

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

18<sup>th</sup> July 2025

Dear Sirs

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

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

1. We are instructed by Houghton & Wyton Parish Council and write following the publication of the Officer's Report (“**the OR**”) on 9 July 2025.
2. This letter is intended to supplement our previous objections to this Application, and we do not intend to replicate the points made within it. However, we want to draw to Members attention the irrational and unlawful way in which the Officer Report has addressed one of our key concerns. The fact this letter focuses on that principal issue does not negate the other issues raised in our objection and we would ask Members to give those concerns significant weight to support refusal.
3. It would assist to firstly re-set out our key concern about the quantum of development and the associated policy conflict that arises from the unnecessary over-development of the Application Site. We will then explain how the Officer Report has unlawfully approached the issue.

*The Key Concern: the overdevelopment of the Site*

4. The Parish Council have long made it clear that they are not against the in-principle development of the Site for housing of up to 88 dwellings. We recognise that the Site is allocated in the Local Plan Policy SI 1. However, we are strongly against the over-development of the Site to provide an extra 32 houses (or 120 in total). This is not a technical breach of policy: given the sensitive nature of the Application Site the over-development carries real world planning harm which we will outline below.
5. The starting point is the interpretation of Policy SI 1 which allocated the larger ‘St Ives West’ Site for approximately 400 homes. There are three important elements of the policy we wish to highlight.

6. The first is the allocation of the entire wider allocation site (**'the Allocation'**) for approximately 400 homes. It is right that the supporting text to Section D Allocations notes that there is a 10% tolerance either side of the approximate figure (i.e., up to 40). But critically the supporting text at D9 goes onto note "*All housing capacities should be design-led*".
7. The relevance of this is reflected in parts a and b of SI 1:
  - a. *completion of a detailed master planning exercise to be agreed with the Council*
  - b. *design codes or conceptual appearance of development proposals*
8. The point being that SI 1 envisaged and intended that the housing capacity of the wider St Ives West Site would be identified through a design-led detailed masterplan process which spread the housing across the wider Allocation in a joined-up and coherent manner.
9. What SI 1 did not envisage – and cannot be interpreted as allowing – is that the 10% tolerance would be viewed as allowing for 440 homes on the Allocation regardless of their distribution thus allowing for one part of the Allocation to be overdeveloped with the entire tolerance placed there.
10. However, this is exactly what has occurred. The failure – still unexplained – of the Council to require a joined up detailed masterplan approach across the Allocation (as required by the Policy) has led to other elements of the wider Site coming forward without regard to what would be proposed on the rest of the Site.
11. But this failure does not justify the Applicant concentrating housing on the last remaining part of the Allocation (BBSRC Field) to 'max out' the numerical tolerance of 440. This is contrary to the design led approach required (per D9), the required detailed master planning and design code approach (SI 1 a and b), and contrary to the sensitive approach to development enshrined in SI 1 as recognised by the supporting text at 11.3.
12. The second relevant element of SI 1 is the requirement for any development to maintain separation between settlements and thus ensure there is anti-coalescence. This is enshrined at SI 1 g:
  - a *landscape scheme design recognising vistas, boundaries and the surrounding green infrastructure network, to be particularly focused on restoring the tree lined approach on the south side of the A1123 and maintaining a sense of separation between developments at Houghton Grange and The Spires*
13. Given the layout of the Allocation the separation between Houghton Grange (which sits at the westernmost portion of Allocation adjacent to Houghton and Wyton village) and The Spires (which sits at the easternmost portion of the Allocation next to St Ives) can only be interpreted as being a requirement to maintain the separation between those two settlements.
14. This is consistent with Policy HWNP3 – Anti-coalescence of the Neighbourhood Plan which requires that:

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

15. The supporting text to this Policy makes clear at 5.28 and 5.29 that while the BBSRC Field is at the heart of the area essential to ensuring anti-coalescence, it was also recognised that the area was allocated (and would be allocated in the emerging local plan) and so a balance would have to be achieved.
16. The point being that the Neighbourhood Plan was aware of allocation SI 1, and the Local Plan was clearly aware of Policy HWNP3 (given it pre-dated it), and the need to strike a balance. Requirement g of Policy SI 1 is the striking of that balance. A point underscored by the fact that Section D sets out in a policy box at D.3 that any allocation does not guarantee permission will be granted and any proposal will have to satisfy "*any relevant policies in a 'made' neighbourhood plan covering the site area*".
17. Policy SI 1 g and HWNP3 are entirely consistent and are aimed at achieving the same goal: the preservation of the separation between Houghton and Wyton and St Ives. This is confirmed by the Examiner's Report into the Local Plan which noted at 7.9 that SI 1 g provides "*sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected*".
18. The third relevant element of Policy SI 1 – which underlines and supports the second element – is the recognition that different parts of the Allocation will form part of either St Ives or Houghton and Wyton:

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

Emphasis Added

19. The point being that it is not the case that policy envisages that the entirety of the Allocation would become part of St Ives. Instead, it recognised – due to the complex nature of it – that western parts would become part of the Built-Up Area of Houghton and Wyton and eastern parts would become part of St Ives. This is consistent with policy HWNP1 which incorporated the Houghton Grange Site into the built-up area of the Village and so would naturally encompass the adjacent BBSRC Field (i.e this Application Site).
20. To gain support from Policy SI 1 (and the policies of the Neighbourhood Plan which are consistent with it) any development of the Allocation would have to sustainably spread housing across the Allocation in a joined up master planned and design led way which maintained the separation between the two settlements.
21. What it does not allow is what is proposed here: which is the over-development of the Application Site by maximising the numerical tolerance of the wider allocation to concentrate housing on the most sensitive part of the allocation. Such an approach is in fundamental conflict with Policy SI 1.
22. This has real world planning consequences.

23. Firstly – as set out in [REDACTED] Separation Report and reiterated in his 2025 LVA Appraisal – the overdevelopment of the Application Site erodes the critical separation between Houghton and St. Ives. The simple point being that the more houses that are placed on the last remaining part of the allocation between the settlements the more the gap is eroded. While 88 homes strikes the balance envisaged by the Neighbourhood Plan, the increase by a third to 120 does not.
24. As set out by [REDACTED] the increased bulge of development – shown on the Parameters Plan – reduces the gap by two-thirds and sub-urbanises the peripheral and transitional character of the gap.
25. Secondly, the increase in housing leads to an associated increase in the density of housing. The density of the Application Site would – with the additional housing – be at 36dph. This is entirely out of character with the village itself and Houghton Grange Phase 1 (which is at 16 dph), and with the wider approach taken by the Council for edge of small village settlements which seeks a density of 25 dph. This is reflected in numerous documents produced by the Council as part of the recent Local Plan call for Sites such as the New Local Plan Land Availability Assessment Sept 2024.
26. Thirdly, the increase in housing above what is sustainable removes land which could be used for vital village community infrastructure such as a second LEAP or MUGA, and generates additional traffic further stressing junctions of the A1123 which are already over capacity.
27. Finally, it is critical to note that there is no commercial imperative for delivering high density development in this location. There is no suggestion the Scheme would be unviable at 88 dwellings and so it is unclear what rationale exists for maximising housing on this above in a manner so contrary to the Local Plan and Neighbourhood Plan.
28. **In short the 36dph is a fundamental and unjustified departure from the approach to housing in this part of the district. It is unnecessary to provide a fair return to Homes England. It smacks of greed at the expense of the local community and the residents who will be affected.**

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

29. We advised officers of our intent to raise legal issues that could form the basis for a judicial review.
30. We have significant concerns with the way in which Officers have attempted to circumvent these issues in the Officer Report.
31. The Report deals with the interpretation and accordance with Policy S1 at the 'Principle of Development' sub-heading.
32. At 7.22 – 7.23 the Officer concludes that the Application accords with SI 1 through reliance on the 10% tolerance. But the Officer, while partially quoting from D8 at 7.22, does not quote the requirement that housing capacities should be “*design-led*” and instead treats the 440 as an acceptable maximum for the Site which justifies any level of housing under it.
33. That is plainly a misinterpretation of policy as it fails to recognise that Policy SI 1 required any housing figure to be design-led via the envisaged master planning and design code

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

34. This point is then missed in the Officer's Report at 7.25 where the Officer deals with the – unexplained – lack of adherence to criteria a and b. The significance of these requirements is they illustrate the need for a joined-up approach to the Allocation which is lacking and the failure to accord with this element of the policy cannot justify over-developing one area of the allocation simply because it is the last opportunity to do so.
35. At 7.28 – 7.29 the Officer Report alleges that there is a tension between HWNP3 and the Local Plan. This is entirely wrong and irrational. It is an attempt by Officers to circumvent the clear conflict that arises from SI 1 g and HWNP3 which are consistent in seeking a separation be achieved between Houghton and St Ives.
36. As set out above while the policies use different language (the Neighbourhood Plan referencing Houghton and St Ives vs the Local Plan referencing Houghton Grange and The Spires) they are clearly both concerned with protecting the same separation as Houghton Grange is on the Houghton side of the allocation and The Spires on the St Ives side. This straightforward and common-sense interpretation is confirmed by the Examiner's Report into the Local Plan which noted this policy would "*provide a sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected*".
37. Members should be particularly concerned about the attempt by the Council to circumvent the conflict that arises from SI 1 g and HWNP3 by misinterpreting the former and dismissing the latter on the basis of a policy tension that does not exist. This reflects the fact that the Application – due to its overdevelopment – is eroding the separation between these settlements and such conflict is weighty enough to justify refusal.
38. Linked to this point is the Officer Report's reliance on the Council's Landscape Consultant to dismiss the expert findings of [REDACTED]. We would ask Members reach their own view reading both experts Reports but raise a particular concern about how the Council's Landscape Consultant's view is predicated on the mistaken belief that the entire allocation forms part of St Ives (see 7.62 of Officer Report for an example).
39. This is simply not the case either on the ground or in policy terms. In policy terms Policy SI 1 made clear that it intended that the western part of the allocation (i.e Houghton Grange and the Application Site) form part of Houghton and Wyton village and the eastern part form part of St Ives. This is why the SI 1 made clear the built-up areas would form the "*the built-up areas of St Ives or Houghton and Wyton as appropriate*" and the Neighbourhood Plan considered Houghton Grange as part of the village.
40. This is then supported by the physical reality on the ground. Houghton Grange Phase 1 and the BBSRC Field historically formed part of the Houghton Grange estate and the topography and surroundings of BBSRC Field have more in common with Phase 1 than the Spires/St Ives.
41. The above is also why the Officer's response at 7.87 in relation to our density concern is misconceived. The Officer relies on using an edge of town density, but that fails to recognise that in policy terms and physically on the ground the Application is next to Phase 1 (with its 16 dph) and on the edge of a village (with 25 dph).

42. The Officer Report repeats the points raised above again in dealing with the Parish Council's concerns under 'Other Matters' (see for e.g., 7.341; 7.349; 7.378). We will not repeat our response which remains the same.
43. But at various points the Officer relies on the indicative illustration which is included with Policy SI 1 to argue it is broadly simply to the masterplan submitted with the Application. Our main response would be such a high-level broad plan cannot lend support especially when it was envisaged it would be followed by detailed master planning that never occurred. But even if reliance could be place, it would not support the Application. The Application does not align with it as housing has been placed along the road, and squeezed much more into the gap of open space. This is a result of Homes England over-developing the Site.
44. Overall, the Officer Report – in finding that the Application would accord with Policy SI 1 and overlooking the breach with the Neighbourhood Plan – has misinterpreted and misapplied policy in a manner which is unlawful.

#### *Conclusion*

45. The Parish Council is not against housing development at this allocated Site. But we are against the overdevelopment of the Site. The heart of the issue is that Homes England have taken an indicative numerical maximum and applied it as a threshold under which any level of housing would be acceptable. But that is simply not correct.
46. Policy SI 1 – read in the context of the introductory paragraphs of Chapter 9 – required a comprehensive master planned approach which spread housing across the wider allocation in a design-led approach. The fact this did not happen previously should not and cannot justify cramming the final part of this allocation with almost as much housing as the numerical maximum would allow by increasing the housing by a third from 88 to 120.
47. The ramification of such an approach is an Application which in its current form is contrary to Policy SI 1 generally, and also causes specific harm through the erosion of the separation between Houghton and Wyton and St Ives which is protected by SI 1 g and HWNP3 and through an out of character density which is far in excess of the adjoining Phase 1 development and village.
48. This is not a technical breach of policy – it causes real world planning issues and given the centrality of Policy SI 1, its' breach renders the Application contrary to the development plan as a whole. On that basis – regardless of the tilted balance – Members should refuse permission. The tilted balance doesn't justify development which is contrary to the development and the allocation policy which establishes the principle of development.
49. We would therefore ask Members to refuse permission. Our objections raise other matters which are also weighty but in this letter we wanted to focus our attention on the main issue especially given the unlawful way it is addressed in the Officer Report.

Yours faithfully



**RICHARD BUXTON SOLICITORS**