

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

22 October 2024

Attn: Laura Fisher, Case Officer

BY EMAIL ONLY: developmentcontrol@huntingdonshire.gov.uk

Dear Sirs

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

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

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

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

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

LVA review

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

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

The Site

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

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

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

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

Planning policy

NPPF 180

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

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

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

The Local Plan

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

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

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

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

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

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

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

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

The Neighbourhood Plan

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

Policy HWNP3 – Anti-coalescence

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

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

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

Development proposals should:

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

Representations

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

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

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

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

19. Despite this, the revisions which comprise the current scheme do not adequately address a number of important issues relevant to the 2022 updated Huntingdonshire Landscape and Townscape Assessment. These are also not addressed in the 2024 LVA.
20. Mr Radmall's First LVA Review highlighted a number of serious flaws with the Applicant's 2023 LVA and its findings, including:
 - (i) Failing to assess the character of the site by considering its landscape/ perceptual attributes as receptors;
 - (ii) Failing to assess the site's representativeness or and contribution to published character types/ areas
 - (iii) Failing to assess the site's landscape components and perceptual attributes at a local level, including with reference to the adjoining conservation areas.
21. On this basis Mr Radmall concluded that the 2023 LVA played down the severity of effects, particularly those on the most sensitive visual receptors and, that smaller-scale variations at a local level may have been overlooked. These serious failures have not been fully rectified as recorded in Mr Radmall's Update Review: -

"3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered."
22. Because the 2024 LVA fails to assess the Development's effects on site character, including its component landscape/perceptual attributes, and does not explicitly assess the site's representativeness of/contribution to the published LCAs⁶ (especially the HLT SPD 2022, which requires that development proposals should enrich the area by reinforcing its special qualities and acknowledging its distinct local character), it does not demonstrate that the Development does not conflict with the Local Plan policies identified above, or Paragraph 180(b) of the NPPF.
23. Additionally, the 2024 LVA failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the Site (Radmall Update Review paras 2.10-2.13). The 2024 LVA also fails to consider whether the Site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB (Radmall Update Review 2.14-2.17). These failures mean that it is not demonstrated that the development complies with Paragraph 180(a) of the NPPF.
24. As explained in Mr Radmall's June 2023 Separation Report, the Development would encroach into open countryside and have a further urbanising influence on the locality, contrary to Neighbourhood Plan Policy HWNP1 – Houghton & Wyton built up area, Local Plan Policy LP 10 – The Countryside, SI 1 (g) and Paragraph 174(b) of the NPPF. None of these concerns have been addressed as recorded in the Update Review:

⁶ LVA Review, section 5.

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

Anti-coalescence

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

Flawed application of 10% tolerance (LP text D8⁷)

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

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

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

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

37. The second change that the Parish Council has long requested is regarding the footprint of the development to reduce the spread of the eastern edge so as to reduce the overall developed area to provide a landscape buffer which separates the parish from St. Ives. This has not changed to reduce the loss of spatial separation as explained in the Peter Radmall report.
38. These changes are economically viable. FOI correspondence with Homes England confirms that there is no commercial necessity for the proposed quantum of housing on this Site, the last parcel of the SI 1 Allocation in the Local Plan 2019. FOI references RF13582 and RF113408 reveal that the total Homes England site was valued at £7.2m, with Houghton Grange Phase 1/Morris Homes sold for 4.6m, hence leaving a residual value for the Site of £2.6m.
39. It has not been possible to access the planning portal to review updated information from the County Council on Highways. The issues occurred on 22 October and have been reported to Development Control. Once we are able to review the new information we will write separately if necessary.

Conclusion

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

Yours faithfully



RICHARD BUXTON SOLICITORS