

DEVELOPMENT MANAGEMENT COMMITTEE 23rd February 2026

Case No: 25/01712/FUL

Proposal: CONVERSION OF EXISTING BUILDING INTO 7 RESIDENTIAL UNITS AND ERECTION OF 2 BUNGALOWS WITH ASSOCIATED LANDSCAPING AND DRAINAGE WORKS.

Location: 44 HUNTINGDON STREET, ST NEOTS, PE19 1DU

Applicant: OTAA ST NEOTS PROPERTY LTD

Grid Ref: 518637 260668

Date of Registration: 12.09.2025

Parish: ST NEOTS

RECOMMENDATION - REFUSE

This application is referred to the Development Management Committee (DMC) as the officer's recommendation is contrary to that of St Neots Town Council.

1. DESCRIPTION OF SITE AND APPLICATION

- 1.1 The application site is located on the east side of Huntingdon Street, and the north side of Dovehouse Close, within the built-up area of St Neots. The application site comprises a former Royal Air Force Association (RAFA) club; a private members club which closed down in 2023. A small part of the building within the application site is currently used as residential accommodation, however the majority of the building is vacant.
- 1.2 The application site is located within the St Neots Conservation Area and the building within it is a Grade II Listed Building referred to within the Official List Entry as No's 44 and 44A Huntingdon Street (List Entry Number: 1330995). The Official List Entry provides the following details of the building:

"1. HUNTINGDON STREET 1590 (East Side)

Nos 44 and 44A TL 1860 1/44

II

2. c18 front, perhaps to earlier building. 2 storeys. Timber framed and plastered. Tiled roof, north end gabled. Former Tuscan doorcase to south wing destroyed; 6 panelled door. Flush-framed sash windows with glazing bars. Lower extension on south side.

Listing NGR: TL1863260659."

- 1.3 The application site is predominantly surrounded by residential properties, although is separated from them on the south and west sides

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by the intervening roads of Dovehouse Close and Huntingdon Street respectively.

- 1.4 The application site contains two mature Sycamore trees which are afforded statutory protection due to their location within a Conservation Area and, in the case of one of them, a Tree Protection Order.
- 1.5 The application site is located partly within Flood Zone 1 (low probability of flooding from rivers and sea) and partly within Flood Zone 2 (medium probability of flooding from rivers and sea). The application site is at low risk of flooding from all sources, according to the Environment Agency's Flood Map for Planning Flooding and the Council's Strategic Flood Risk Assessment maps.
- 1.6 The application seeks full planning permission for the conversion of the existing Listed Building to 7No. residential units and 2No. bungalows within the curtilage of the Listed Building, with associated landscaping and drainage works. The proposal includes a parking area serving the proposed dwellings which would be accessed via an existing vehicular access located on the north side of Dovehouse Close.
- 1.7 The application is accompanied by the following documents:
 - Planning Statement
 - Design and Access Statement
 - Heritage Statement
 - Intrusive Survey Report
 - Flood Risk Assessment
 - Ecological Appraisal
 - Biodiversity Net Gain Metric
 - Biodiversity Net Gain Assessment
 - Emergency and Activity Bat Survey
 - Arboricultural Impact Assessment
 - Existing and Proposed Plans
- 1.8 Officers have scrutinised the plans and have familiarised themselves with the site and surrounding area.

2. NATIONAL GUIDANCE

- 2.1 The National Planning Policy Framework (December 2024) (NPPF 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):
 - achieving sustainable development;
 - delivering a sufficient supply of homes;
 - building a strong, competitive economy;
 - promoting healthy and safe communities;
 - promoting sustainable transport;
 - achieving well-designed places;

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- meeting the challenge of climate change, flooding and coastal change;
- conserving and enhancing the natural environment;
- conserving and enhancing the historic environment.

2.3 Sections 66 and 72 of 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: <https://www.gov.uk>

3. PLANNING POLICIES

3.1 St Neots Neighbourhood Plan 2014-2029 – Made February 2019

- A3: Design
- PT1: Sustainable Travel
- PT2: Vehicle Parking Standards for Residential Development
- P4: Flooding
- SS3: Service and Provision

3.2 Huntingdonshire's Local Plan to 2036 - Adopted May 2019

- LP1: Amount of Development
- LP2: Strategy for Development
- LP4: Contributing to Infrastructure Delivery
- LP5: Flood Risk
- LP6: Waste Water Management
- LP7: Spatial Planning Areas
- LP11: Design Context
- LP12: Design Implementation
- LP14: Amenity
- LP15: Surface Water
- LP16: Sustainable Travel
- LP17: Parking Provision and Vehicle Movement
- LP25: Housing Mix
- LP30: Biodiversity and Geodiversity
- LP31: Trees, Woodland, Hedges and Hedgerows
- LP34: Heritage Assets and their Settings
- LP37: Ground Contamination and Groundwater Pollution

3.3 Supplementary Planning Documents (SPD) and Guidance:

- Huntingdonshire Design Guide SPD (2017)
- Huntingdonshire Landscape and Townscape SPD (2022)
- Developer Contributions SPD (2011)
- Cambridgeshire Flood and Water SPD (2017)
- St Neots Conservation Area Character Assessment (2006)
- Annual Monitoring Report, regarding housing land supply

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

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- I3 – Create character and identity
- B2 - Appropriate building types and forms
- M3 - Well-considered parking, servicing and utilities infrastructure for all users
- N3 - Support rich and varied biodiversity
- 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 <https://www.gov.uk>

4. RELEVANT PLANNING HISTORY

- 4.1 25/01713/LBC - Conversion of existing building into 7 residential units and erection of 2 bungalows with associated landscaping and drainage works - Pending consideration and reported to this Committee
- 4.2 0803363TREE - Crown lifting of one Sycamore tree – Granted 02.03.2009
- 4.3 9900695FUL - Erection of conservatory – Granted 28.07.1999
- 4.4 9900696LBC - Erection of conservatory – Granted 28.07.1999
- 4.5 9900185FUL - Erection of conservatory RAF Association Astra Club 44 Huntingdon Street St Neots – Refuse 09.04.1999
- 4.6 9801580LBC - Erection of conservatory RAF Association Astra Club 44 Huntingdon Street St Neots – Refused 18.02.1999
- 4.7 9700875LBC - Affix light unit Royal Air Forces Association 44 Huntingdon Street St Neots – Granted 13.10.1997
- 4.8 9700874ADV - Illuminated sign Royal Air Forces Association 44 Huntingdon Street St Neots – Granted 13.10.1997
- 4.9 9600840FUL - Extension to storage building RAF Association Astra Club 44 Huntingdon Street St Neots – Granted 27.08.1996
- 4.10 9600841LBC - Extension to storage building RAF Association Astra Club 44 Huntingdon Street St Neots – Granted 27.08.1996
- 4.11 9100742LBC - Demolition of chimney – Refused 26.07.1991
- 4.12 8601302FUL - Storage building, Astra United Services Club, 44 Huntingdon Street, St. Neots – Granted 03.02.1987
- 4.13 8601563LBC - Remove wooden sheds and construct storage cellar 44 Huntingdon Street, St. Neots – Granted 03.02.1987

5. CONSULTATIONS

- 5.1 St Neots Town Council – Supports the application. Considers the proposal would assimilate itself to the existing part of the town and that it makes efficient use of the site.
- 5.2 HDC Conservation Officer – Objects to the application.

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1. Building and Site

The building is a Grade II Listed Building (named in the listing as 44 and 44a Huntingdon Street). It also stands within the Conservation Area and opposite the Listed Building The Globe Public House, 77 Huntingdon Street (Grade II).

2. Proposal

The applicant proposes to convert and divide the existing building into residential units with alterations and repairs throughout the building. Also proposed is the addition of two new dwellings within the existing rear car park of the property.

3. Assessment

The listing describes 44 to 46 Huntingdon Street as having an 18th century front to an earlier building, and being of timber framed construction and plastered, of two storeys with a tiled roof, the north end gabled. Also referred to is a Tuscan doorcase to the south wing (destroyed), six panelled door and flush framed sash windows with glazing bars. The listing also refers to a lower extension on the south side.

The Globe Public House is described in its listing as dating from the 18th century, of two storeys with a rear wing, and timber framed with roughcast facing and a hipped tiled roof, and with a hipped ground floor bay window and flush framed sash and Yorkshire sash windows.

St Neots Conservation Area Character Statement describes the area containing the proposal site as the Medieval Core Settlement Area. The building 44 to 46 Huntingdon Street is shown on the historic maps within the Statement as being on the northern edge of the settlement on the main north road and the building has a similar appearance to other buildings in the town such as those on Church Street, High Street, Brook Street, and St Mary's Street.

The applicant proposes to convert the existing building at 44 to 46 Huntingdon Street, most recently the RAFA Members Club, including two first floor flats, into seven dwellings. Also proposed are the construction of two new dwellings within the existing rear car park and the addition of three parking spaces and eighteen cycle bays.

4. Conclusion

The 1990 Act gives local planning authorities a general duty to preserve Listed Buildings and to preserve or enhance the character or appearance of Conservation Areas (s.66 and s.72 Planning (Listed Buildings and Conservation Areas) Act 1990). The National Planning Policy Framework December 2024 states that Local planning authorities need to take account of the desirability of sustaining and enhancing the significance of heritage assets (Para 210). The NPPF 2024 also states that great weight should be given to the conservation of a heritage asset (Para 212) and that any harm to or loss of significance should require clear and convincing justification (Para 213). The NPPF 2024 states that where a development proposal will lead to less than substantial harm to

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the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use (Para 215). The NPPF 2024 requires that an applicant should describe the significance of any heritage assets affected, including any contribution made by their setting and that the detail should be sufficient to understand the potential impact of the proposal on their significance (Para 207). Local Planning Authorities are required to look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. (Para 219)

A site visit was carried out on 2/10/24. Limited investigative works to the building, were agreed with Huntingdonshire DC on 24/2/25, during which modern fabric additions to the building were identified.

The whole of the building currently known as 44 to 46 Huntingdon Street is in a single ownership and use as the former RAFA Members Club. The building was first listed as a Listed Building on 28/3/74. A list description is short, intended only for location of the building and is not a complete description, in addition property numbers and street names have often changed between the date of listing and today. Therefore the address of the building on the listing in itself cannot be taken as the extent of the Listed Building.

The applicant proposes to make alterations throughout the building and has submitted a Heritage Statement. However, the information in the Heritage Statement, although useful, provides map and documentary information and photographs related to the exterior of the building and site but does not provide information about the structure or the interior of the existing building.

Full details of construction, fabric, features, historic plan, materials and methods of construction as well as a phasing plan of the building to show the dates and sequence of construction of the different elements of the existing building are needed. A thorough understanding of the Listed Building is required in order to be able to assess the potential impact of the proposals on its significance.

The building is comprised of a number of elements of different construction, materials and design. For example at least some historic timber frame construction and some brick construction; variations of windows design and fenestration layout, etc. Although reference is made in the submitted documents to surviving historic fabric and features no details have been provided.

The existing rear Conservatory is a modern addition of uPVC. Its demolition is likely to be supported but the applicant needs to fully explain the potential impact of the proposed alterations on the rest of the building and the stability of the structure.

The existing flat roofed extension runs along the rear elevation of the southern part of the building. At this point the ground floor of the rear elevation has been removed and appears to be supported on pillars within the building. A Structural Engineer's Report is required in relation to any proposed alterations to this part of the building.

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The proposal introduces a number of openings into the street elevation of the building which would alter the existing character of this part of the building which currently has no openings.

The pitched roof rear extension, which runs perpendicular to the rear elevation of the main building, is proposed to be removed. It adjoins the main building and forms part of the Listed Building, accessed via an internal door, so details of the construction, features and date of this extension and justification for its demolition are needed.

Maps on record at Huntingdonshire DC show another extension at the rear of the building, in addition to that on the submitted plan and seen at the site visit so the applicant should provide an explanation for this anomaly.

An extension is proposed to adjoin the south end of the existing building but no details of the existing building and the proposed alterations and addition to it have been submitted. Alterations are also proposed to the existing second floor which currently appears to be an unused roofspace to is likely to be an unaltered part of the historic building and this information may help in the dating and phasing of the different elements of the building, but no details have been submitted of the existing building or proposed works to it. Numerous historic features remain within the building and its complex historic construction is visible within the building. Features such as the existing passageway, currently blocked and obscured by the kitchen wall at first floor, are important to an understanding of the history and significance of the building. Therefore without full details of the building and proposals it is not possible to make a full assessment of the potential impact of any proposed design.

Also proposed is the construction of a building containing two adjoining single storey dwellings within the existing rear car park of the Listed Building. They have a large footprint, broad in comparison to the Listed Building, and a design which is not sympathetic to the character of the Listed Building. The proposed dwellings would stand adjacent to the Listed Building and close to it and would be prominent in views of the Listed Building and within its setting.

The building itself is a landmark building within Huntingdon Street and St Neots Conservation Area Character Statement describes the area containing the proposal site as the Medieval Core Settlement Area. The Victoria County History describes Huntingdon Street as dating from the 13th century and as the principal residential quarter of the town in the 17th century. This Listed Building appears similar to other historic buildings in St Neots and its appearance and construction suggests it is one of the oldest in Huntingdon Street. It is therefore important as a Listed Building and also as an element of the Conservation Area as a survivor of historic St Neots.

The proposed development adjacent to the Listed Building and within the existing rear garden and car park intrudes harmfully into the setting of the Listed Building.

The proposed side extension to the Listed Building, continuing along the front of the site, is considered harmful as there are no details of the proposed alterations to the existing building and the proposed extension

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alters the character of the building by introducing a long domestic range to the southern end of the building. A full assessment of the potential impact on the Listed Building and Conservation Area cannot be made and there is no clear and convincing justification submitted in support of this proposal.

Historic structure, fabric and features survive within the existing building and need to be identified and preserved. For example, there are three existing staircases within the building which are not modern additions and may relate to a historic phase or phases of the Listed Building. For example, internal partition walls may be historic and should not be assumed to be modern additions. For example, existing stubs of walls within the building and changes in floor levels help to identify the historic layout of the building. Such details should be included in submitted drawings and identified and explained to enable an understanding of the significance of the Listed Building and the potential impact of the proposals.

There is evidence of considerable survival within the building of historic wall and ceiling plaster, historic doors, historic timber partition walls, historic windows, staircases, fireplaces, floorboards and surviving layout, and although some windows are modern others appear to be historic. Alterations have previously been carried out on the ground floor, but the first floor rooms have not been extensively altered so fabric and features within those rooms are likely to be historic and should remain unaltered. Proposed alterations require a description of the existing fabric and features, details of proposed alterations, and justification in each case.

Any proposals which are intended to reinstate lost features or layout of the historic building need to be supported with evidence. For example historic plans, photographs or description of visible alterations or fabric, such as blocked doorways/windows, wall stubs etc. All proposed alterations need to be fully explained, described and justified, with references to the existing building, structure, fabric, design, layout, features and how the proposed alterations to existing fabric and features will preserve the existing character and how new work will also do this. Proposed methods, materials and finishes are also important and should follow the surviving historic fabric, features, etc. Full details and justification is needed for all proposed demolition and alterations to the building with details of all works including making good, to include details of design, methods and materials in each case.

On the basis of the submitted information the proposals are considered to be harmful to the significance of the Listed Building because of the alterations and additions to the building and the removal of features and fabric which contribute to its significance as well as to its architectural and historic interest.

In addition, the proposed new dwellings appear harmful to the setting of the Listed Building because of their scale, design, materials, features and relationship to the Listed Building.

For the same reasons the proposals appear to be harmful to the character appearance and significance of the Conservation Area.

Therefore, recommendation is not to support this proposal.

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5.3 HDC Arboricultural Officer – No significant objections, however has reservations about the on-going relationship between residents and a Sycamore tree (T2) within the site which is the subject of a Tree Preservation Order.

- Feels that Plot 1 and 2 will be heavily shaded and pressure for removal and inappropriate pruning will be high.
- Although the trees' vitality is reduced, this is exaggerated by statements such as 'the tree produces very few leaves in the summer' which is not the case.
- There is no space allowed for any future growth or construction around the canopy of T2.
- Works with the RPA of T2 are quite extensive and will involve the removal of surfaces, installation of new ones, and re-landscaping. RPA incursions are only just within acceptable boundaries.
- To be classified as a Category C tree it would need a life expectancy of less than 20 years – this may be debated, and contests that given good care the tree would last longer than this.
- No Method Statement has been provided as to how the surfacing is to be removed and replaced without damage to the rooting environment underneath.
- Rebuttal confirms no construction within the RPA but also that a Canopy/Car-Port will be built in the RPA to protect the vehicles from falling debris.

5.4 CCC Highways – The proposed development is acceptable in principle. Vehicle turning may be achievable, but remains very constrained and would likely require multiple manoeuvres. When the car park is at capacity, vehicles may resort to reversing into Dovehouse Close. While reversing into the street is not ideal, it is not considered inherently unsafe. Despite reservations, it is not anticipated that the proposal would result in a significant adverse impact on the public highway. Request conditions to secure provision of adequate parking and turning, drainage measures, access construction/surfacing, and to restrict the location of any gate/s.

HDC Environmental Health – No objection in relation to environmental protection matters.

Anglian Water – Objects as there are no details of how surface water will be discharged. States that St Neots Water Recycling Centre (WRC) currently has sufficient capacity to accommodate foul water flows from the proposed development and the WRC is included within Anglian Water's Business Plan as a named growth scheme with investment delivery planned between 2025-2030. Requests a condition requiring Anglian Water to confirm available capacity of the WRC prior to occupation, unless first occupied after April 2030.

6 REPRESENTATIONS

6.1 50 neighbouring properties have been directly notified of the application by letter. In addition, a Press Advert was published in the Hunts post on 24th September 2025 and a site notice was displayed near to the site on 10th October 2025. No representations have been received from local residents / interested parties in response to this.

7 ASSESSMENT

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- 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 paragraph 48 of 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 (as relevant to this application) consists of:
 - The St Neots Neighbourhood Plan (2019)
 - Huntingdonshire's Local Plan to 2036 (2019)
 - Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
- 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:
 - Principle of development
 - Visual amenity and heritage assets
 - Residential amenity
 - Highway safety and parking provision
 - Flood risk and drainage
 - Trees
 - Biodiversity
 - Waste storage
 - Accessible and adaptable dwellings
 - Water efficiency
 - Developer contributions

Principle of development

- 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 the Council's housing requirement.
- 7.7 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).

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7.8 As Huntingdonshire's Local Plan to 2036 (the Local Plan) 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. Paragraph 78 of the NPPF also requires provision of a buffer to ensure choice and competition in the market for land.

7.9 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.

7.10 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'.

7.11 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.

7.12 In assessing this application, whilst policy LP7 (Spatial Planning Areas) of the Local Plan is out of date (and so afforded less weight in the determination of this application), it is not to be entirely disregarded. In addition, the overarching principles of sustainable development as defined in paragraph 11 of the NPPF are afforded weight in the determination of this application.

7.13 Policy LP7 of the Local Plan states that a proposal for housing development will be supported where it is appropriately located within a built-up area of an identified Spatial Planning Area settlement.

7.14 The proposal is for residential development within the built-up area of a Spatial Planning Area settlement, in accordance with policy LP7 of the Local Plan. Residential development is considered to be sustainable in this location, as it would be located within close proximity to a wide-range of everyday services and facilities which can be conveniently accessed by sustainable modes of travel including walking, cycling and public transport.

7.15 In addition, Policy LP22 of the Local Plan states that, where permitted development rights do not apply, a proposal which involves the loss of a local service or community facility will only be supported where:

- an equivalent service or community facility will be provided in a location with an equal or better level of accessibility for the community it is intended to serve; or
- it demonstrates that there is no reasonable prospect of that service or facility being retained or restored because either:
 - i. there is insufficient community support for its continuation; or

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- ii. reasonable steps have been taken to effectively market the property for its current use without success.

7.16 The building was previously used as a RAFA private members club. Although it was a private members club, it is still considered that the building provided a community facility. The application is accompanied by a Planning Statement which states that the RAFA club had become unsustainable from membership, use and financial perspectives for at least 15 years prior to its closure in 2023. This is supported by evidence of an article published within the Hunts Post in 2012 which indicated that the club was at threat of closure as it was becoming unsustainable to continue operating. The Planning Statement states that, by 2023, the continued operation of the club could no longer be sustained by the St Neots branch of the RAFA and at a Special General Meeting it was resolved to surrender it back to the RAFA for sale. The Planning Statement also states that, as the building was not open to the public, the building was operated very differently from a traditional commercial public house. Due to the specific nature of the use as a RAFA private members club, and as there is evidence to indicate that this former use became unsustainable to continue, it is considered that the application demonstrates that there is no reasonable prospect of that facility being retained or restored. Therefore, the loss of the community facility is supported in this instance, in accordance with policy LP22 of the Local Plan.

7.17 The principle of residential development in this location and the loss of a community facility is therefore considered to be acceptable.

Visual amenity and heritage assets

7.18 Paragraph 207 of the NPPF states that, in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting, and that the detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance

7.19 Paragraph 210 of the NPPF states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

7.20 Paragraph 212 of the NPPF states 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.

7.21 Paragraph 213 of the NPPF states that any harm to, or loss of, significance of a designated heritage asset (from its clear alteration or destruction, or from development within its setting), should require clear and convincing justification.

7.22 Paragraph 215 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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7.23 Policy A3 of the Neighbourhood Plan states that all development must be designed to a high quality that reinforces local distinctiveness. In addition, it states that design should be guided by the overall scale, density, massing, height, landscape, layout, materials, detailing, roof orientation, relationship to back of pavement, wall to window ratios, proportion of windows, plan depth, plot width and access, the site and its surroundings including considerations of flood risk management.

7.24 Policies LP11 and LP12 of the Local Plan requires new development to respond positively to its context, draw inspiration from the key characteristics of its surroundings, and contribute positively to the character and identity of the area.

7.25 Policy LP34 of the Local Plan requires new development to protect the significance of designated heritage assets and their settings; not harm or detract from the significance of the heritage asset, its setting and any special features that contribute to its special architectural or historic interest; respect the historic form, fabric and special interest that contributes to the significance of the affected heritage asset; conserve or enhance the quality, distinctiveness and character of the affected heritage asset; and contribute to securing the long-term maintenance and management of the heritage asset. In addition, Policy LP34 of the Local Plan requires new development within a Conservation Area to preserve, and wherever possible enhance, features that contribute positively to the area's character, appearance and setting.

7.26 The proposed development comprises the conversion of the Grade II Listed Building into 7No. residential units and the erection of a pair of semi-detached single-storey dwellings within the curtilage of the Listed Building.

7.27 The Official List Entry describes the Listed Building as having an 18th century front to an earlier building, and being of timber framed construction and plastered, of two storeys with a tiled roof, the north end gabled, and a lower extension to the southern end. It also references a Tuscan doorcase to the south wing (destroyed), six panelled door and flush framed sash windows with glazing bars. The application site is located within the St Neots Conservation Area and an area described within the St Neots Conservation Area Character Assessment as the 'Medieval Core Settlement Area'. The Victoria County History describes Huntingdon Street as dating from the 13th century and as the principal residential quarter of the town in the 17th century. The Conservation Officer describes the Listed Building as 'a landmark building within Huntingdon Street' and states that its appearance and construction suggests it is one of the oldest in Huntingdon Street. The Listed Building is therefore important as a Listed Building in its own right and also as an element of the Conservation Area due to it being a survivor of historic St Neots. Due to its location, the proposed development would affect both of these designated heritage assets.

7.28 The Conservation Officer carried out an inspection of the Listed Building in October 2024 (prior to this planning application) and subsequently agreed limited investigative works which identified modern fabric additions to the Listed Building. Despite this, there are many elements of the historic structure, fabric and features which survive within the Listed Building and need to be identified and preserved. Examples include three existing staircases which are not modern additions and may relate

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to a historic phase or phases of the Listed Building, internal partition walls which may be historic and should not be assumed to be modern additions, and existing stubs of walls within the building and changes in floor levels which help to identify the historic layout of the building. There is also evidence of considerable survival of historic wall and ceiling plaster, historic doors, historic timber partition walls, historic windows, staircases, fireplaces, floorboards and surviving layout.

- 7.29 The proposed development would subdivide the Listed Building into smaller individual units and includes alterations and repairs to the Listed Building. In addition, the proposed development includes an extension to the southern end of the Listed Building and demolition of some previous extensions to the building. In respect of the current application, the Conservation Officer has stated that the proposed alterations, extension and demolition works require a description of the existing fabric and features, details of proposed alterations, and justification in each case; to enable an understanding of the significance of the Listed Building and the potential impacts of the proposed development.
- 7.30 The application is accompanied by a Heritage Statement, however officers consider it to contain insufficient information about the structure or the interior of the Listed Building. The Listed Building is comprised of a number of elements of different construction, materials and design, and it retains numerous historic features which are important to an understanding of the history and significance of the building. Although reference is made in the submitted documents to surviving historic fabric and features, the application is not accompanied by sufficient details of them. The Conservation Officer has stated that full details of construction, fabric, features, historic plan, materials and methods of construction, in addition to a phasing plan of the building to show the dates and sequence of construction of the different elements of the existing building, are required in order to be able to assess the potential impacts of the proposed development on the significance of the Listed Building.
- 7.31 There is an existing flat roof extension adjoining part of the rear of the Listed Building, where the ground floor rear elevation has been removed and appears to be supported on pillars within the building. The Conservation Officer has recommended that a Structural Engineer's Report is required in relation to any proposed alterations to this part of the building.
- 7.32 The proposed development includes an extension to the southern end of Listed Building, which is considered to be harmful to the character and appearance of the Listed Building and the Conservation Area due to it introducing a long domestic range to the Listed Building without any clear or convincing justification. In addition, the application is not accompanied by sufficient details of the proposed alterations to the existing building and the proposed extension to enable a full assessment of the potential impacts on the historic fabric and significance of the affected part of the Listed Building.
- 7.33 The proposed development includes the demolition of a upvc conservatory. Although this element of the proposed development is likely to be acceptable in principle, the application fails to demonstrate the potential impacts of the demolition of the conservatory on the historic fabric and stability of the Listed Building.

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7.34 The proposed development includes the demolition of an existing pitched-roof extension which runs perpendicular to the rear elevation of the Listed Building, however the application is not accompanied by sufficient details of the construction, features and date of this extension or justification for its demolition.

7.35 The Conservation Officer states that any proposals which are intended to reinstate lost features or the layout of the historic building need to be supported with evidence, and that all proposed alterations and demolition works need to be fully explained, described and justified, with details of all works to include details of design, methods and materials in each case. In the absence of full details of the existing Listed Building and proposals, officers are unable to make a full assessment of the potential impact of the proposed development on the Listed Building and therefore the proposals are considered to be harmful to the significance of the Listed Building because of the alterations and additions to the building and the removal of features and fabric which contribute to its significance as well as to its architectural and historic interest.

7.36 The proposed semi-detached bungalows would occupy a large footprint within the curtilage of the Listed Building, within close proximity to the Listed Building and prominent in views to and from the Listed Building and the Conservation Area. By virtue of their scale, design, features and relationship to the Listed Building and Conservation Area, the proposed bungalows would result in less than substantial harm to the character, appearance, setting and significance of the Listed Building and Conservation Area.

7.37 In summary, the application is not accompanied by sufficient information to enable the Local Planning Authority to make a full assessment of the impacts of the proposed development on the Listed Building. Furthermore, on the basis of the information accompanying the application, the proposed alterations and extension to the Listed Building, in addition to the removal of historic features and fabric which contribute to its significance and its architectural and historic interest, would result in harm to the character, appearance, setting and significance of the Listed Building and the Conservation Area. In addition, the proposed bungalows, car parking area and gardens would result in a cramped and contrived form and layout of development within the curtilage of the Listed Building and the Conservation Area; and the proposed bungalows, by virtue of their siting, scale and incoherent design, would appear unsympathetic to the Listed Building and the Conservation Area. For these reasons, the proposed development is not designed to a high quality that reinforces local distinctiveness, and it would result in less than substantial harm to the character, appearance, setting and significance of the Listed Building and the Conservation Area which would outweigh the benefits of the proposed development, contrary to Policy A3 of the St Neots Neighbourhood Plan (2016), policies LP11, LP12 and LP34 of the Huntingdonshire Local Plan to 2036, and the provisions of the National Planning Policy Framework.

Residential amenity

7.38 Policy LP14 of the Local Plan states a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the

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proposed development and maintained for users and occupiers of neighbouring land and buildings.

7.39 The application site is predominantly surrounded by residential properties, although is separated from them on the south and west sides by the intervening roads of Dovehouse Close and Huntingdon Street respectively.

7.40 The residential properties most likely to be impacted by the proposed development would those which are located immediately adjacent to the application site, which comprise The Sycamores a block of flats (The Sycamores) to the north and a bungalow (North Lodge) to the east. However, as the proposed dwellings would have generous separation distances from the neighbouring properties, it is considered that the proposed development would maintain a high standard of amenity for users and occupiers of neighbouring land and buildings.

7.41 However, it is considered that the proposed development would fail to provide a high standard of amenity for future occupiers of the proposed bungalows (Plots 08 and 09) for the reasons specified below:

- Future occupants of Plot 08 would have a poor outlook from the bedroom window within its west elevation due its close proximity of approximately 0.9 metres from the rear boundary treatment of Plot 06.
- Future occupants of Plot 09 would be detrimentally impacted by noise and light from vehicles using the proposed communal parking courtyard, due to the close proximity in which vehicles would travel past the windows (including a bedroom window and kitchen/living room window) within its east elevation and the absence of an intervening boundary treatment to mitigate such impacts.
- Plots 08 and 09 would have a poor level of privacy:
 - internally, due to all bedroom windows being located immediately adjacent to, or within very close proximity to, the communal access and footways located to the east, south and west of those plots;
 - externally, due to the close proximity of the rear gardens to the first-floor rear elevation windows of plots 01-07.

7.42 It is therefore considered that, although the proposed development would maintain a high standard of amenity for users and occupiers of neighbouring land and buildings, the proposed development would fail to provide a high standard of amenity for future occupiers of the proposed development, contrary to policy LP14 of the Local Plan.

Highway safety and parking provision

7.43 Policy PT1 of the Neighbourhood Plan states that development proposals must demonstrate how opportunities for the use of sustainable modes of transport are maximised, which should be achieved through maximising the potential for cycling and walking throughout the site and through contributions towards the extension, linking, and/or improvement of existing routes throughout St Neots.

7.44 Policy PT2 of the Neighbourhood Plan states that all development proposals which include an element of residential development,

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including change of use to residential, must provide adequate space for vehicle parking to meet the expected needs of residents and visitors. In addition, it states that a design-led approach should be taken to ensure parking is properly integrated into the layout of the scheme, minimises adverse impacts on surrounding uses, and facilitates traffic flow and accessibility for service and emergency vehicles

- 7.45 Policy LP16 of the Local Plan encourages sustainable transport modes. In addition, policy LP17 of the Local Plan seeks 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.
- 7.46 There is an existing vehicular access located on the north side of Dovehouse Close, which currently provides access to a private car parking area to the rear of the Listed Building. The proposed development would be served by the existing vehicular access and would provide 9 car parking spaces to serve the proposed development, which would be equivalent to 1 car parking space per dwelling. The proposed development includes cycle storage within the rear gardens of the proposed dwellings. Cycle storage could be secured by a planning condition in any event of planning permission being granted. With consideration given to the sustainable location of the site, particularly with regards to its close proximity to a wide range of services and facilities located within St Neots town centre and good access to public transport links, it is considered that the proposed development would encourage the use of sustainable modes of transport and would provide an adequate level of car and cycle parking provision, in accordance with policies PT1 and PT2 of the Neighbourhood Plan and policies LP16 and LP17 of the Local Plan.
- 7.47 The Local Highway Authority has commented that the vehicle turning within the site is very constrained and would likely require multiple manoeuvres, or vehicles reversing out of the site onto Dovehouse Close if all of the car parking spaces are occupied. However, they have stated that while reversing into the street is not ideal, it is not considered inherently unsafe and it is not anticipated that the proposed development would result in a significant adverse impact on the public highway. The Local Highway Authority has therefore stated that the proposed development is acceptable in principle and request conditions to secure the provision of adequate parking and turning, drainage measures, access construction/surfacing, and to restrict the location of any gate/s. With consideration given to the recommendation of the Local Highway Authority, it is considered that the proposal is unlikely to have any adverse effect on the public highway.
- 7.48 It is therefore considered that the proposal has acceptable highway and parking impacts, in accordance with policies PT1 and PT2 of the Neighbourhood Plan and policies LP16 and LP17 of the Local Plan.

Flood risk and drainage

- 7.49 Policy LP5 of the Local Plan states that a proposal will only be supported where all forms of flood risk, including breaches of flood defences or other defence failures, have been addressed, as detailed in the National Planning Practice Guidance and with reference to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD), such that:

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- a. the sequential approach and sequential test are applied and passed, having regard to actual and residual flood risk and including consideration of the impact of climate change;
- b. if necessary the exception test is applied and passed;
- c. development has been sequentially located within the site to avoid flood risk;
- d. all reasonable opportunities to reduce overall flood risk have been considered and where possible taken;
- e. the integrity of existing flood defences is not adversely affected and any necessary flood mitigation and compensation measures have been agreed with relevant bodies and the Council; and
- f. the requirements relating to flood risk set out in the Cambridgeshire Flood and Water SPD have been applied.

7.50 Policy LP5 of the Local Plan is consistent with the requirements set out within the NPPF and guidance set out within NPPG in that they require the Sequential Test (and the Exception Test, if necessary) to be applied, where development is proposed in areas at risk from any form of flooding.

7.51 Paragraph 174 of the NPPF states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source, and that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. In addition, paragraph 023 of National Planning Practice Guidance states that the sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk; which means avoiding, so far as possible, development in current and future medium-high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.

7.52 Paragraph 178 of the NPPF states that, to pass the exception test, it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.53 Guidance contained within Section 4 of the Cambridgeshire Flood and Water SPD is consistent with policy LP5 of the Local Plan and the provisions of the NPPF and National Planning Practice Guidance.

7.54 The application site is located partly within Flood Zone 1 (low probability of flooding from rivers and sea) and partly within Flood Zone 2 (medium probability of flooding from rivers and sea).

7.55 The Flood Risk Assessment accompanying the application states that the aspects of the application that relate to the conversion and change of use of the RAFA club building do not require a sequential test, as paragraph 176 of the NPPF states that changes of use should not be subject to the sequential test. In addition, the Flood Risk Assessment states that the new dwellings do not require a sequential test as paragraph 175 of the NPPF states that the sequential test should not be used in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary,

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including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

7.56 Whilst officers acknowledge that the change of use of the existing building to residential does not require a sequential test under the provisions of paragraph 176 of the NPPF, the proposed development also includes an extension to the south of the existing building to accommodate new residential units within Flood Zone 2. As this element of the proposed development would result in the erection of new dwellings within Flood Zone 2, the sequential test is required. In addition, whilst officers acknowledge the provisions of paragraph 175 of the NPPF, the proposed development includes built development in the form of an extended car parking area within Flood Zone 2 for which the sequential test is required. However, the application is not accompanied by any evidence to demonstrate that there are no reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (i.e. Flood Zone 1). The application therefore fails to demonstrate that the sequential test has been passed.

7.57 In respect of the exception test, the proposed development fails to provide wider sustainability benefits to the community that outweigh the flood risk, particularly with regards to the harm to heritage assets that would result from the proposed development.

7.58 It is therefore considered that the proposed development fails to pass the sequential test and exception test for flood risk, contrary to policy 5 of the Local Plan, paragraph 174 of the NPPF and guidance contained within Section 4 of the Cambridgeshire Flood and Water SPD.

7.59 It is acknowledged that Anglian Water has objected to the proposed development due to the application not containing any details of how surface water will be discharged. In addition, Anglian Water states that there is currently adequate capacity to accept foul water flows from the proposed development and recommends a condition to ensure adequate foul water impacts. Officers do not consider the foul water condition recommended by Anglian Water meets the relevant tests for a planning condition; however, with consideration given to the existing use of the site and the proposal being for a minor development, officers consider that it would be reasonable to secure details of foul and surface water disposal via planning conditions in any event of planning permission being granted.

Trees

7.60 Policy LP31 of the Local Plan states 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 and, in such cases, the proposal will be expected to make reference to and follow the guidance contained in the Council's A Tree Strategy for Huntingdonshire (2015) or successor documents. In addition, policy LP31 states that loss, threat or damage to any tree, woodland, hedge or hedgerow of visual, heritage or nature conservation value will only be acceptable where it is addressed firstly by seeking to avoid the impact, then to minimise the impact and finally where

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appropriate to include mitigation measures; or there are sound arboricultural reasons to support the proposal.

- 7.61 The application site contains two mature Sycamore trees which are afforded statutory protection due to their location within a Conservation Area and, in the case of one of them, a Tree Protection Order.
- 7.62 The two Sycamore trees are proposed to be retained as part of the proposed development and the application is accompanied by an Arboricultural Impact Assessment which provides an assessment of the impact of the proposed development on these trees. The TPO tree (which is located within the proposed rear garden of Plot 01 and referenced as 'T2' within the Arboricultural Impact Assessment) is the most impactful tree in respect of the proposed development, due to it being located closest to the proposed residential properties and due to its root protection area being most impacted.
- 7.63 The Council's Arboricultural Officer states that they have no significant objections to the proposed development, however they have raised reservations about the on-going relationship between residents and tree T2.
- 7.64 Most notably, the Arboricultural Officer considers that the proposed development would lead to high pressure for the removal and inappropriate pruning of tree T2 and that incursions within its root protection are only just within acceptable boundaries. The Arboricultural Officer also states that the application is not accompanied by a Method Statement as to how the surfacing around T2 is to be removed and replaced without damage to the rooting environment underneath, however this could be secured by a planning condition in any event of planning permission being granted.
- 7.65 Although the Arboricultural Officer's recommendations are acknowledged, in the absence of any significant objections from them and with consideration given to the details in the Arboricultural Impact Assessment indicating that the existing trees can be retained as part of the proposed development, it is considered that the proposed development adequately avoids and minimises impacts on trees, in accordance with policy LP31 of the Local Plan.

Biodiversity

- 7.66 Policy LP30 of the Local Plan states that a proposal will be required to demonstrate that all potential adverse impacts on biodiversity have been investigated, and that a proposal that is likely to have an impact on biodiversity will need to be accompanied by an appropriate appraisal identifying all individual and cumulative potential impacts on biodiversity, with any further research that is identified as necessary by the appraisal being carried out and submitted with the proposal. In addition, policy LP30 requires new development to ensure there is no net loss in biodiversity and provide a net gain where possible.
- 7.67 The application is accompanied by an Ecological Appraisal which recommended that presence/likely absence surveys would be required for bats, due to it establishing there to be a moderate potential for bat roosting in the Listed Building due to loose and missing clay roof tiles and potential access to the interior loft voids for bats. Further to the

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recommendations of the Ecological Appraisal, an Emergence and Activity Bat Survey which confirms that further surveys have shown the likely absence of bats with no emergences recorded.

- 7.68 It is therefore considered that the proposed development would have acceptable biodiversity impacts, in accordance with policy LP30 of the Local Plan.
- 7.69 In respect of Biodiversity Net Gain (BNG), the application is accompanied by a BNG Metric and BNG Report which indicate that the proposed development would result in a 11.84% net gain in habitats units and 24.74% net gain in hedgerow units on site. It is therefore considered that BNG could be secured by a planning condition in any event of planning permission being granted, in accordance with the requirements of Schedule 7A of the Town and Country Planning Act 1990.

Waste storage

- 7.70 Policy LP14 of the Local Plan states a proposal will be required to ensure adequate and accessible waste storage is provided, avoiding adverse impacts. In addition, the Huntingdonshire Design Guide SPD states that the location of bin collection points should be carefully considered to ensure ease of access and the amenity of nearby residents is not adversely affected; and that bin storage should be designed with sufficient capacity to accommodate the applicable containers, discreet when viewed from the public realm, protected from weather and animal interference, and designed to enable ease of access to bins on collection day.
- 7.71 The proposed development fails to demonstrate adequate and accessible waste storage arrangements could be achieved, with no bin storage and collection points being proposed to serve the proposed dwellings, contrary to policy LP14 of the Huntingdonshire Local Plan to 2036 and the Huntingdonshire Design Guide SPD.

Accessible and adaptable dwellings

- 7.72 Policy LP25 of the Local Plan requires proposals that include housing to meet the optional Building Regulation requirement M4(2)" Accessible and adaptable dwellings" unless it can be demonstrated that site specific factors make this unachievable. This could be secured by a planning condition in any event of planning permission being granted, however, any such condition would require flexibility for this requirement to be removed if it is demonstrated that it would result in an unacceptable level of harm to the Listed Building.

Water efficiency

- 7.73 Policy LP12 of the Local Plan requires proposals that include housing to comply with the optional building regulation for water efficiency, as set out in Approved Document G. This could be secured by a planning condition in any event of planning permission being granted.

Developer contributions (Community Infrastructure Levy)

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7.74 Policy SS3 of the Neighbourhood Plan states that new residential development will be delivered alongside necessary community facilities and services including improvements to existing schools, GP surgeries and dentist surgeries and/or the provision of new schools, GP surgeries and dentist surgeries within St Neots to ensure that the existing and new population have access to community facilities and services, school places, GPs and dentists.

7.75 The development will be Community Infrastructure Levy (CIL) liable in accordance with the Council's adopted charging schedule; CIL payments will cover footpaths and access, health, community facilities, libraries and lifelong learning and education.

Developer contributions (Wheeled bins)

7.76 Provision of wheeled bins can be secured by a Unilateral Undertaking, in accordance with the requirements of Policy LP4 of the Local Plan and the Developer Contribution SPD in this regard.

Conclusion and Planning Balance

7.77 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 the Council's housing requirement.

7.78 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).

7.79 As Huntingdonshire's Local Plan to 2036 (the Local Plan) 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. Paragraph 78 of the NPPF also requires provision of a buffer to ensure choice and competition in the market for land.

7.80 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.

7.81 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'.

7.82 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.

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7.83 The proposed development would bring the Listed Building back into use and provide an additional 9No. additional residential units towards the district's housing supply, within a highly sustainable settlement. In addition, the proposed development would contribute towards economic growth, including job creation, during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. In addition, the proposed development would have acceptable impacts in respect of highway safety and parking provision, biodiversity (including provision of Biodiversity Net Gain), sustainable construction and developer contributions. When considered cumulatively, these factors are afforded moderate weight in favour of the application.

7.84 However, the application of policies in the NPPF that protect designated heritage assets and areas at risk of flooding provide a strong reason for refusing the proposed development. In addition, the proposed development would fail to provide a high standard of amenity is provided for all users and occupiers of the proposed development and fails to demonstrate that adequate and accessible waste storage arrangements could be achieved. When considered cumulatively, these factors are afforded significant weight against the application and therefore, on balance, the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the NPPF taken as a whole. It is therefore considered that the proposed development fails to accord with the presumption in favour of sustainable development set out within paragraph 11 of the NPPF and the application is recommended for refusal.

8 RECOMMENDATION – REFUSE FOR THE FOLLOWING REASONS:

1. The application is not accompanied by sufficient information to enable the Local Planning Authority to make a full assessment of the impacts of the proposed development on the Listed Building. On the basis of the information accompanying the application, the proposed alterations and extension to the Listed Building, in addition to the removal of historic features and fabric which contribute to its significance and its architectural and historic interest, would result in harm to the character, appearance, setting and significance of the Listed Building and the Conservation Area. In addition, the proposed bungalows, car parking area and gardens would result in a cramped and contrived form and layout of development within the curtilage of the Listed Building and the Conservation Area; and the proposed bungalows, by virtue of their siting, scale and incoherent design, would appear unsympathetic to the Listed Building and the Conservation Area. For these reasons, the proposed development is not designed to a high quality that reinforces local distinctiveness, and it would result in less than substantial harm to the character, appearance, setting and significance of the Listed Building and the Conservation Area which would outweigh the benefits of the proposed development, contrary to Policy A3 of the St Neots Neighbourhood Plan (2016), policies LP11, LP12 and LP34 of the Huntingdonshire Local Plan to 2036, and the provisions of the National Planning Policy Framework.
2. The proposed development would result in the erection of new dwellings, and an extended car parking area to serve the proposed

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dwellings, located within Flood Zone 2. The proposed development fails to pass the sequential test and exception test for flood risk, contrary to policy 5 of the Huntingdonshire Local Plan to 2036, paragraph 174 of the NPPF and guidance contained within Section 4 of the Cambridgeshire Flood and Water SPD.

3. The proposed development would provide poor levels of privacy to the windows and gardens of Plots 08 and 09; a poor outlook from the bedroom window within the west elevation of Plot 08; and detrimental noise and light impacts to the bedroom and kitchen / living room windows within the east elevation of Plot 09. The proposed development would therefore fail to provide a high standard of amenity for future occupiers of the proposed development, contrary to policy LP14 of the Huntingdonshire Local Plan to 2036.
4. The proposed development fails to demonstrate that adequate and accessible waste storage arrangements could be achieved, with no bin storage and collection points being proposed to serve the proposed dwellings, contrary to policy LP14 of the Huntingdonshire Local Plan to 2036 and the Huntingdonshire Design Guide SPD (2017).

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

CONTACT OFFICER:

Enquiries about this report to **Richard Fitzjohn, Senior Development Management Officer**

richard.fitzjohn@huntingdonshire.gov.uk

Schedule of Planning Applications – 30th September 2025

No.	Reference	Development	SNTC Decision	Notes
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The following application/s are for listed building consent

S3	25/01713/LBC & 25/01712/FUL	OTAA St Neots Property Ltd 44 Huntingdon Street St Neots PE19 1DU Conversion of existing building into 7 residential units and erection of 2 bungalows with associated landscaping and drainage works.	SUPPORT	We consider the proposal would assimilate itself to the existing part of the town. Makes efficient use of its site.
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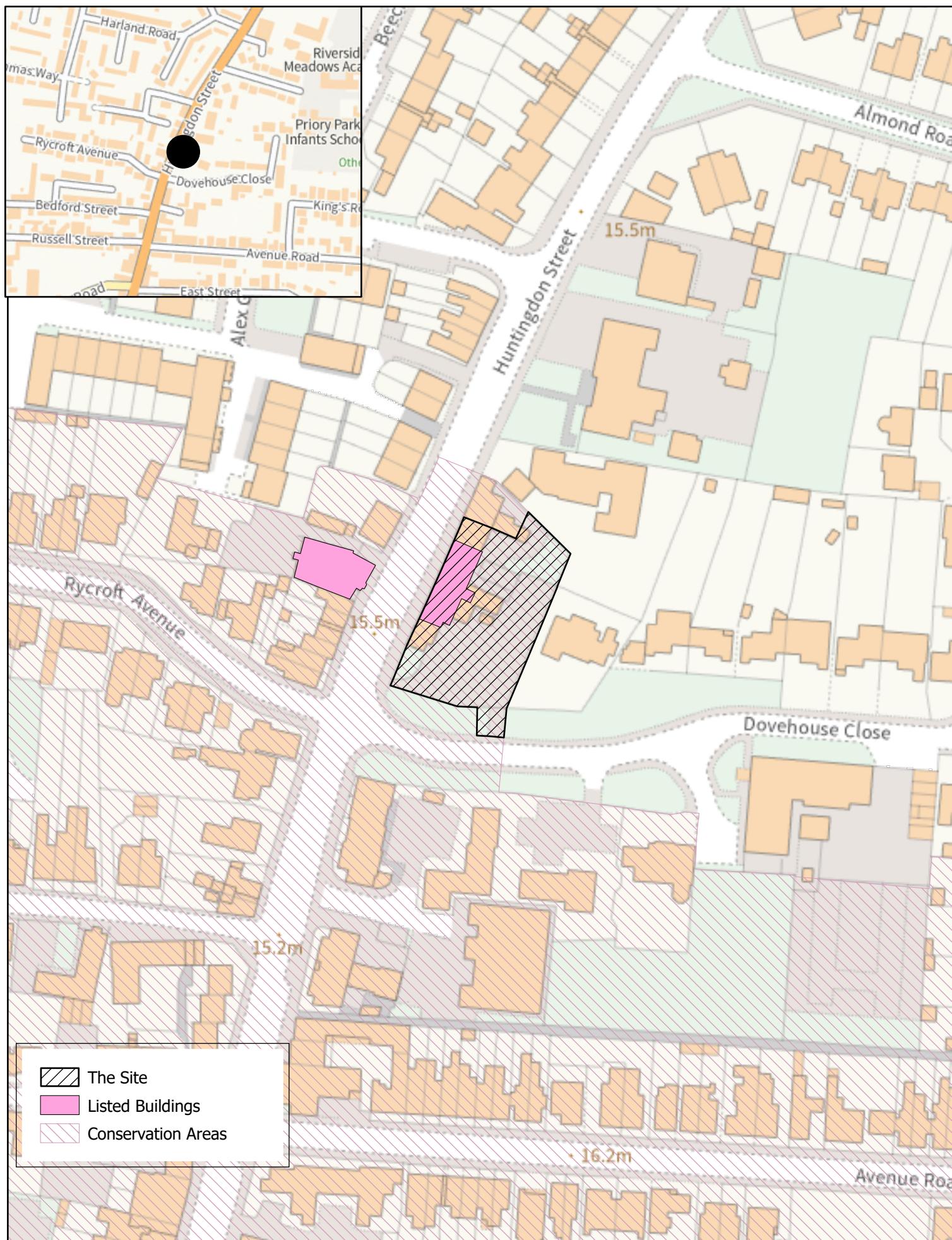
Development Management Committee

Application Ref: 25/01712/FUL



Scale = 1:1,250

Date Created: 11/02/2026



Location Plan

Site Address: R A F Association, 44, Huntingdon Street, St Neots, PE19 1DU

Date Produced: 09-Sep-2025

Scale: 1:1250 @A4





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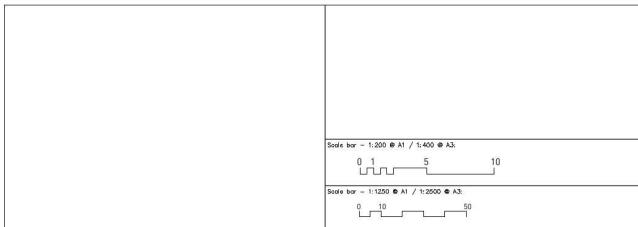
PROPOSED LOCATION PLAN - 1:1250 @ A1 / 1:2500 @ A3

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Any discrepancies shall be immediately
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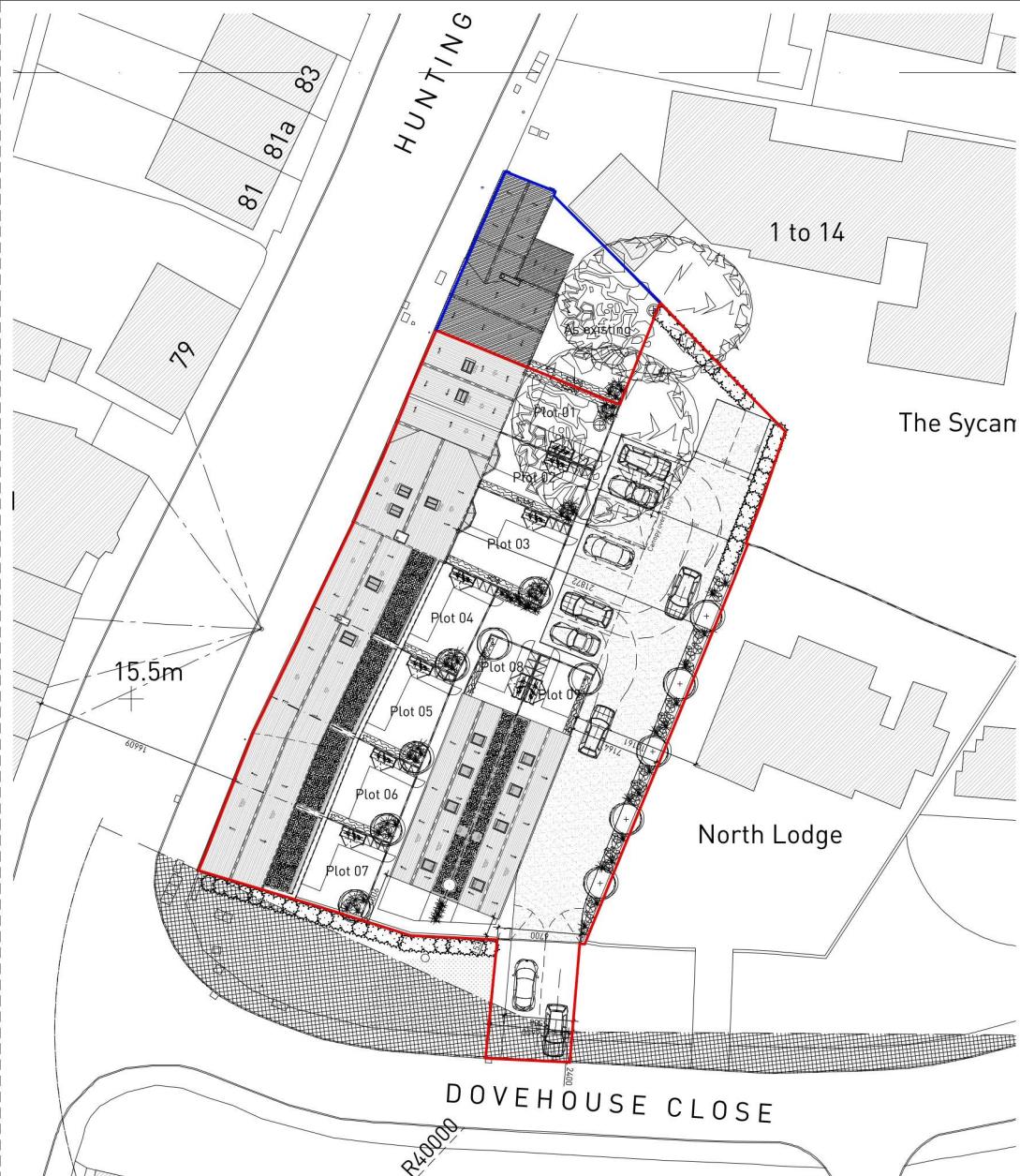
NOTES

1. ALL DIMENSIONS AND LEVELS ARE TO BE DETERMINED AND OR CHECKED BY THE CONTRACTOR OR SITE. SHOULD ANY DISCREPANCY BE IDENTIFIED BETWEEN THE DIMENSIONS, AND OR DETAILS DETERMINED ON SITE, AND THOSE SHOWN ON THE RELEVANT DRAWINGS, THE CONTRACTOR SHALL MAKE THE CORRECTION IMMEDIATELY AND HIS INSTRUCTIONS OBTAINED FROM THE COMMENCEMENT OF THE WORK.
2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN AND IMPLEMENTATION OF TEMPORARY WORKS, AND THE SAFETY AND STABILITY OF THE NEW WORKS AND ADJUSTMENTS TO EXISTING WORKS.
3. WHERE A PRODUCT IS SPECIFIED TO BE OBTAINED FROM A MANUFACTURER OR SUPPLIER, THE CONTRACTOR SHALL INSTALL THE PRODUCT IN ACCORDANCE WITH THE INSTRUCTIONS SUPPLIED BY THE MANUFACTURER. SHOULD THERE BE ANY VARIATION BETWEEN THE INSTRUCTIONS AND THE CONTRACTOR'S INSTRUCTIONS, THE CONTRACTOR'S INSTRUCTIONS

EXISTING STRUCTURE / BUILDING - SHADED GREY SOLID HATCH



PROPOSED SITE PLAN - 1:200 @ A1 / 1:400 @ A3



P05	08.09.2025	PLANNING ISSUE OF INFORMATION: Revised
P04	01.08.2025	PLANNING ISSUE OF INFORMATION: Revised
P03	26.04.2025	PLANNING ISSUE OF INFORMATION: Revised
P02	05.04.2025	PLANNING ISSUE OF INFORMATION
P01	23.05.2025	PLANNING ISSUE OF INFORMATION

Project
2508 - Residential Development
Client
OTAA St Neots Property Ltd
Location
RAFA Club, 44 Huntingdon St,
St Neots, Cambridgeshire

HUNTING

DOVE HOU

PROPOSED GROUND FLOOR PLAN - 1:100 @ A1 / 1:200 @ A3

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- 2 THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN AND IMPLEMENTATION OF ALL TEMPORARY SUPPORTS, STRENGTH AND STABILITY OF THE NEW WORK AND ADJACENT STRUCTURES DURING CONSTRUCTION.
- 3 WHERE A PRODUCT IS PURCHASED TO BE OBTAINED FROM A MANUFACTURER OR SUPPLIER, THE CONTRACTOR SHALL INSTALL THE PRODUCT IN ACCORDANCE WITH THE INSTRUCTIONS SUPPLIED BY THE MANUFACTURER. SHOULD THERE BE ANY VARIACTION BETWEEN THE INSTRUCTIONS AND THE CONTRACTOR'S OWN INSTRUCTIONS, THE CONTRACTOR'S OWN INSTRUCTIONS SHALL OVERIDE.

CONTINUOUS STRUCTURE, LIP BULDING - CHARGED SIREN SQUADRON

Sade bar = 1:100 ◉ A1 / 1:200 ◉ A2

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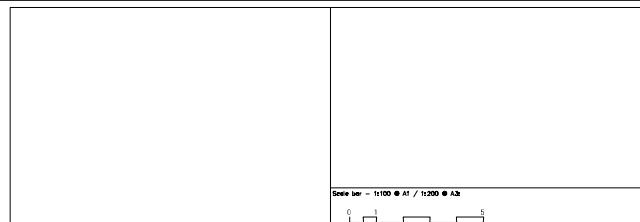
P04	01.08.2025	PLANNING ISSUE OF INFORMATION: Revised
P03	26.06.2025	PLANNING ISSUE OF INFORMATION: Revised
P02	05.06.2025	PLANNING ISSUE OF INFORMATION
P01	23.05.2025	PLANNING ISSUE OF INFORMATION
REVISIONS		

Project	2508 - Residential Development		
Client	OTAA St Neots Property Ltd		
Location	RAFA Club, 44 Huntingdon St, St Neots, Cambridgeshire		
Design Architect	Matt Johnson (MJD) (BDA) Bington House, 109 High Street, Huntingdon, Cambridgeshire, PE29 3TF, UK		
Mobile	+44 7775 796 155 Email / Web Info@devlinarchitects.com www.devlinarchitects.com Instagram LinkedIn		
Title PLANNING Proposed Ground Floor Plan			
Status	Stage 2-3	Code	1:100 @ A1
Drawn	SD	Checked	SD
Revised	P04	Date	23.05.2025
2508PL009 - P04			

HUNTING

DOVE HOU

PROPOSED FIRST FLOOR PLAN - 1:100 @ A1 / 1:200 @ A3



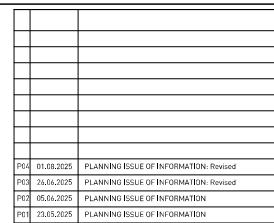
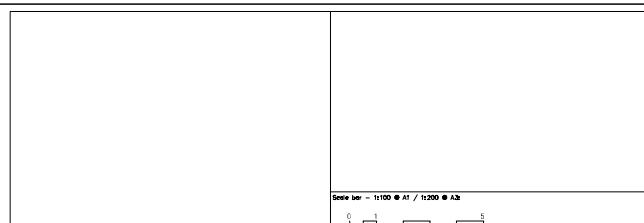
<p>6. Copyright, Devlin Architects, Ltd DO NOT make any photocopies of this site Any alterations to be made on site Are to be made by the Client Any alterations to be made by the Client will be immediately notified to the Architect in writing.</p> <p>NOTES</p> <p>1. ALL DIMENSIONS AND LEVELS ARE TO BE DETERMINED AND DETERMINED BY THE CONTRACTOR. THE CONTRACTOR IS TO BE RESPONSIBLE FOR THE ACCURACY OF THE DIMENSIONS AND LEVELS. THE CONTRACTOR IS TO BE RESPONSIBLE FOR THE ACCURACY OF THE RELATED DRAWINGS. THE ARCHITECT SHALL BE NOTIFIED IMMEDIATELY AND THE INSTRUCTIONS FOR THE CONTRACTOR SHALL BE FOLLOWED.</p> <p>2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN AND MANUFACTURE OF ALL ELEMENTS WORKS, AND THE MANUFACTURE AND STYLING OF THE NEW WORKS AND ADJACENT EXISTING WORKS.</p> <p>3. WHERE A PRODUCT SPECIFIED IS OBTAINED FROM A MANUFACTURER OR SUPPLIER, THE CONTRACTOR SHALL SOURCE THE PRODUCT IN ACCORDANCE WITH THE INSTRUCTIONS PROVIDED BY THE MANUFACTURER OR SUPPLIER. THE CONTRACTOR SHALL NOT ALTER THE WORK SPECIFIED ON THE DRAWINGS AND THE MANUFACTURER'S INSTRUCTIONS. THE CONTRACTOR SHALL NOT ALTER THE DRAWINGS AND THE MANUFACTURER'S INSTRUCTIONS.</p> <p>4. THE CONTRACTOR SHALL NOT ALTER THE DRAWINGS AND THE MANUFACTURER'S INSTRUCTIONS.</p>	 <p>devlin architects</p>
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P04	01.01.2025	PLANNING ISSUE OF INFORMATION: Revised
P05	15.06.2025	PLANNING ISSUE OF INFORMATION: Revised
P06	05.06.2025	PLANNING ISSUE OF INFORMATION
P07	23.05.2025	PLANNING ISSUE OF INFORMATION

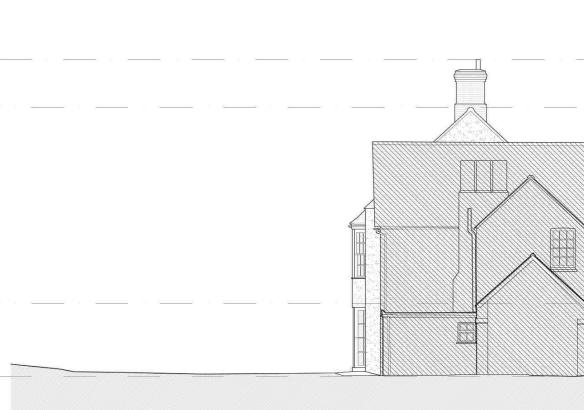
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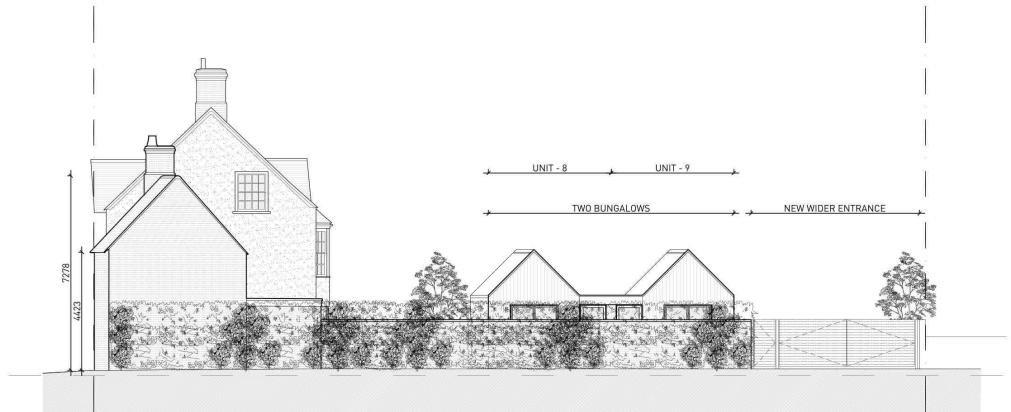
PROPOSED SECOND FLOOR PLAN - 1:100 @ A1 / 1:200 @ A3



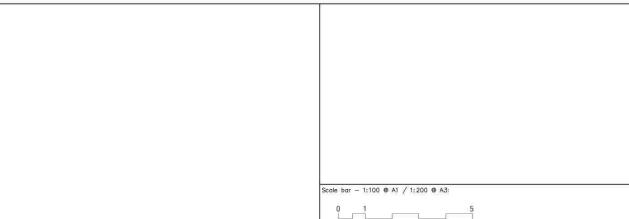
Project	2508 - Residential Development		
Client	OTAA St Neots Property Ltd		
Location	RAFA Club, 44 Huntingdon St, St Neots, Cambridgeshire		
Architect	devlin architects		
Address	Huntingdon Cambridge Cambridgeshire PE29 2LT, UK	Phone	+44 7755 796 103
Email	info@devlinarchitects.com	Website	www.devlinarchitects.com
Designers	devlin architects		
Planning	PLANNING Proposed Second Floor Plan		
Status	Stage 2-3	Scale	1:100 @ A1
Drawn	SD	Checked	SD
Revised	P04	Date	23.05.2025



PROPOSED NORTH ELEVATION - FACING THE NEIGHBOUR - 1:100 @ A1 / 1:200 @ A3



PROPOSED SOUTH ELEVATION - FACING THE STREET ELEVATION - 1:100 @ A1 / 1:200 @ A3



PROPOSED SOUTH ELEVATION - STREET ELEVATION OUTSIDE OF WALL - 1:100 @ A1 / 1:200 @ A3



Project 2508 - Residential Development Client OTAA St Neots Property Ltd Location RAFA Club, 44 Huntingdon St, St Neots, Cambridgeshire	Devlin Architects Ltd (2020) 109 High Street, Huntingdon, Cambridgeshire PE29 5TF, UK	Mobile +44 7775 796 165 Email/ Website www.devlinarchitects.com Instagram @devlinarchitects
Title PLANNING Proposed North & South Elevations	Stage Stage 2-3	Scale 1:100 @ A1
Drawn DJS	Checked SD	
Revision P02	Date 23.05.2025	

2508 PL014 - P02



PROPOSED WEST ELEVATION - FACING THE STREET ELEVATION - 1:100 @ A1 / 1:200 @ A3



PROPOSED EAST ELEVATION - FACING THE REAR LANDSCAPING - 1:100 @ A1 / 1:200 @ A3

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Do not scale from this drawing
All dimensions and levels are site
Any discrepancies shall be immediately
notified to the Architect in writing:

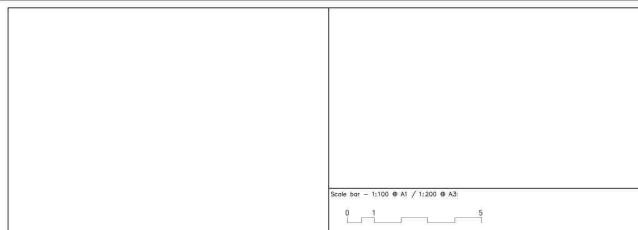
NOTE

1. ALL DIMENSIONS AND LEVELS ARE TO BE DETERMINED AND OR CHECKED BY THE CONTRACTOR AND NOT BY THE ARCHITECT. THE CONTRACTOR IS RESPONSIBLE FOR ALL DIMENSIONS, AND OR DETAILS DETERMINED ON SITE, AND THOSE SHOWN ON THE RELEVANT DRAWINGS, WHICH ARE TO BE CHECKED BY THE ARCHITECT AND HIS INSTRUCTIONS OBTAINED PRIOR TO THE COMMENCEMENT OF THE WORK.

2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN AND IMPLEMENTATION OF ALL TRADES WORKS, INCLUDING THE PREPARATION, ERECTING, AND FINISHING OF THE NEW WORK AND RELATED STRUCTURES DURING CONSTRUCTION.

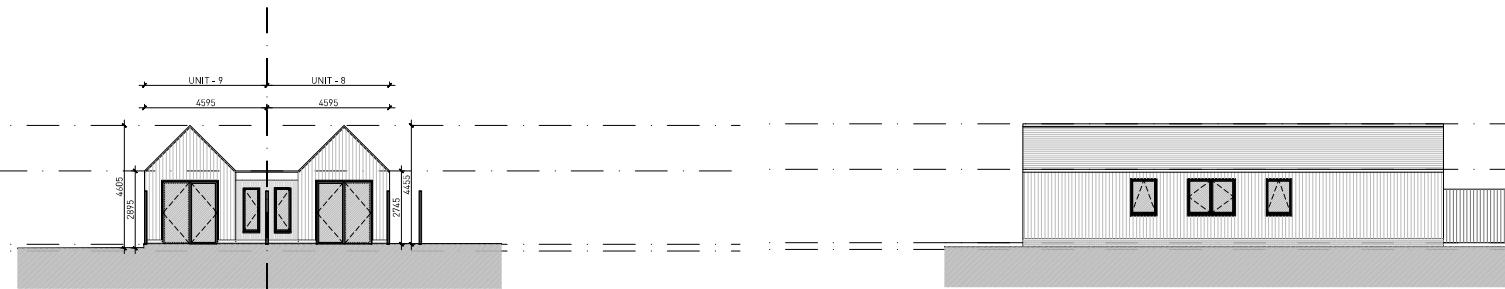
3. WHERE A PRODUCT IS SPECIFIED TO BE OBTAINED FROM A MANUFACTURER OR SUPPLIER, THE CONTRACTOR SHALL PURCHASE THE PRODUCT FROM THE MANUFACTURER OR SUPPLIER SUPPLIED BY THE MANUFACTURER. SHOULD THERE BE ANY VARIATION BETWEEN THE WORK AND THE PRODUCT, THE CONTRACTOR SHALL NOTIFY THE MANUFACTURER IMMEDIATELY. THE CONTRACTOR SHALL REFER THE MATTER TO THE ARCHITECT FOR INSTRUCTION BEFORE PROCEEDING.

EXISTING STRUCTURE / BUILDING - SHADING GREY SOLID HATCH



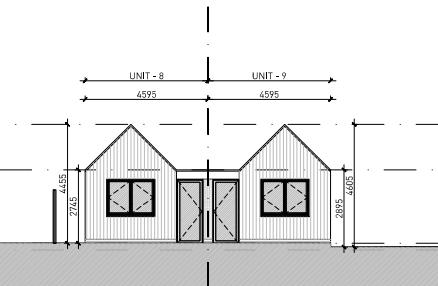
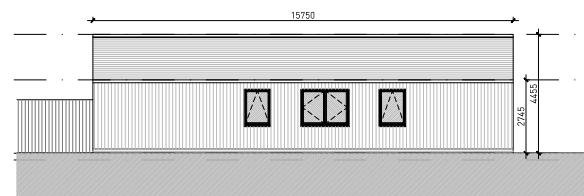
Project	2508 - Residential Development	Mobile
Client	OTAA St Neots Property Ltd	+44 7775 796 165
Location	RAFA Club, 44 Huntingdon St, St Neots, Cambridgeshire	Email: info@devlinarchitects.com www.devlinarchitects.com PC29 5TF, UK Instagram: @devlinarchitects
Title	PLANNING Proposed East & West Elevations	
Status	Stage 2-3	Scale
Brown	DS	1:100 @ A1
Revision	P01	Checked SD
		Date 23.05.2025

2508 PLO13 - P01

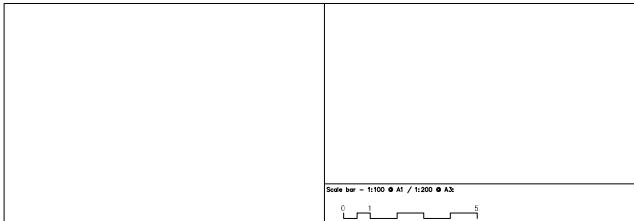


PROPOSED NORTH ELEVATION - FACING THE LANDSCAPING - 1:100 @ A1 / 1:200 @ A3

PROPOSED EAST ELEVATION - FACING THE DRIVEWAY - 1:100 @ A1 / 1:200 @ A3



PROPOSED WEST ELEVATION - FACING THE STREET - 1:100 @ A1 / 1:200 @ A3



PROPOSED SOUTH ELEVATION - FACING THE LANDSCAPING - 1:100 @ A1 / 1:200 @ A3

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	All dimensions and levels are to be determined and checked by the contractor and the architect shall not be liable for any errors or omissions, and no detailed reference is made, and those shown in the relevant drawings, to the exact position of any structural, technical and/or services elements prior to the commencement of the work.
1	THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN AND IMPLEMENTATION OF ALL SERVICES, INCLUDING BUT NOT LIMITED TO, PLUMBING, ELECTRICAL, GAS, AND ROOFING STRUCTURES DURING CONSTRUCTION.
2	WHERE A PRODUCT IS SPECIFIED TO BE SUPPLIED AND NOT MANUFACTURED OR SUPPLIED BY THE CONTRACTOR, THE CONTRACTOR SHALL BE LIABLE FOR THE PRODUCT AS SUPPLIED BY THE MANUFACTURER, SHOULD THERE BE ANY VARIATION DUE TO THE WORK OF THE CONTRACTOR, THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE COST OF THE CONTRACTOR'S WORK TO CORRECT THE MATTER TO THE APPROVAL FOR INSPECTION BEFORE PROCEEDING.
3	EXISTING STRUCTURES / BUILDINGS / SHARED GROUNDS / PATHS

Scale bar - 1:100 @ A1 / 1:200 @ A3

0 1 2 3 4 5

Project	2508 - Residential Development	Architectural Drawing	Architect
Client	OTAA St Neots Property Ltd	Site Address	103 High Street Milton Keynes Bedfordshire MK10 1JG England PE29 5TF, UK
Location	RAFA Club, 44 Huntingdon St, St Neots, Cambridgeshire	Site Reference	
		Client Contact	Mr. [REDACTED] +44 7775 795 155 Email: [REDACTED] Website: [REDACTED] Designers: [REDACTED] Architects: [REDACTED]
Title	PLANNING Proposed Bungalow Elevations	Scale	1:100 @ A1
Status	Stage 2-3	Drawn	DS
Drawn		Checked	SD
Revision	P03	Date	23.05.2025
		25.08.P.L.015-P.03	