

DEVELOPMENT MANAGEMENT COMMITTEE 23rd FEBRUARY 2026

Case No: 25/01587/FUL

Proposal: Demolition and part demolition of factory buildings and phased erection of 82 dwellings, access works, landscaping and associated development.

Location: RGE Engineering and Bridge Place Car Park, The Avenue, Godmanchester.

Applicant: Markham and George Property Limited

Grid Ref: 524503 271386

Date of Registration: 1st October 2025

Parish: Huntingdon

RECOMMENDATION - APPROVE

This application is referred to the Development Management Committee (DMC) in accordance with the Scheme of Delegation as part of the site is within the ownership Huntingdonshire District Council.

1. DESCRIPTION OF SITE AND APPLICATION

Site and Surroundings

- 1.1 The application site measures approx. 2.3 hectares extending eastwards from The Avenue and comprises the former RGE Engineering site which is a large commercial building (the footprint of the main building excluding ancillary structures is approx. 7000m²) and which is located to the north of the site and the Huntingdonshire District Council operated car park known as Bridge Place to the east. Whilst located within the Godmanchester boundary, given its location at its entrance it is well-related to Huntingdon.
- 1.2 Visually, whilst the building is set back from The Avenue, the limited boundary treatments to the west affords clear views of the factory site and car park from The Avenue. West of the site is the Grade II Listed Riverside Mill whilst to north and south, Westside Common incorporating the path of the River Great Ouse and Cooks Backwater encloses the site. There is a relatively dense tree belt to the south which screens the A1307 flyover whilst to the north, the boundaries are sporadic, in poor repair, and, given the scale of the factory building and associated structures does little

to screen the built form. Thus, the commercial site (which given it is vacant has a dilapidated appearance) is a prominent and incongruous feature of the landscape.

- 1.3 The site lies outside of any Conservation Area (CA), but the boundary with the Huntingdon CA lies to the west (approx.30m) and the Godmanchester (Post Street) CA to the south (approx.30m). As above, the Grade II Listed Riverside Mill is to the immediate west of the site and the Grade I Listed bridge further west (approx.95m). There are trees subject to Preservation Orders within and adjacent to the site.
- 1.4 The site is predominantly located within Flood Zone 1 but there are some sections towards the northern, eastern and southern fringes which are within Flood Zones 2 and 3 as per the most recent Environment Agency (EA) Flood Risk Maps and Data and the 2024 Strategic Flood Risk Assessment (SFRA). The same data also shows some minor surface water flood risk centrally within the site. The site does not fall within a protected landscape but the Portholme Meadow Special Area of Conservation (SAC) is approx. 270m west of the site.
- 1.5 The site (albeit extending further to the south-west) is an allocated site within the Huntingdonshire Local Plan to 2036 (Policy HU14) allocated for the provision of approx. 90 homes and the re-provision of part of the site as a public car park.

Proposal

- 1.6 This application seeks full planning permission for the demolition and partial demolition of the factory buildings/structures and a phased development of 82 dwellings including access, landscaping and associated works. The description has been revised throughout the lifetime of the application to reflect the phasing element. Re-consultation, advertising and notification has been undertaken accordingly. A phasing plan highlighting the proposed stages of development has been provided and, in the event that permission is granted, conditions shall be worded to correspond with the phased development.
- 1.7 Vehicular, cycle and pedestrian access to the site would be via the existing access to Bridge Place Car Park from The Avenue. Pedestrian connectivity to the common land is provided to the north with further pedestrian access points joining The Avenue. Whilst not within the control of the applicants (due to land ownership), future provision has been made for a landing area for a footbridge to be provided to the south crossing Cooks Backwater.
- 1.8 The dwelling mix is proposed as four apartment blocks (2 x three storey and 2 x four storey), and a mixture of terrace, semi-detached and detached 2, 2.5 and 3 storey houses.

1.9 The proposal does not include any affordable housing due to viability issues which are discussed in the proceeding sections of this report.

1.10 This application has been accompanied by the following drawings and documents:

- Location plan & site plan
- Elevations, sections and floorplans
- Landscaping and lighting plans
- Design & Access Statement
- Accommodation Schedule
- Heritage Statement
- Flood Risk Assessment
- Site Survey, Layout and Flood Storage Losses and Gains
- Utilities Assessment and Level 2 Utility Study
- Energy Statement
- Noise Impact Assessment
- Asbestos Demolition Survey
- Transport Statement
- Ecological Impact Assessment
- Tree Survey and Arboricultural Impact Assessment
- Landscape and Visual Impact Assessment
- Biodiversity Net Gain Matrix

1.11 Officers have scrutinised the plans and have familiarised themselves with the site and surrounding area.

1.12 This is considered a reg 4 application as Huntingdonshire District Council own part of the land but the application is made by another party. Officers of the LPA have not been engaged with, or are privy to, any commercial matters relating disposal of council owned land. To ensure transparency the planning application has been advertised, and a site notice was erected as close as possible to the site, alongside wider consultation with stakeholders and residents. Further consultations have been undertaken during the course of the application. To ensure full transparency, this application is brought before the Development Management Committee for determination.

2. NATIONAL GUIDANCE

2.1 The National Planning Policy Framework (NPPF December 2024) sets out the three objectives - economic, social and environmental - of the planning system to contribute to the achievement of sustainable development. The NPPF 2024 at paragraph 10 provides as follows: 'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).'

2.2 The NPPF 2024 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;
- conserving and enhancing the natural, built and historic environment

2.3 The Planning (Listed Buildings and Conservation Areas) Act 1990, Planning Practice Guidance and the National Design Guide 2021 are also relevant and material considerations.

2.4 For full details visit the government website [National Guidance](#)

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
- LP7: Spatial Planning Areas
- LP10: The Countryside
- 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
- LP30: Biodiversity and Geodiversity
- LP31: Trees, Woodland, Hedges and Hedgerows
- LP34: Heritage Assets and their Settings
- LP36: Air Quality
- LP37: Ground Contamination and Groundwater Pollution
- HU14: RGE Engineering, Godmanchester (site allocation)

3.2 Godmanchester Neighbourhood Plan 2017-2036 (2017) Policies:

- GMC1 - The importance of the countryside setting
- GMC4 - Landscaping and planting to keep the semi-rural character of the Town
- GMC10 - Promoting Godmanchester's history and heritage

- GMC 11 – Ensuring development maintains and enhances the character of the Town and reflects its heritage and history
- GMC13 – Residential development
- GMC14 - For new residential development, plans should not exacerbate any pressure on 'on-street' parking and should provide numbers of off-street parking spaces appropriate to the site's location and the character of the proposal. The number of spaces should reflect the mix, size and type of housing
- GMC16 - Reducing Surface Water Flood Risk
- GMC 22 – Reducing traffic and congestion on Godmanchester's roads

3.3 Supplementary Planning Documents (SPD) and Guidance:

- Huntingdonshire Design Guide Supplementary Planning Document (2017)
- Developer Contributions SPD (2011)
- Huntingdonshire Landscape and Townscape SPD (2022)
- Huntingdonshire Strategic Flood Risk Assessment (2017)
- Cambridgeshire Flood and Water SPD (2024)
- Annual Monitoring Review regarding housing land supply (2024)
- Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021)
- Huntingdon Conservation Area Character Assessment (March 2007)
- Godmanchester (Post Street) Conservation Area Character Statement (October 2002)

Local policies are viewable at <https://www.huntingdonshire.gov.uk>

3.4 The National Design Guide (2021):

- C1 – Understand and relate well to the site, its local and wider context
- C2 – Value heritage, local history and culture
- I1 – respond to existing local character and identity
- I2 – Well-designed, high quality and attractive places and buildings
- I3 – Create character and identity
- B2 - Appropriate building types and forms
- M1 – A connected network of routes for all modes of transport
- M2 – Active travel
- M3 – Well considered parking, servicing and utilities infrastructure for all users
- N3 - Support rich and varied biodiversity
- P1 – Create well-located, high quality and attractive public spaces

- P2 - Provide well-designed spaces that are safe
- P3 - Make sure public spaces support social interaction
- U2 – A mix of home tenures, types and sizes
- U3 – Socially inclusive
- H1 – Healthy, comfortable and safe internal and external environment
- H2 – Well-related to external amenity and public spaces
- H3 – Attention to detail: storage, waste, servicing and utilities

For full details visit the government website.

4. RELEVANT PLANNING HISTORY

- 4.1 0701948FUL – Construction of car park (Approved)
- 4.2 25/00373/DEMDET – Application for prior approval to demolish redundant factory and ancillary buildings (Prior Approval Granted)
- 4.3 25/80347/COND – Discharge of Conditions 2 (Arboricultural Method Statement), 3 (Tree Protection Plan) and 4 (Demolition Method Statement) of 25/00373/DEMDET (Approved)

5. CONSULTATIONS

It should be noted that the comments summarised below relate to the most recent comments received (and so considered to be the most relevant) following re-consultation as a result of revised details being received or re-consultation on the revised description. Where no responses have been received to the re-consultation the original comments are considered to stand.

Summary of consultation responses

- 5.1 Godmanchester Town Council – Supportive of the principle of the redevelopment of the site but raise the following concerns:
 - Have strong reservations to the flat roof/parapet units.
 - Concerned about the adequacy of the flood risk and drainage arrangements – the TC refer to the Lead Local Flood Authority (LLFA) comments but this pre-dated revised detail and re-consultation. The LLFA have since removed their objection.
 - Wish to see a footbridge provided across Cooks Stream/Backwater.
 - Lack of commitment to environmental sustainability demonstrated. Renewable energy measures, external outlets (electric vehicles and so on).
 - Dislike the reliance on the desktop assessment to highways matters and consider that this does not account for future

changes in the locality and makes assumptions regarding historic traffic levels.

- Wish to see a condition imposed to prevent storage on balconies.
- Agrees with the concerns of Anglia Water and wishes to see these matters resolved before the application progresses.
- TC expects direct engagement and communication from HDC with the matters above addressed.

Officers have contacted Godmanchester Town Council directly with a response on the matters raised.

- 5.2 Huntingdon Town Council – No comments to make on re-consultation. Initially stated that they had no recommendation to make but noted comments from Godmanchester TC.
- 5.3 HDC Conservation Team – No objections, no adverse impact on heritage assets. Defer to Urban Design colleagues regarding frontage terrace design (HT9 on site plan).
- 5.4 HDC Landscapes Officer – No objections subject to conditions. Further details at section 7.74 onwards.
- 5.5 HDC Arboricultural Officer - No objections subject to conditions. Further details at section 7.72 onwards.
- 5.6 HDC Urban Design Team – No objections subject to conditions. Further details at section 7.26 onwards.
- 5.7 HDC Ecology Officer reviewing details and an update will be provided to Members.
- 5.8 HDC Planning Policy Team – No representations received at the time of determination.
- 5.9 HDC Economic Development Team - No representations received at the time of determination.
- 5.10 HDC Environmental Health Team – No objections subject to conditions relating to mechanical ventilation and contamination. Further details at section 7.42 onwards.
- 5.11 HDC Housing Policy Team – Consultation not continued due to viability issues.
- 5.12 HDC Operations (Waste) Team – No objections.
- 5.13 HDC Sports Development Officer – Recommend securing an off-site financial contribution via an S106.

Officer comments – There is a viability issue which will be discussed in the proceeding sections of this report and this particular matter at section 7.90.

- 5.14 CCC Highways Team – No objections subject to conditions, Further details at section 7.47 onwards.
- 5.15 CCC Transport Assessment Team – No objections subject to conditions. Further details at section 7.47 onwards.
- 5.16 CCC Historic Environment Team - No objections subject to conditions. Further details at section 7.34.
- 5.17 CCC Lead Local Flood Authority (LLFA) – No objections in principle – does not support dwellings in Flood Zone 3 but recognise that this is a planning decision. Further details at section 7.62 onwards.
- 5.18 CCC Street Lighting Team - No representations received at the time of determination.
- 5.19 Historic England – No comments to make, seek views of specialist conservation and archaeological advisers.
- 5.20 Environment Agency – No objections – for LPA to consider sequential test. Further details at section 7.59 onwards.
- 5.21 Health and Safety Executive – No representations received at the time of determination.
- 5.22 Cambridgeshire Fire and Rescue – No objection subject to a condition to secure fire hydrants. Further details at section 7.87.
- 5.23 Cambridgeshire Constabulary – No objections, provides advice on good practice and secured by design principles. Further details at section 7.88.
- 5.24 Anglian Water – Objection due to capacity issues. Further details at section 7.66 onwards.
- 5.25 Cadent – No objections in principle – informative note to be added to any permission.
- 5.26 Natural England – To be consulted following receipt of Screening Exercise – an update will be provided to Members following this.

6. REPRESENTATIONS

- 6.1 None received at the time of determination.

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 As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6)) and the Town and Country Planning Act 1990 (Section 70(2)) 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. This is reiterated within the NPPF (2024). 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 In Huntingdonshire the Development Plan (relevant to this application) consists of:

- Huntingdonshire's Local Plan to 2036 (2019)
- Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
- Godmanchester Neighbourhood Plan 2017-2036 (2017)

7.4 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.

7.5 The main issues to consider in the determination of this application are:

- The principle of development and affordable housing provision
- Impact on the character and appearance of the area & heritage assets
- Residential amenity
- Access, transport, highway safety & parking provision
- Flood risk, surface water and drainage
- Landscaping, Trees and Open Space
- Biodiversity
- Accessible housing
- Water efficiency
- Other matters
- Developer contributions

The principle of development, including affordable housing provision.

Housing Land Supply

7.6 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).

7.7 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 5-year housing land requirement, including a 5% buffer, is 5,907 homes. The current 5YHLS is 4,345 homes, equivalent to 3.68 years' supply.

7.8 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 titled 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 (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. Each planning application will be considered on its own merits and the degree of weight to be attached is a matter for the decision maker. Where an application is situated within a parish with a made Neighbourhood Plan NPPF paragraph 14 should also be taken into account.

Allocation requirements (Local Plan Policy HU14)

7.9 The application seeks full planning permission for the erection of 82 dwellings comprising apartment blocks, terraced, semi-detached and detached dwellings alongside associated parking, landscaping and infrastructure following demolition of the existing factory building and associated structures.

7.10 The site (albeit extending further to the south-west) is an allocated site within the Huntingdonshire Local Plan to 2036 (Policy HU14) allocated for the provision of approx. 90 homes and the re-

provision of part of the site as a public car park. The allocation states that successful development of the site will require:

- a. flood risk assessment considering all forms of flood risk and climate change with development sequentially located within the site and appropriate mitigation measures incorporated as necessary.
- b. an air quality assessment and low emissions strategy.
- c. a contamination assessment and mitigation measures as appropriate.
- d. provision of high quality development to reflect the site's sensitive location and relationship with several listed buildings and the Huntingdon and Godmanchester conservation areas, ensuring that heritage assets and their settings are preserved and where possible enhanced.
- e. provision of a cycle/ foot bridge across Cook's Stream to the dismantled railway line to link in with the wider pedestrian/ cycle network should be investigated and provided if possible.
- f. agreement with the Council in liaison with the Environment Agency and Anglian Water Services that waste water flows from the proposal can be accommodated.
- g. agreement with the Council in liaison with the Environment Agency that meeting the requirements of the Water Framework Directive would not be compromised.

Taking each point in turn:

7.11 Flood risk is addressed in greater detail at sections 7.53 onwards. However, for the purposes of this assessment, the site, given the allocation has already been deemed sequentially acceptable for residential development (with the allocation considering it acceptable for up to 90 homes). The application is accompanied by a detailed Flood Risk Assessment (FRA) and Addendum documents which set out the approach to flooding and the steps which have been taken to mitigate the risk for future occupants and those of surrounding land.

7.12 The A14 has been re-routed since the site was allocated and the application is accompanied by a document which details calculations of traffic generation and the implications on air quality and which concludes that compared with the current lawful use (factory and car park) that there will be a reduction in the number of vehicle movements associated with the site. Environmental Health Officers have been consulted and are satisfied with the assessment which has been conducted. They did query the impact that the current air quality may have on sensitive receptors (e.g.

the occupants of the site as it is within 50m of an Air Quality Management Area (AQMA) as defined under Policy LP36 of the Local Plan to 2036. Subsequently, a statement has been provided (dated 9th of December 2025) which sets out that there has been re-consideration of the approach to AQMA's and that the Huntingdon AQMA remains under review. Publicly available monitoring at the time of the statement advised that of the 334 days recorded in 2025 at no time were NO₂ (Nitrogen Dioxide) recorded as moderate or high and that PM₁₀ (Particulate Matter) or PM_{2.5} (Tiny Atmospheric Particulate Matter) were recorded as moderate for just one day. It further suggested that the re-routing of the A14 and post-covid levels needed to be considered. Environmental Health were re-consulted and raise no objection to this approach.

- 7.13 In terms of contamination, the application is accompanied by a Phase 1 Contamination Assessment and Phase 2 Geoenvironmental Assessment. These identify that (as anticipated given its historic uses) there are contamination issues associated with the site. HDC's Environmental Health Team have reviewed these documents and, whilst they raise no objections, they have recommended that the standard condition in relation to further exploratory works be attached to any permission. This limits any development beyond slab level and will ensure that any risks are mitigated. A separate Asbestos Survey has been provided, and the results of the assessment are that material scores are either low, very low or none. Recommendations are that where this does occur it is removed by trained operatives. This can be secured by condition. Furthermore, it should be noted that the site benefits from a prior approval to demolish the factory building and ancillary buildings (ref 25/00373/DEMDET). This has to be regarded as a material consideration as is a fallback position in the determination of this application.
- 7.14 Design and heritage is discussed in further details in at sections 7.26 onwards. However, it should be noted that the design and layout presented follow extensive pre-submission discussion with Officers including Urban Design, Conservation and Landscapes. There are no in principle objections from any of these specialists consultees and, for the purposes of this assessment it is considered that the development will represent a high-quality design in this sensitive and historical location.
- 7.15 It has not been possible to provide a cycle or footbridge across Cooks Stream and, due to a land ownership issue this is not something which is within the gift of the applicants to provide. However, provision has been made to the south of the site for a large 'landing area' to ensure that in the event circumstance alter in future that a footbridge may be provided. Whilst a connection would be desirable and it is unfortunate that this cannot be secured at this stage (and this is a matter which has been raised by Godmanchester Town Council) it is important to note that the

allocation states that the connection should be investigated and provided 'where possible'. Officers consider that this has been explored and that the provision of the landing area amounts to a willingness to provide this. In the planning balance and the provision of 82 homes and having regard to the wording of part e of HU14 this would not alone be a justifiable reason for refusal.

- 7.16 Waste water matters are addressed in detail at section 7.64 onwards. Anglian Water do maintain an objection meaning that a 'planning balance' decision must be taken.
- 7.17 Given the outstanding Anglian Water matters, growth plans for the waste-water treatment works and so the EA have been unable to comment aside from stating that the LPA should be satisfied that the growth can be accommodated without harm to the water environment. This is discussed in further detail at section 7.64 onwards.
- 7.18 The allocation refers to the re-provision of the car park (though it does not state that this is a specific requirement to allow for the re-development of the site).
- 7.19 A car park for land south of Bridge Place received planning permission on the 22nd of May 2019 under reference number 18/02381/FUL. This is referenced within the submitted Design and Access Statement which also suggest that the Council no longer intends to provide this. There were a number of conditions imposed on 18/02381/FUL which do not appear to have been discharged. As such, this planning permission is considered to have lapsed and can no longer be implemented.
- 7.20 Officers have attempted to seek clarity on the lack of re-provision of the car park and have been advised that Parking Services were asked to provide an analysis of car parking use was exceptionally minimal and easily absorbed within existing capacity based on the work being completed at that time to establish a parking strategy. There does not appear to be a formal record of this decision, however, Officers consider that it is reasonable to consider that with the obvious reduction in demand due to changes to behaviours since the Covid-19 Pandemic, home working, increased online shopping and banking etc. Other available parking within a reasonable distance to the site and HDC assuming responsibility for on street parking enforcement (thus freeing up spaces in the town centre for shoppers etc) that the re-provision is not required and is not likely to be something the Council seeks to pursue. Furthermore, advertising (neighbour notification, a site notice and press notice) has not generated any comments.

Affordable housing provision

7.21 Policy LP24 of the Local Plan seeks to secure affordable housing provision stating that a proposal will be supported where:

- It delivers a target of 40% affordable housing on a site where 11 homes or 1,001m² residential floorspace (gross internal area) or more are proposed;
- it provides approximately 70% of the new affordable housing units as social or affordable rented properties with the balance made up of other affordable tenures;
- affordable housing is dispersed across the development in small clusters of dwellings; and
- it ensures that the appearance of affordable housing units is externally indistinguishable from that of open market housing.

7.22 The Policy goes on to state that where it can be demonstrated that the target is not viable due to specific site conditions or other material considerations affecting development of the site an alternative dwelling or tenure mix or a lower level of provision may be supported preference will be given to amending the tenure mix; only if this is still demonstrated not to be viable will consideration be given to reducing the affordable housing requirement. A development viability assessment may be required to support an alternative mix or level of affordable housing provision.

7.23 Within the supporting text of LP24 Section 7.11 specifically states that "Where a developer can demonstrate that delivery of 40% affordable housing within a site is not viable with the dwelling and tenure mix set out in the policy the Council will negotiate to reach a viable solution to enable development to proceed. A developer may be required to provide a formal 'open book' viability assessment to support a change in tenure or a lower level of provision. Where this is required the developer will also be required to meet the costs of the Council's verification of this. In some exceptional cases it may be appropriate to accept an off-site contribution towards the delivery of affordable housing on alternative sites."

7.24 In this case, no affordable housing provision is provided. A viability assessment accompanies the application and the Council has engaged independent assessors to review this. The applicant has covered the cost of these further assessments and these conclude that the development is not viable to provide affordable housing or any financial contributions.

7.25 Overall, having regard to the above assessment in consideration of the allocation requirements of HU14 and the approach to affordable housing provision, the development is considered to

be acceptable in principle subject to compliance with other material planning considerations and conditions.

Impact on the character and appearance of the area & heritage assets

7.26 Whilst located within the Godmanchester boundary the site lies within the Huntingdon Spatial Planning Area as defined under Policy LP7 of the Local Plan to 2036. LP7 states that “a proposal for housing development (class C3) or for a residential institution use will be supported where it is appropriately located within a built-up area (BUA) of an identified Spatial Planning Area settlement.” In this case the site is located within the BUA and has been allocated for development. Design principles fall to be considered under Local Plan Policies LP11 and LP12 which state (amongst other matters) that:

“A proposal will be supported where it is demonstrated that it responds positively to its context and has drawn inspiration from the key characteristics of its surroundings, including natural, historic and built environment, to help create distinctive, high quality and well-designed places.” And “New development and advertisements will be expected to be well designed based upon a thorough understanding of constraints and appraisal of the site's context, delivering attractive, usable and long lasting buildings and spaces.”

These align with the aims of Godmanchester Neighbourhood Plan Policies GMC4, GMC10, GMC 11 and GMC 13 which state (amongst other matters) that “all new development should demonstrate a high quality of landscaping and planting that is in keeping with the surrounding area and which replicates and extends the semi-rural character of the Town.” And “residential development within or adjoining the settlement boundary of Godmanchester should reflect the character of the surrounding area and protect amenity of neighbours.”

7.27 The character of the site has been referenced in the preceding sections of this report, and, as alluded to, the design submitted follows extensive consultation with Officers (including urban design and heritage specialists). The existing factory building and associated ancillary structures and features are highly visible from The Avenue and especially from West Side Common. It has a derelict appearance, has been subject to vandalism and the limited, sporadic and damaged boundary treatments do little to obscure this alien feature in the setting of the common land and historic mill building to the west.

7.28 The layout provides outward facing development (taking advantage of the surrounding views). A loop movement is provided for ease of access for vehicles, cyclists and pedestrians as well as access to the common land. The block of development

ensure that there are gaps in the built form allowing views of the wider landscape. The proposal relates to the provision of 82 dwellings and associated landscaping and parking. These consist of two 3 storey apartment blocks A (at the southwestern corner adjacent to the access) and B (to the east and south-facing), two 4 storey apartment blocks (C & D) located to the north-western corner and a terrace on the western boundary facing The Avenue. Aside from these, the remainder of the development on the northern and eastern boundaries are 3 storey detached dwellings. Remaining dwellings are a mixture of 2 and 2.5 storey semi-detached and terraced dwellings located centrally to the loop road with a main central tree lined street leading south-north facing the northern access with the meadow land. Parking is either on plot (including garages/car barns), to the front of the dwellings or, remote parking. Cycle and wheeled bin storage has been an integral part of the design. Matters relating to materials, architectural details, cycle storage and levels shall be secured by condition. It is also considered prudent to limit permitted development rights for certain dwellings to ensure adequate amenity space is retained and sensitive areas of the site is protected. No specific details of renewable energy methods such as Solar PV panels have been provided. Whilst the concerns of the Town Council are noted, HDC does not have a specific Policy in place to mandate these. New development is however subject to building regulation requirements and so a condition to secure details of any required measures will also be imposed in the event that Members approve the application.

- 7.29 In terms of outside space, all of the houses benefit from some private amenity space whether this be garden, courtyard or terrace. Whilst the scale of some of this space is limited, Officers have given regard to the sustainable location and the ease of access to the surrounding common land (including the additional connectivity provided as part of the scheme). As such, the provision is considered to be acceptable. HDC's Landscaping Officer has been involved from the design stages and has provided guidance on level of green space, boundary treatments, layout and so on, this is discussed in further detail at section 7.72 onwards. Officers note that the Town Council request that a condition be added to any permission to limit storage on the balconies. The applicant has indicated that they would be prepared to consider a covenant in this respect and this is a matter for them to consider. The LPA would not be in a position to impose a planning condition as this would not meet the six tests required of a planning condition and could leave the LPA (in the event of approval) at risk of appeal. In regard to overall visual impact of the proposed development, both Urban Design and Landscape Officer are content.
- 7.30 As detailed in the preceding sections of this report, whilst not within a designated CA the site is within the setting of the Huntingdon and Godmanchester (Post Street) CA's. Furthermore,

the site is also in the setting of Grade II and Grade I Listed Structures (Riverside Mill and the Bridge). Having regard to this, the following legislation is considered:

- Section 72 of the Planning (LBCA) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- Section 66 of the Planning (LBCA) Act 1990 states that 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.
- Para. 212 of the NPPF sets out that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (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'.
- Para. 213 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'

Local Plan policy LP34 aligns with the statutory provisions and NPPF advice.

7.31 As with other matters, HDC's Conservation Team have been involved from the early stages of the project, and the applicants have been receptive to design features suggested by Conservation Officers. The application is accompanied by a detailed Heritage Statement which considers the site history, the approach to the scheme and the impact on surrounding heritage assets. HDC's Conservation Team have been consulted on the submitted plans as have Historic England. The latter had no comments to make and suggested that views of specialist advisers (Conservation) was sought.

7.32 Following a review of the submitted details, Conservation Officers raise no objections observing that the proposed scheme responds to feedback which was provided at the pre-application stages. They note that the scale of buildings have been arranged to acknowledge and balance Riverside Mill and to present a coherent frontage to Bridge Place and view from Huntingdon Bridge. Having regard to the design and layout they consider that

the overall visual impact will be softened by the existing trees and proposed planting within the landscaping scheme. Of particular note is the fact that the development should have no more visual impact than the existing factory building.

7.33 Special regard has been given to the design of apartment block A and the frontage terrace which will be the 'public face' of the development. Conservation Officers did note that whilst (under the original design) apartment block A would serve as a suitable counterweight to Riverside Mill the terrace risked failing to integrate with the 'less formal' appearance of some of the historic buildings and the industrial character of the mill. Whilst no formal objections were raised by Conservation Officers they did defer this consideration to Urban Design and these matters have been rectified under the amended plans. Conditions as detailed in the preceding sections of this report (materials, architectural details etc) will allow the LPA to retain control of the development and secure a high-quality finish.

7.34 Cambridgeshire County Council's Historic Environment Team (Archaeology) have been consulted. They note that the site does have some archaeological potential and as such, whilst they do not object to the principle of development, further investigation is needed prior to the commencement of any works. This can be suitably managed by condition.

7.35 Overall, the development is considered to be acceptable with regard to its visual impact, design, and impact on the designated heritage assets and accords with Policies LP2, LP11, LP12 and LP34 of the Huntingdonshire Local Plan to 2036, Policies GMC1, GMC4, GMC10, GMC13 and GMC 11 of the Godmanchester Neighbourhood Plan 2017-2036 (2017), the Town and Country Planning (Listed Buildings and Conservation Act) 1990 and the provisions of the NPPF (2024).

Residential Amenity

7.36 Policy LP14 of the Local Plan to 2036 states a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the proposed development and maintained for users and occupiers of neighbouring land and buildings.

Amenity of neighbouring properties

7.37 The closest neighbouring residential properties are to the west within the Riverside Mill building which is now apartments. The apartment block D (a four storey block) and the front terrace (HT9) are the closest units to the mill building. The buildings are orientated such that they not directly adjacent and there is approx. 35m between them (the apartments and the terrace) at the closest point. It is not considered that there will be any negative impacts in terms of overbearing impact, overshadowing or loss of light

given this layout. The dwellings to the south of The Avenue have a greater degree of separation and again will not be impacted. Given the degree of separation, arrangement of windows and defensible space there will also be no impact in terms of overlooking or loss of privacy.

Amenity for future occupiers

7.38 As referenced in the preceding sections of this report, the dwellings all benefit from some outside amenity space. In terms of the houses this is either private garden area, courtyard or terraces. The apartments all benefit from balconies which accord with the Huntingdonshire Design Guide in terms of their scale. Again, given the sustainable location and ease of access to facilities for leisure, recreation and green space the level of provision is considered to be sufficient. Huntingdonshire District Council has no policies in place to mandate the scale of amenity space and so consideration is always in terms of residential amenity.

7.39 In terms of internal space, it has been confirmed that all of the dwellings are M4(2) compliant (accessible and adaptable) and comply with space standards. It is not possible to achieve full compliance (when parking is considered). However, the majority do comply and Policy LP25 does offer some flexibility that the requirement need only be met unless it can be demonstrated that site-specific factors make achieving it impractical or unviable. As set out in the preceding sections of this report, there are confirmed viability issues and so reducing units or amending layouts was not an option. Officers are satisfied that having regard to the planning balance, the benefits of providing 82 dwellings and redeveloping this allocated site outweighs any minor harm caused by this.

7.40 In terms of overshadowing and loss of light, Officers have given very careful consideration to the dwellings which would be adjacent to the apartment blocks, namely Plots 10, 25, 43, 57 & 68. None of these have primary windows adjacent to the massing of the apartment blocks. Given the scale and arrangement of dwellings and amenity space there will be no significantly detrimental impacts on the dwellings or associated amenity space.

7.41 In terms of overlooking and loss of privacy, again, the layout and placement of windows has been carefully arranged to avoid any overlooking as much as possible. For the most part, back-to-back separation of the recommended 21 metres is achieved. An exception is dwellings 18-23 and their relationship with 28-31 where the separation is approx. 19.6 metres. Distances to common boundaries are between 9 and 10 metres. Whilst increased separation is preferable, this is not always achievable. Given the viability issues reducing the number of units to achieve greater separation is not an option. It must also be recognised that some minor overlooking cannot be avoided. What is important is to balance the degree of harm against the merits of the scheme.

In this case, the reduced separation is minimal in practice and would not result in significant harm to any existing occupants (and so it would not reduce the degree of amenity currently enjoyed). On balance, providing 82 dwelling on an allocated site far outweighs the harm caused by this minor reduced separation and can be accepted in this instance. Where necessary, a condition shall be added to secure obscure glazing to any secondary windows or non-habitable rooms to reduce overlooking impacts.

7.42 As set out at sections 7.12 and 7.13, Environmental Health (EH) Officers have been consulted and are satisfied with the approach which has been taken to air quality management/pollution and require no further surveys in this respect. The application is accompanied by a Noise Impact Assessment. Whilst EH have not formally objected they have raised some concerns regarding the impact of noise on external areas of some of the units (balconies on blocks A & B are of most concern). EH acknowledges that it will be challenging to mitigate these issues without fully enclosing the balconies which is not a suitable solution. Again, Officers have carefully considered this impact against the planning balance and consider that given the easy accessibility to recreation space set away from the road the harm would not be significant such to justify a refusal or ask for further assessments on these issues. EH also recognises that the internal noise levels comply with recognised guidelines with windows closed but that this may exceed acceptable levels if windows were opened. Naturally this is a choice for the residents of these units, however, Officers recognise that an alternative approach will need to be explored in order to provide options. Mechanical ventilation will therefore be required on some units in order to allow for the residents to have options. EH have observed that wall vents are intended but that some further detail will be needed on these in order to ensure that these do not cause exceedance of acceptable noise levels. These matters can be secured by condition in the event that Members approve the application.

7.43 Overall, having regard to the above, and subject to conditions, the proposed development is considered to be acceptable in terms amenity to both existing neighbouring properties and future occupants of the proposed development in accordance with Local Plan Policy LP14, the Huntingdonshire Design Guide SPD, Policy GMC13 of the Godmanchester Neighbourhood Plan 2017-2036 (2017) and Section 12 of the NPPF (2024).

Access, Transport, Highway Safety & Parking Provision

Access, Transport & Highway Safety

7.44 Policies LP16 and LP17 of the Local Plan to 2036 seek to ensure that new development incorporates appropriate space for vehicle movements, facilitates access for emergency vehicles and service

vehicles and incorporates adequate parking for vehicles and cycles.

7.45 Paragraph 116 of the NPPF states: 116. Development should only be prevented or refused on highways 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 reasonable future scenarios.

7.46 The main vehicular, pedestrian and cyclist access for the site is off The Avenue utilising the existing access for the car park which has 257 parking spaces. Pedestrian access to the common land is also provided to the north as well as at additional points from The Avenue.

7.47 The application is accompanied by a Transport Statement and Transport Statement Addendum and CCC's Highways and Transport Assessment Team have been consulted. Whilst it is noted that Godmanchester Town Council have raised concerns about the 'desktop' assessment which has been provided it must be acknowledged that this is previously developed land allocated for development within the local plan. Vehicle movements associated with the existing uses – the car park which remains in operation at the time of writing and the factory which, whilst vacant still benefits from its approved use and so could be brought back into service must also be given weight. Specialists have also requested further clarity on the details submitted which, as set out below has been provided with specialists re-consulted throughout the lifetime of the application.

7.48 The proposals make provision for 1 space per 1-bed apartment, 1.5 spaces per 2-bed apartment, and 2 spaces each for the 2, 3 and 4-bed houses as well as 17 visitor spaces. In addition, further communal spaces are provided relative to the apartment blocks. These are either on plot (including garages/car barns), to the front of the dwellings or, remote parking (but still convenient to the dwellings which they serve). Space for cycle storage (1 space per bedroom) is also provided for each unit and shall be secured by condition along with the delineation of parking spaces in the event that Members approve the application. HDC have no specific Policy in place to require a specific level of parking be attributed to a scheme. In this case, given the level of provision intended alongside the sustainable location this is considered to be acceptable. It is not intended that the site will be adopted by CCC Highways and will therefore remain private.

7.49 CCC Highways initially requested that the existing signalised pedestrian crossing to the north of the access which links the footway to the east of The Avenue to the shared footway/cycleway to the west of The Avenue would need to be upgraded to a Toucan crossing and the footway would need to be widened and upgraded (to become a shared footway/cycleway). The Traffic Statement

Addendum covers these matters and suggests that a financial contribution shall be secured for these works. CCC Highways have been re-consulted and note that financial contribution may prove unviable (and, as noted in the preceding sections of this report there are viability issues to consider). Therefore, they require this matter to be dealt with by condition. Officers consider that this is an acceptable solution and will be imposed (alongside other conditions) in the event that Members approve the application. CCC Highways have no objections subject to condition.

7.50 CCC Transport Assessment Team initially raised no in principle objections but requested further clarity/updated data on some matters. This was provided in the Traffic Statement Addendum and they were re-consulted. Following a review of the revised details the Transport Assessment Team raise no objections. They recommend that a condition is added that 'Welcome Travel Packs' be provided to the occupants of the dwellings prior to their first occupation. This is considered to be a reasonable request and typical of development of this scale and nature.

7.51 Cambridgeshire Fire and Rescue and HDC Operation (Waste) Team, have been consulted and raise no objections in terms of accessibility and manoeuvrability. Cambs Fire recommend the inclusion of hydrants and this is discussed later in this report.

7.52 Overall, having regard to the above assessment and advice of specialists (as set out above), whilst the concerns raised by the Town Council are noted, the development is considered to be acceptable with regard to access, highway safety, parking provision and sustainable travel and therefore accords with Policies LP16 and LP17 of the Local Plan to 2036, Policies GMC14 and GMC22 of the Godmanchester Neighbourhood Plan 2017-2036 (2017) and the NPPF (2024).

Flood Risk, Surface Water and Foul Drainage

Flood Risk & Surface Water

7.53 National guidance and Policy LP5 of the Local Plan to 2036 seek to steer new developments to areas at lowest risk of flooding and advises this should be done through application of the Sequential Test, and if appropriate the Exceptions Test (as set out in paragraphs 170-179 of the NPPF 2024).

7.54 The site is largely located within Flood Zone 1 with some sections to the north, east and south in Flood Zones 2 and 3. There is also some minor surface water flood risk located centrally on the site. The 2024 Strategic Flood Risk Assessment (SFRA) classifies the Flood Zone as 2, 3a and future 3b.

7.55 Paragraph: 027 Reference ID: 7-027-20220825 of Planning Practice Guidance outlines that: In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied. It is important to note that in this case the site is an allocated site for residential development under Policy HU14 of the Local Plan to 2036 and as such has been deemed sequentially acceptable for the development proposed. It therefore remains for it to be demonstrated that the exception test is passed demonstrating that the development will be safe for its lifetime.

7.56 A Flood Risk Assessment (FRA) and Drainage Plan has been submitted with this application and the Environment Agency have been consulted. The submitted FRA (and associated appendices) identifies those units (and amenity land) which fall within the Flood Zones. These are all to the north of the site. Even in these instances the frontage/access points to the buildings are within Flood Zone 1 and so escape routes in the event of a flood emergency are retained within Flood Zone 1.

7.57 Calculations have been provided showing the level of flood risk and the maximum loss of flood storage capacity which would result from the development along with the level of actual risk. Again, it must be regarded that this is previously developed land on which a large factory building stands along with a number of large ancillary structures. The majority of the site (as well as the car park) is hard surfaced and therefore lacks permeability or sustainable drainage methods.

7.58 Section 4.6 of the SFRA details the approach to ensure flood resilient construction and this shall be secured by condition in the event that Members approve the application.

7.59 The Environment Agency have reviewed the submitted details and originally raised an objection as they considered that the original FRA did not sufficiently demonstrate that a sequential approach had been adopted nor that adequate flood storage compensation would be provided to ensure that there would be no increase in flood risk elsewhere. Following receipt of these comments, an update was provided by MTC Engineering dated 8th of December 2025. The EA have been re-consulted, and, based upon the technical detail within the FRA remove their objection.

7.60 The EA maintain their concerns regarding the properties on the northern boundary because they will be in an area of high flood risk. However, the EA have confirmed that these properties won't

be in the functional floodplain. Notwithstanding this, there may be some water up to their back of the patios and flooding of public gardens/amenity space in 1 in 50 year flood event, meaning that land has a 2% chance of flooding within any given year. Whilst this is not preferable, the dwellings have been designed to ensure any flood risk is limited to outdoor amenity areas. In addition to this, a number of mitigation measures are included such as finished floor levels being above a certain height. The EA are also satisfied with the proposed mitigation measures which can be secured by condition. Permitted Development Rights for built form (extensions, outbuildings etc) are recommended to be removed for these northern properties to ensure the LPA retains control over this land that is at risk from flooding.

- 7.61 In terms of the site being allocated, a sequential test would have been carried out in order to allocate the site for development. This would have examined by an Inspector as part of the process to adopt the Local Plan. It is therefore considered that a sequential test is not required again. The allocation (Policy HU14 part a) also requires a flood risk assessment considering all forms of flood risk and climate change with development sequentially located within the site and appropriate mitigation measures incorporated as necessary. It is considered that the applicant has undertaken all the necessary work to demonstrate that the above has been satisfied whilst balancing the site constraints.
- 7.62 In terms of surface water, Cambridgeshire County Council as the Lead Local Flood Authority (LLFA) have been consulted. Initially the LLFA objected due to the level of development proposed within Flood Zone 3 as well as technical matters related to the outfall and discharge rates. Following these comments MTC Engineering provided a response dated 5th December 2025 and the LLFA have been re-consulted. Following a review of the revised details they have removed their objection. In technical terms they consider the development acceptable and suggest conditions to be imposed. These can be added to any permission in the event that Members approve the application.
- 7.63 Anglian Water in their comments dated 23rd of December 2025 object to the scheme in terms of surface water disposal noting that the detail submitted does not make it clear how surface water will be managed and states that there is no public surface water sewers in the vicinity of the site and that surface water must not connect to a designated foul public sewer. Officers consider that this is a matter which is generally addressed at the building regulations stages. However, notwithstanding this consideration, as set out in the response to the comments provided by the applicant dated 20th of January 2026 it is not intended that any surface water enters the public foul network and the design would be in accordance with LLFA requirements. Moreover, they do refer to the current arrangement and approved use of the site. Overall, the re-development of the site is likely to result in an enhancement

of the existing and historic measures of surface water disposal and result in a betterment to the existing situation.

7.64 Overall, whilst the concerns of the Town Council have been considered and the LPA make the final decision on such matters this is with reliance on advice from technical consultees. In this case, as set out above, both the EA and LLFA have removed their objections (aside from the sequential element). Officers do acknowledge that the comments from the Town Council were made without the benefit of the revised consultee comments set out above.

7.65 Subject to the conditions suggested by the consultees and securing the mitigation measures, the proposal would be acceptable with regard to its impact on both flood risk and surface water and would not result in flooding on the site or elsewhere. The proposal therefore accords with Policies LP5, LP6 and LP15 of Huntingdonshire's Local Plan to 2036, Policy GMC16 of the Godmanchester Neighbourhood Plan 2017-2036 (2017) and Section 14 of the National Planning Policy Framework in this regard.

Foul Drainage

7.66 Anglian Water have confirmed that the site is located within the catchment area of the Huntingdon (Godmanchester) Water Recycling Centre (WRC) and this lacks capacity to accommodate the flows generated by the proposed development. Therefore, they consider that the site is unsustainable due to the associated environmental risk and the increased discharge rates. They do acknowledge that the used water network (which excludes the WRC) has capacity to accommodate the flows.

7.67 Officers are aware that Anglian Water were consulted on allocations within the Local Plan and that (albeit in 2019) a pre-application enquiry (provided within the FRA Addendum Part 2) confirmed that the WRC could accommodate flows. Anglian Water have advised that pre-planning enquiries have a validity period of 12 months and that they cannot reserve capacity within the network for sites which lack planning consent (such as those allocated in the Local Plan).

7.68 Officers have given very careful consideration to the above matters. It is understood that there is a funding issue associated with upgrade of WRC's in a number of locations but that this is not a planning issue but an issue for Anglian Water to address. Whilst the comments from Anglian Water and the Town Council are not disregarded it remains that a decision must be reached on this scheme and therefore a 'planning balance' approach must be taken.

7.69 In this case, the site is allocated and will provide 82 dwellings which is 8 less than the allocation. The site is wholly brownfield land which consists of a lawful factory use and a car park. The factory (although vacant) has an approved use in place and could be brought back into service at any time or replaced with a similar use. The agent has confirmed that the factory employed over 150 staff and operated 24/7 365 days a year. It should be noted that the factory had no restrictions on it regarding use of water or drainage, predates modern construction methods which seeks to reduce the amount of water developments use. Naturally a degree of foul waste was generated by the staff as well as wastewater generated from the operational processes in terms of cooling and heating. Were the factory to resume operations then this would all result in discharge (at these rates) and potentially increased rates depending on the type of factory to the Godmanchester WRC.

7.70 Whilst it cannot be guaranteed of the level of occupancy of the new development (e.g. if it would be fully occupied during the day thus producing more flows), the applicant has commissioned an assessment of the likely waste flows compared between the lawful use and the proposed development. Whist this of course is only an estimate, even with some degree of tolerance there is a clear difference between the current flows from the lawful factory use and the proposed flows from the development. It is considered that complete flows from the lawful use amounted to approx. 114.38m³ per day (a mixture of domestic (staff) and trade effluent) whereas the flows from the proposed development would be approx. 33.66m³ per day. The development has been designed to ensure that no surface water enters the public foul network which will represent enhancement of the existing and historic measures of surface water disposal and result in a betterment to the existing situation.

7.71 This objection from Anglian Water will need to be weighed against the benefits of the redevelopment of a brownfield allocated site with a lawful factory use which will be set out at the end of the report with the planning balance.

Landscape, Trees and Open Space

Trees

7.72 Policy LP31 of the Huntingdonshire Local Plan to 2036 requires proposals to demonstrate that the potential for adverse impacts on trees, woodland, hedges and hedgerows has been investigated and that a proposal will only be supported where it seeks to conserve and enhance any existing tree, woodland, hedge or hedgerow of value that would be affected by the proposed development. Some trees within and adjacent to the site are protected by a Tree Preservation Order.

7.73 This application is accompanied by a Tree Survey and Arboricultural Impact Assessment. The proposal involves the removal of all trees from the centre of the development, whilst retaining the important trees (bounding Cooks Backwater and the common land) to the south of the site. Most of the mature trees are to be removed along the northern boundary of the site. A large number of trees are to be removed but most of these are in poor condition with limited life expectancy. HDC's Arboricultural Officer has been consulted and raises no objections to the proposed scheme. The Tree Officer notes that there are some incursions into the roots of some trees but that these are small enough not to significantly impact their health. It is also noted that there may be some pressure for future pruning of tree canopies where these overhang parking areas etc, but this is not a reason to justify a refusal of the application. Overall, subject to conditions to secure replacement planting (as set out below) the development is considered to be acceptable with regard to its impact on trees and therefore accords with Policy LP31 of the Local Plan to 2036.

Landscaping

7.74 The application is accompanied by full landscaping details including a masterplan, landscaping specifications and so on. HDC's Landscaping Officer has been involved from the pre-planning stages and had recommended amendments to the original submission. These details have been provided and, following re-consultation he raises no objections to the scheme.

7.75 All of the above matters shall be secured by condition. It is also considered prudent to impose a condition on any consent limiting permitted development rights for boundary treatments for the more sensitive plots (facing on to the common land for example).

Open space

7.76 The scheme provides a number of areas of open space within it including a Local Area for Play (LAP) to the south of the site. Whilst in general terms Officers would seek to achieve additional green space or off-site contribution via a S106, given the previously referred to viability issues this is not a matter which has been pursued. Officers are of the view that an 'on balance' decision can be taken in this instance given the sustainable location and easy access to surrounding public amenity space, particularly given that the proposals include access points to this land.

7.77 Overall, subject to conditions it is considered that the development will accord with Policies LP12, LP13 and LP31 of the Huntingdonshire Local Plan to 2036 and Policy GMC4 Godmanchester Neighbourhood Plan 2017-2036 (2017).

Biodiversity

7.78 Paragraph 187 of the NPPF (2024) states Planning policies and decisions should contribute to and enhance the natural and local environment. Policy LP30 of the Local Plan to 2036 requires proposals to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated and ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type, and location of development.

7.79 The application is accompanied by an Ecological Impact Assessment prepared by ELMAW Consulting as well as a Biodiversity Net Gain (BNG) Metric. The former is a revised document dated November 2025 which details the findings of the additional surveys required for bats, reptiles, water voles and otters. These details are being reviewed by HDC's Ecology Officer and an update will be provided to Members.

7.80 It is noted that the site lies within the vicinity (though not immediate) of Portholme Meadow (approx. 270m west of the application site). Portholme is a Special Area of Conservation (SAC) and also a Site of Special Scientific Interest (SSSI). Given the relationship between the two, the site falls within the impact risk zone of the SAC and so a Stage 1 Screening Exercise is required to determine if a further 'appropriate assessment' under the Habitats Regulations Assessment (HRA) is required. At the time of writing the report the Screening Exercise outcome was not available, and Officers are required to consult Natural England on this matter. In the event that Members approve the application Officers request that delegated powers for approval are granted subject to any further works/surveys identified within the Screening Exercise and the resolution of any requirements identified by Natural England (where applicable). In the scenario where Natural England request a S106 contribution to help mitigate footfall for the SSSI, given the above commentary on viability, a financial contribution could not be secured in this instance.

7.81 In accordance with Schedule 7A of the Town and Country Planning Act 1990, as inserted by the Environment Act 2021 and amended by the Levelling Up and Regeneration Act 2023, this development is subject to the mandatory requirement to deliver at least a 10% Biodiversity Net Gain (BNG).

7.82 BNG details have been provided and reviewed by HDC's Ecology Officer. The site in its present form is relatively low value given the degree of hard surfacing and operations taking place within it. It is noted that the surroundings are valuable due to it consisting of meadowland and water courses etc which have connections to other habitat sites of importance. Officers note that some works in close proximity of the river will be unavoidable given that the eastern corner of the factory building is almost directly adjacent

and within the riverbank. However, the site does benefit from a separate consent to demolish the factory and ancillary buildings (ref 25/00373/DEMDET). This was issued on the 2nd of April 2025, and the applicant has five years from this date to complete the works. The decision included three conditions which needed to be dealt with prior to commencement, and these have been successfully discharged under application reference 25/80347/COND. This is therefore a realistic fallback position which is a material consideration, and must be given weight in the determination of this application. The proposed development has been designed to ensure all built form is set back by 10m from the riverbank. For these reasons, it is considered that a river condition assessment is not required in this instance.

- 7.83 In regard to BNG, in principle this is acceptable give the sites low ecological value due to the factory and car park. HDC's Ecology Officer is finalising the review of BNG details, and an update will be provided to Members.
- 7.84 Subject to confirmation from the Ecology Officer and Natural England, and the imposition of any recommended conditions, the proposal is considered to broadly accord with the objectives of Policy LP30 of Huntingdonshire's Local Plan to 2036 and Section 15 of the National Planning Policy Framework in this regard.

Accessible Housing

- 7.85 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 (where practicable and viable) 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. In this case the applicant has confirmed that all of the dwellings are designed to be M4(2) compliant (internally) but given the site constraints it has not been possible to design all of the parking to be M4(2) compliant (though in the most part this has been achieved). None of the dwellings will be M4(3) compliant but the Policy does not require this as the development does not constitute 'large scale development'. The Policy does afford some flexibility in that it states that the requirement is there unless site-specific factors make it impractical or unviable. In this case, given the site constraints (viability issues), reducing the number of units solely to achieve the compliance is not an option. Officers therefore consider that on balance, this provision is acceptable in this instance.

Water Efficiency

7.86 The requirements within policy LP12 of Huntingdonshire's Local Plan to 2036 relating to sustainable design and construction methods are applicable to all new dwellings. A condition is recommended to be attached to ensure that the dwellings are built in compliance.

Other Matters

Fire Hydrants

7.87 Cambridgeshire Fire and Rescue have been consulted on the application and raise no objections in terms of accessibility etc. They do recommend that a condition is imposed on any permission to secure the provision of fire hydrants. Officers consider this to be reasonable and it shall be imposed in the event that Members approve the application.

Designing out Crime

7.88 Cambridgeshire Constabulary have been consulted and advise that in general, the proposed layouts are acceptable and provide reasonable levels of surveillance of adjacent dwellings. Parking (also with adequate surveillance) and pedestrian safety have also been considered. Many of these matters are good design principles and will be a theme of the considerations of Urban Design Officers. The comments make recommendations for security enhancements such as locations of rainwater goods (preventing access to windows and balconies etc) and suitable locks, gated access and so on. Whilst it is not considered necessary or reasonable to condition such matters and informative note can be added to any permission.

7.89 Cadent Utilities have been consulted. They raise no objection in principle but as there is utility infrastructure in the vicinity of the site an informative note shall be added to any permission which highlights necessary searches.

Developer Contributions

7.90 HDC's Sports Development Officer has been consulted and recommends securing an off-site financial contribution for sports provision. The figure calculated is £49,474.29. Whilst Officers acknowledge the benefits of securing such a contribution, in this case, given the viability issues set out in the preceding sections of this report, it is not considered that such contribution can be achieved.

7.91 A signed wheeled bin unilateral undertaking form will be provided in accordance with Policy LP4 of Huntingdonshire's Local Plan to 2036.

Conclusion and Planning Balance

7.92 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

7.93 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). 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.

7.94 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 titled balance'.

7.95 NPPF para 11 states:

'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 Foot note 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.'

- 7.96 As outlined in the report, the site is an allocated site under Policy HU14 of the Huntingdonshire Local Plan to 2036 and is within the built-up area of a settlement. As such, there is no conflict with any of the Local Plan Policies concerning whether the location of development is suitable.
- 7.97 The scheme is wholly compliant with the development plan in all aspects.
- 7.98 In regard to the objection received from Anglian Water, as outlined above, the site is allocated and will provide 82 dwellings which is 8 less than the allocation. The site is wholly brownfield land which consists of a lawful factory use and a car park. The factory (although vacant) has an approved use in place and could be brought back into service at any time or replaced with a similar use. The agent has confirmed that the factory employed over 150 staff and operated 24/7 365 days a year. It should be noted that the factory had no restrictions on it regarding use of water or drainage, and predates modern construction methods which seeks to reduce the amount of water developments use. Naturally a degree of foul waste was generated by the staff as well as wastewater generated from the operational processes. Were the factory to resume operations then this would all result in discharge (at these rates) and potentially increased rates depending on the type of factory use to the Godmanchester WRC.
- 7.99 Whilst it cannot be guaranteed of the level of occupancy of the new development (e.g. if it would be fully occupied during the day thus producing more flows), the applicant has commissioned an assessment of the likely waste flows compared between the approved use and the proposed development. Whist this of course is only an estimate, even with some degree of tolerance there is a clear difference between the current flows from the lawful factory use and the proposed flows from the development. The development has been designed to ensure that no surface water enters the public foul network which will represent enhancement of the existing and historic measures of surface water disposal and result in a betterment to the existing situation.
- 7.100 Taking into account the existing lawful use of the site, it's brownfield status, it's allocation for development, the proposed design of the development to limit and deal with water on site, officers do not consider the Anglian Water objection warrants a refusal of the application in this instance. In addition to this, given that the Council cannot demonstrate a 5YHLS, the benefits of the redevelopment of brownfield land in highly sustainable location for the provision of 82 dwellings would significantly and demonstrably outweigh any identified conflict/harm in relation to the Anglian

Water comments about capacity at the relevant water recycling centre.

7.101 Having regard to all relevant material considerations, it is recommended that approval be granted.

8. RECOMMENDATION - APPROVAL subject to conditions to include those listed below:

- Time limit
- Approved plans
- Design including materials, architectural details etc.
- Permitted Development Rights for built form (extensions, outbuildings etc) to be removed for these northern properties due to flood risk and for certain dwellings to ensure adequate amenity space is retained and sensitive areas of the site is protected.
- Permitted Development Rights for boundary treatments and outbuildings for some dwellings in sensitive areas of the site to protect visual amenity.
- Pumping station details
- Compliance/details of hard and soft landscaping to include boundary treatments etc.
- Cycle storage (method of provision (where relevant) and provision.
- Levels details
- Tree protection
- External lighting
- Finished floor levels (amenity and flood mitigation)
- Tree protection
- Details of service gates
- Details of renewable energy provision (solar, heat pumps etc)
- Fire hydrants
- Archaeology investigations
- Ecology/BNG
- Highways conditions
- CEMP
- Details of mechanical ventilation
- Contaminated land
- Compliance with FRA
- Surface water drainage scheme to be submitted
- Foul drainage scheme to be submitted
- M4(2) dwellings
- Water efficiency

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CONTACT OFFICER:

Enquiries about this report to **Kevin Simpson Senior Development Management Officer** – lewis.tomlinson@huntingdonshire.gov.uk

Huntingdon Town Council Comments – 6th January 2026

A series of nine horizontal black bars of varying lengths, decreasing from left to right. The bars are positioned at different vertical intervals, creating a stepped effect. The first bar is the longest and is located at the top. The second bar is shorter and is located below the first. The third bar is the shortest and is located below the second. The fourth bar is longer than the third and is located below the second. The fifth bar is longer than the fourth and is located below the third. The sixth bar is longer than the fifth and is located below the fourth. The seventh bar is longer than the sixth and is located below the fifth. The eighth bar is longer than the seventh and is located below the sixth. The ninth bar is the longest bar in the series and is located at the bottom.

25/01587/FUL Demolition and part demolition of factory buildings and phased erection of 82 dwellings, access works, landscaping and associated development

R G E Engineering And Bridge Place Car Park The Avenue Godmanchester

No comment.

From: [REDACTED]
Sent: 07 January 2026 12:38:16 UTC+00:00
To: "DMAAdmin" <Development.ManagementAdmin@huntingdonshire.gov.uk>
Cc: [REDACTED]
Subject: Planning Applications - Godmanchester Town Council

Good morning

Please see our responses for the following applications,

- **Planning Application:** 25/02256/CLED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **Planning Application:** 25/01587/FUL

Location: R G E Engineering and Bridge Place Car Park

Work requested: Demolition and part demolition of factory buildings and phased erection of 82 dwellings, access works, landscaping and associated development

Response Date: 09.01.2026 (1wk extension granted)

The Portfolio Group is disappointed that its previous comments appear to have been largely disregarded and that no clear or direct response to the original points raised has been provided. The Portfolio Group therefore reaffirms and stands by its previous comments in full and requests that they continue to be afforded appropriate weight in the determination of this application.

While the Town Council is generally supportive of the principle of redevelopment at this location, a number of significant and unresolved concerns remain with the current proposal.

Members continue to express strong reservations regarding the proposed flat/parapet roof design, which is considered overly modern and not reflective of, or sympathetic to, the established character of the surrounding area. The Portfolio Group remains of the view that the design could and should be revised to better respond to its context.

The Portfolio Group also remains concerned about the adequacy of the submitted flood risk and drainage arrangements. In particular, the response provided to the Lead Local Flood Authority's comments is not considered sufficiently robust given the site's sensitive location and known flood risk constraints. The Council does not consider that the applicant's narrative response alone adequately resolves the LLFA's concerns, nor does it provide sufficient confidence that residual and exceedance risks have been fully addressed.

The Town Council previously recommended that consent for a footbridge across Cooks Stream, to provide access to the adjacent nature reserve, should be included as part of this application. This remains a key aspiration, and the Town Council reiterates its willingness to work constructively with Huntingdonshire District Council to help bring such a proposal forward in a meaningful and deliverable way.

Stronger commitments to environmental sustainability are also sought. The Portfolio Group wishes to see clearer and firmer provision for green technologies within the scheme, including renewable energy generation, external power outlets, and high energy-efficiency measures, to ensure the development contributes positively to climate change mitigation objectives.

Members continue to express significant concern regarding the reliance on a desktop highways assessment. This approach is considered inadequate given the scale of development proposed and the known sensitivities of the local highway network. In particular, the assessment does not properly account for the potential closure of the historic bridge into Huntingdon, nor does it convincingly justify the assumptions made about historic traffic levels associated with the former RGE site, which members consider to be dramatically overstated.

The Portfolio Group also requests that, should permission be contemplated, a specific planning condition be imposed to prevent the use of balconies for storage, in the interests of visual amenity, safety and the proper use of private amenity space.

The Portfolio Group has carefully considered the consultation response from Anglian Water and fully shares their concerns. In the absence of clear evidence that foul and surface water capacity issues have been satisfactorily resolved, the Town Council considers this to be a fundamental constraint to the acceptability of the proposal. The Portfolio Group places significant weight on Anglian Water's position and expects these matters to be fully resolved, rather than deferred, before the application progresses further.

Before the Town Council is able to offer support for this development, it would expect direct engagement and communication from Huntingdonshire District Council, together with a detailed, point-by-point and substantive response to the issues raised above.

This recommendation is based on the information available to the Planning Portfolio at the time of the meeting.

Due to the response date, the CEO/Town Clerk has, at the request of the Portfolio, confirmed this recommendation to Huntingdonshire District Council, using his delegated powers.

[REDACTED]
CEO (Town Clerk & RFO)
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Godmanchester Town Council | Town Hall | 1 Post Street | Godmanchester | PE29 2NB
ceo@godmanchester-tc.gov.uk



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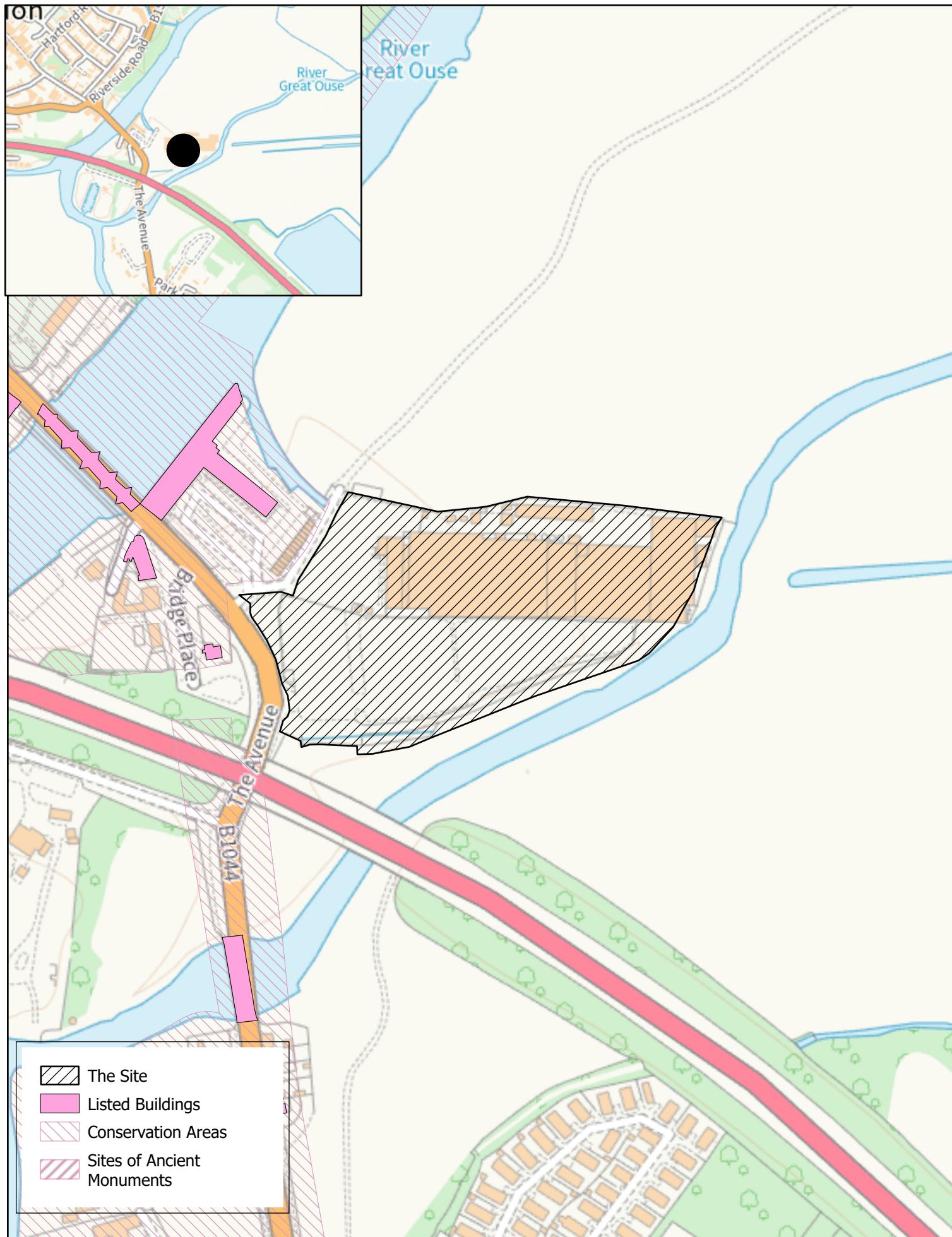
Development Management Committee

Application Ref: 25/01587/FUL



Scale = 1:2,500

Date Created: 11/02/2026











Street Elevation II

1 : 200



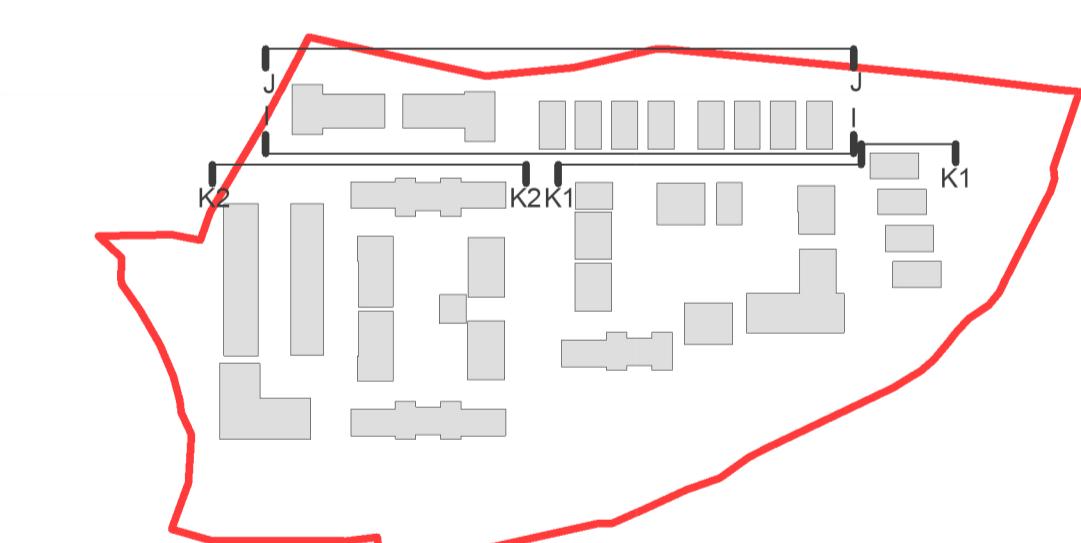
Street Elevation JJ

1 : 200



Street Elevation KK1

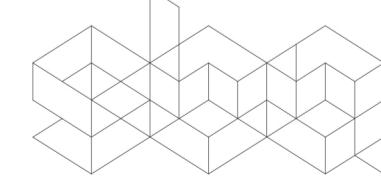
1 : 200



Street Elevation KK2

1 : 200

E	Northern boundary levels incorporated, missing trees added	02.02.26	NJ	BR
D	Updated as per Full App Initial Comments	YTB1	JJ	BR
C	PLANNING	18.07.25	JJ	BR
B	Planning Package	03.07.25	JJ	BR
A	Full package of plans and elevations	05.06.25	JJ	BR
No	Revision	Date	05.06.25	Chk
				Auh

 Scale 1:200		0	2	4	6	10m
Saunders Boston Architects 						
Client: Markham and George Property Ltd The Avenue, Huntingdon Drawing: Street Elevations II, JJ, KK						
Eastern Gate House, 119 Newmarket Road, Cambridge, CB5 8HA T: 01223 367733 office@saundersboston.co.uk						
The Governor, The Gallery, King's Wharf The Quay Estate, EX2 4AN T: 01392 348627 www.saundersboston.co.uk						
PLANNING						
SBA Project Code	Drawn	Date	As indicated @A1			
1702	JJ	02/06/25	Revision E			
Checked	BR	Sustainability Code		1702	-SBA-XX-XX-DR-A-243	



Street Elevation EE

1: 200

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 5 This drawing is to be read in conjunction with all other Consultants drawings and specifications.
 6 Drainage has not been surveyed and any/all pipe locations and below ground drainage runs are indicative.
 7 It is assumed that all works will be carried out by a competent contractor who will be working, where appropriate, to an approved method statement.



Street Elevation FF

1: 200

Existing Ground Level
 Levels to be adjusted through a detailed level strategy
 following full application approval



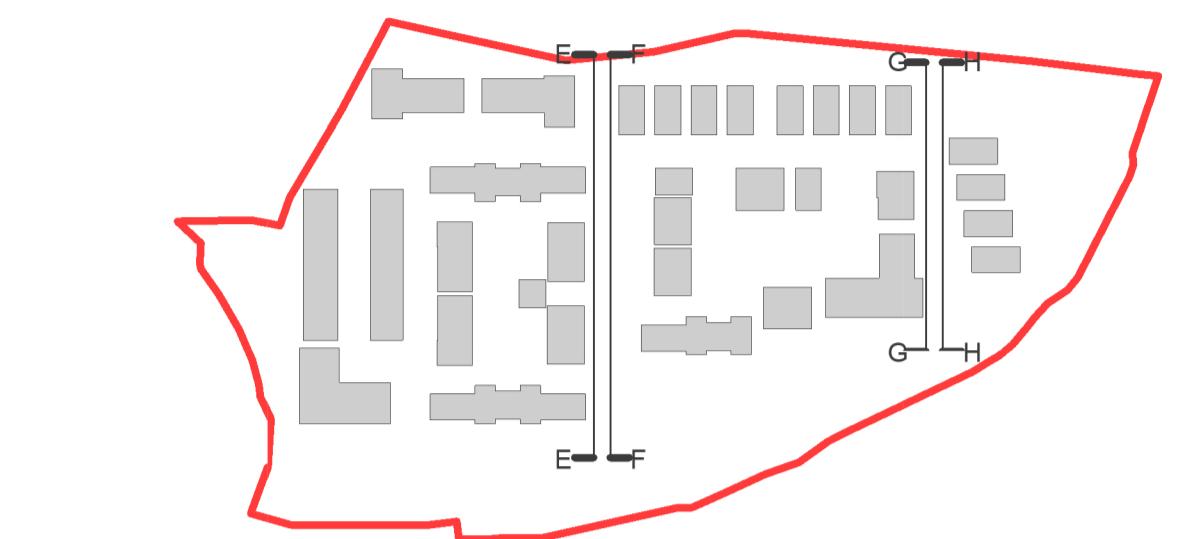
Street Elevation GG

1: 200



Street Elevation HH

1: 200



		Scale 1:200		
			0	2
E	Missing Trees added	02.02.26	NJ	BR
D	Updated as per Full App Initial Comments	YTB1	JJ	BR
C	PLANNING	18.07.25	JJ	BR
B	Planning Package	03.07.25	JJ	BR
A	Full package of plans and elevations	05.06.25	JJ	BR
No.	Revision	Date	Chk	Auh
Client Markham and George Property Ltd				
Job The Avenue, Huntingdon				
Drawing Street Elevations EE,FF,GG,HH				
Saunders Boston Architects <small>Eastern Gate House, 119 Newmarket Road, Cambridge, CB5 8HA T: 01223 367733 office@saunderston.co.uk The Galleria, The Gallery, King's Wharf, The Quay Estate, EX2 4AN T: 01392 348627 www.saundersboston.co.uk</small>				
PLANNING <small>SBA Project Code 1702 Drawn JJ Date 08/30/23 Checked BR Suitability Code</small>				
Scale As indicated @A1 Revision E 1702 1702 -SBA-XX-XX-DR-A-242				



Street Elevation AA

1 : 200

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Street Elevation BB1

1 : 200



Street Elevation BB2

1 : 200



Street Elevation CC

1 : 200



Street Elevation DD

1 : 200

N
Scale 1:200
0 2 4 6 10m

E Missing Trees added 02.02.26 NJ BR
 D Updated as per Full App Initial Comments YTB1 JJ BR
 C PLANNING 18.07.25 JJ BR
 B Planning Package 03.07.25 JJ BR
 A Full package of plans and elevations 05.06.25 JJ BR
 Revision Date Chk Auth

Client		Markham and George Property Ltd	
Job		The Avenue, Huntingdon	
Drawing		Street Elevations AA, BB, CC, DD	
PLANNING		Scale As indicated @A1 Revision E	
SBA Project Code 1702		Drawn JJ	Date 08/30/23
		Checked BR	Suitability Code
		1702	-SBA-XX-XX-DR-A-241