERAL AMENDMENTS
06	08.08.2024	GENERAL AMENDMENTS
05	19.06.2023	DIMENSIONS ADDED
04	30.01.2023	FOUL WATER RISING MAIN
03	15.12.2021	GENERAL AMENDMENTS
02	16.09.2021	AMENDMENTS POST PRE-APP
00	15.06.2021	FIRST ISSUE
I/R	DATE	DESCRIPTION

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PROJECT NUMBER
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SHEET TITLE
PARAMETER PLAN:
FOR APPROVAL
SHEET NUMBER
003

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GENERAL NOTES

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