Planning Statement Addendum

Land East of Houghton Hill Farm, Houghton Road, St Ives

November 2026

Bellway Strategic Land

Turley

Contents

1.	Introduction	3
2.	Response to Consultation Comments	6
3.	Updated Planning Assessment	9
4.	Planning Balance	17
Appendix 1: Consultation Response Summary		21
Appendix 2: List of Application Documents		24



Client

Bellway Homes Limited

Our reference

01170

November 2026

1. Introduction

1.1 This Planning Statement Addendum has been prepared by Turley on behalf of Bellway Homes Limited and the Landowners (The Trustees of the EJ and BH Smith 2007 Discretionary Settlement and Mr Smith), hereafter referred to as 'Bellway', in support of outline planning application 25/00616/OUT at Land East of Houghton Hill Farm, Houghton Road, St Ives ('the site').

1.2 The application, submitted on 28 March 2025 and validated on 15 April 2025, seeks outline permission with all matters reserved except means of access. Following amendments submitted in February 2026, the description is:

"Outline planning (with all matters reserved except for means of site access) for the erection of up to 285 dwellings, provision of new access and emergency access, internal roads and footpaths, public open space and landscaping, surface water attenuation and associated infrastructure."

1.3 This Addendum should be read alongside the March 2025 Planning Statement, the February 2026 covering letter summarising the amendments to the application and the documents submitted with the final November 2026 amendments. It updates the assessment only where circumstances, consultation responses or the proposals have changed.

1.4 The final amendments respond principally to continuing engagement with Cambridgeshire County Council as Local Highway Authority concerning the detailed site-access arrangement and the scope, safety and deliverability of off-site highway and sustainable-transport measures. The technical basis is set out in a Transport Assessment Addendum.

Purpose and structure

1.5 This Addendum:

- Summarises the evolution of the application;
- Provides a concise response to consultation;
- Considers the emerging allocation of the site;
- Updates the assessment of landscape, highways and other technical matters;
- Revises the draft section 106 heads of terms; and
- Sets out the decision-making balance under the August 2026 NPPF, including policies S5(1)(j) and S5(4), with consideration of the weight to be afforded key policies within the Development Plan (with reference to NPPF Annex A).

Summary of amendments

1.6 The February 2026 amendments:

- Reduced the proposal from 295 to 285 dwellings;
- Removed the previously proposed roundabout at the A1123/Sawtry Way junction;
- Introduced a ghost-island priority access from Houghton Road and a separate emergency access;
- Safeguarded land for a potential future signalised A1123/Sawtry Way junction;
- Strengthened the east–west active travel route, including a 5m corridor through the site towards One Leisure St Ives Outdoor;
- Introduced a pedestrian crossing on Houghton Road;
- Set built form farther back from Houghton Road;
- Reduced heights to 1.5 storeys in the south-western corner; and
- Updated the Parameter Plan, Illustrative Masterplan, Design and Access Statement, Transport Assessment, Travel Plan, LVIA, Green Infrastructure Statement and heritage evidence.

1.7 Beyond the February 2026 amendments, updates were made as follows:

- March 2026 – submission of an Archaeological Evaluation Report following trial trenching.
- April 2026 – further amendments to the LVIA, alongside provision of a Green Infrastructure Plan, in response to Landscape comments.
- June 2026 – amendments to Transport Assessment, access plan, Parameter Plan and Green Infrastructure Plan; the changes responded to comments from the Highway Authority, and updates to plans also incorporated refinements to ensure the design objectives can be secured e.g. the Green Infrastructure Plan in response to Natural England comments.

1.8 The final amendments proposed now (November 2026) incorporate a comprehensive Transport Assessment, as well as a refinement to the access drawing to move the 5m-wide active travel link slightly further north. This responds to HDC Urban Design comments and ensures that a minimum 3m-wide planting zone is provided to the north of the land adjacent to Houghton Road that is safeguarded for potential highway improvements to be delivered by the Highway Authority at a later date, as part of the

A141 and St Ives Transport Improvement Scheme. The other plans are updated for consistency with this. The amended submission comprises the following:

- Parameter Plan (reference 603 P05 Rev G)
- Green Infrastructure Plan (reference 603 P04)
- Illustrative Masterplan (reference 603 P06 Rev E)
- Proposed Access Arrangements Ghost Island Plan (reference 23376_03_020_11.2 Rev G)
- Highways Response Report (reference 23376-TRAN-0809 Rev B)
- This Planning Statement Addendum
- Covering letter (November 2026)

1.9 A full list of application documents is provided at **Appendix 2**.

1.10 The revised scheme continues to provide policy-compliant affordable housing, substantial public open space, active-travel links, sustainable drainage and biodiversity net gain materially above the statutory minimum.

2. Response to Consultation Comments

2.1 The table below provides a summary of the matters raised by consultees since the application was submitted, and a response to the main issues.

2.2 **Appendix 1** provides further detail on the response to specific consultee comments.

Theme	Consultation position	Applicant response / status
Highways and active travel	CCC accepts the principle of the site access, subject to minor matters, but has sought further work on modelling, safety and deliverability of off-site measures. Active Travel England now recommends approval subject to conditions and/or obligations. National Highways has no objection.	The TA Addendum responds comprehensively to the matters raised by CCC. The final package comprises an acceptable ghost-island access arrangement, revised frontage corridor, active-travel connection towards St Ives Outdoor Centre, targeted safety improvements, sustainable-travel and public-transport measures, and a robust delivery mechanism through planning obligations and section 278 agreements. The assessment demonstrates that the proposal would not result in an unacceptable highway-safety impact or a severe residual cumulative transport impact. See paragraphs 3.10 below.
Landscape, design and heritage	Comments on the original application raised concern with the urbanising effect of the roundabout. Following February 2026 amendments, subsequent comments from the landscape officer identify a localised moderate/major effect initially, reducing to moderate adverse as planting establishes. The urban design and conservation officers seek a robust Houghton Road landscape frontage and sufficient	The February 2026 amendments removed the originally proposed roundabout, reduced development and building heights in the most sensitive areas including the south west corner. The parameters include increased setbacks and planting, and a new pedestrian crossing is proposed on Houghton Road, aligned with the tree-lined boulevard delivered as part of the adjacent Houghton Grange development.

	offset to the listed Gate Lodges to the south. Trial trenching was requested by the Council's archaeological advisor.	The November 2026 changes ensure consistency between the evolving access plans and the proposed landscaping, ensuring greater certainty over the delivery of landscaping along Houghton Lane in the context of the safeguarded land. Localised residual effects are acknowledged and weighed in the planning balance. Detailed layout and landscaping remain reserved. Trial trenching has been undertaken and the findings submitted and agreed.
Ecology and green infrastructure	Following February 2026 amendments, Natural England has no objection. The ecology officer confirms sufficient information is available and raises no objection subject to conditions and long-term management.	Noted. The Green Infrastructure Statement provides extensive on-site open space, a 1.46km continuous recreational route, strengthened connections and substantial biodiversity net gain. Mitigation, management and monitoring can be secured, including through approval of the Parameter Plan and Green Infrastructure Strategy Plan.
Flood risk, drainage and utilities	The Lead Local Flood Authority and Anglian Water raise no objection.	Noted. Surface water can be attenuated to 14.1 l/s using SuDS. Wastewater treatment and network capacity are available, subject to normal connection and asset-protection requirements.
Housing, health, education and community infrastructure	The housing officer raises no objection and seeks the affordable mix, type and tenure in the section 106 agreement. Education, libraries, sports, healthcare and waste requests have been quantified.	Noted. The Applicant offers policy-compliant affordable housing and the necessary planning obligations.

Other technical matters	Arboriculture, environmental health, fire, police and emergency-service matters can be addressed by conditions, reserved matters and Building Regulations.	The Applicant notes that no technical consultee identifies an in-principle constraint incapable of resolution via condition.

3. Updated Planning Assessment

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires determination in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan

3.2 The adopted Huntingdonshire Local Plan to 2036 remains the starting point; the relevant policies are set out in the original Planning Statement and are not repeated here.

Emerging Local Plan

3.3 Since submission, the site and adjoining land to the north have been identified in the Pre-Submission Local Plan to 2046 as draft allocation **St Ives 1: North of Houghton Road**, for about 350 homes. This was included in the Regulation 18 version of the Plan consulted on in December 2025. The Regulation 19 consultation ran from 16 September to 28 October 2026 with the draft allocation retained. Although the emerging plan is not yet adopted and the allocation attracts limited weight proportionate to its stage, unresolved objections and consistency with national policy, its inclusion is a clear and important indication that the Council considers this direction of growth suitable as part of its future spatial strategy. It also reflects the site's sustainable location and its unconstrained nature.

3.4 The application site forms the southern, infrastructure-connected part of that wider allocation. Granting outline permission would not prejudice comprehensive delivery: the parameter plans safeguard strategic connections and land for future highway infrastructure, while the application can provide early homes and infrastructure consistent with the emerging allocation.

NPPF (2026)

3.5 The NPPF introduces national decision-making policies (NDMP). The following policies are relevant to the determination of this application:

- S5: Principle of development outside settlements
- HO7 and HO8: Meeting housing need and providing affordable homes
- DM4: Emerging development plan proposals
- CC2 and CC3: Climate-change mitigation and adaptation
- L3, DP3 and DP4: Density and well-designed places

- TR3, TR4 and TR6: Sustainable location, street design and transport effects
- F4 and F8: Assessing flood risk for decision-making; sustainable drainage
- N2 and N3: Improving the natural environment; Trees in new development
- HE4, HE5 and HE6: Heritage
- DM3: Determining development proposals

3.6 Annex A of the NPPF states that existing Development Plan policies that are materially inconsistent with national decision-making policies should be given very limited weight. The exercise is policy-specific rather than a conclusion that the plan as a whole is out of date.

3.7 Local Plan Policies LP2, LP7 and LP10 (in part) should attract very limited weight insofar as their combined effect operates as a near-absolute restraint on otherwise sustainable housing immediately adjoining St Ives, inconsistent with NPPF policy S5(1)(j). The strategy was also calibrated to a materially lower housing requirement and is not delivering a five-year supply in line with the local housing need established by the standard method.

3.8 Policy LP10's objectives relating to intrinsic countryside character, agricultural land and amenity remain relevant and should be applied to the actual effects. What attracts very limited weight is any blanket locational prohibition detached from the balancing exercise required by S5. Likewise, LP2's direction of growth to the Spatial Planning Areas remains consistent and supportive in principle; its outdated quantum and restrictive mechanism (applied through LP7) attracts very limited weight.

3.9 Policies addressing design, amenity, drainage, sustainable travel, affordable housing, biodiversity, trees, heritage and infrastructure are broadly consistent with the corresponding national decision-making policies and should continue to receive appropriate weight. As set out below, the proposal accords with those policies (and the relevant NDMPs), subject to conditions and obligations.

Highways and transportation

3.10 The site is on the edge of one of the District's most sustainable settlements, close to services, schools, leisure facilities and the Guided Busway. The proposals create a continuous active-travel corridor along and through the site and a connection towards One Leisure St Ives Outdoor Centre (OLSIO) and Hill Rise.

3.11 CCC has confirmed that the principle of the proposed access arrangements is acceptable. Through an extensive process of technical engagement, the Transport Assessment and subsequent Addendum have reviewed the operation of the local highway network, refined the access design, updated junction modelling and identified

a package of mitigation measures. The final discussions have focused principally on the operation of specific junctions, the deliverability of off-site measures, the balance between capacity interventions and sustainable-transport initiatives, and the mechanisms through which mitigation will be secured and delivered. National Highways raises no objection to the development and Active Travel England recommends approval subject to conditions and obligations.

3.12 The Transport Assessment Addendum demonstrates that the transport impacts of the proposed development can be appropriately mitigated through a coordinated package of highway, active-travel and public-transport measures. The revised proposals provide a ghost-island priority junction on Houghton Road, a separate emergency access, a continuous frontage active-travel corridor and an enhanced connection towards OLSIO. The amendments also incorporate targeted off-site highway and road-safety measures, improvements for pedestrians and cyclists, Travel Plan initiatives and financial contributions towards wider sustainable-transport improvements, including support for Busway infrastructure.

3.13 Updated modelling and junction assessments have been undertaken in response to comments from the Highway Authority. While parts of the wider network are forecast to experience congestion as a result of background traffic growth, the assessment demonstrates that these conditions largely arise in the future baseline position and are not created by the development. The development's contribution to forecast queueing and delay is comparatively limited and, following mitigation, does not materially alter the overall operation of the network. The evidence indicates that the principal constraints affecting certain junctions are existing strategic network conditions rather than impacts arising from the proposed development itself.

3.14 The Addendum concludes that the development would not give rise to an unacceptable impact on highway safety and would not result in a severe residual cumulative impact on the operation of the transport network. The proposed mitigation package is deliverable through a combination of planning obligations, section 278 agreements, Travel Plan commitments and future technical approvals. Taken together, the evidence demonstrates compliance with NPPF Policies TR3, TR4 and TR6 and confirms that the site represents a sustainable location for growth, capable of being served by appropriate transport infrastructure and travel choices.

Design and Landscape

3.15 An LVIA has been submitted and updated in February 2026 in response to consultee comments. The site is not within a nationally or locally designated landscape and is assessed as an urban-fringe arable field of low landscape value, with medium sensitivity at site and immediate-context level. Development would necessarily change its character from agricultural land to a residential neighbourhood. The LVIA identifies a permanent major adverse effect on the character of the site itself, reflecting the very high magnitude of change inherent in developing a greenfield site; this should not be

conflated with effects on the wider landscape. Effects on the host Central Claylands and Western Claylands character areas are substantially lower – moderate/minor adverse and minor adverse respectively – because the site forms a very small part of those extensive character areas. Visual effects are likewise geographically contained: the principal year-1 effects occur in close views from Houghton Road/Houghton Hill Road and in views from the western public footpath, with effects reducing as structural planting establishes, including from major/moderate to moderate at viewpoints 6 and 7 and from major to major/moderate at viewpoints 1 and 12. There would be no effect from viewpoint 9 and only moderate/minor or lesser effects at several more distant receptors. The assessment must be read with the embedded mitigation and design response in the Parameter Plan and Green Infrastructure Strategy, supported by the Illustrative Masterplan and Design and Access Statement, including removal of the south-western roundabout, the 1.5-storey limit in the south-western parcel, retention and reinforcement of boundaries, and the generous treed western landscape buffer.

3.16 The proposal adopts a design-led density and landscape strategy consistent with NPPF policies DP3 and L3, adopted Local Plan Policies LP11, LP12, LP14 and LP31, and the Huntingdonshire Design Guide SPD (2017), insofar as those policies and guidance remain consistent with the NPPF. Density will be confirmed through reserved matters, but the currently indicated developable residential area would result in an average density of approximately 34 dwellings per hectare. That is an efficient use of land in a sustainable edge-of-St Ives location, while allowing scale to reduce towards the more sensitive south-western corner. In that location, the parameters limit development to lower heights and provide a softer edge opposite the Gate Lodges and Houghton Grange frontage, creating an appropriate transition between the town, the Houghton Road corridor and the more rural land to the west.

3.17 The western boundary is treated as a major structural landscape edge. This is necessary both to provide a positive settlement edge and to maintain a clear landscape transition to the countryside west of the site, thereby responding to concerns around perceived coalescence and the wider approach to St Ives. This approach is consistent with LP11's requirement for context-responsive design, LP12's requirement for integration with landscape and streets, LP31's protection and enhancement of trees, woodland, hedges and hedgerows, and the Design Guide SPD's emphasis on landscape-led edge conditions and locally distinctive streets and spaces. In addition, it provides significant publicly accessible open space as part of a 1.46km continuous recreational route around the site.

3.18 The Houghton Road frontage has been revised to respond to the Urban Design Officer's comments that the active-travel corridor, A141 safeguarded land and highway works should not dominate the landscape edge. The final arrangement provides for a stronger frontage landscape treatment and a coordinated corridor within which the active-travel route, visibility requirements, replacement hedgerow/tree planting and land safeguarded for strategic highway improvements can be reconciled. The detailed alignment, verge widths, planting typologies and boundary treatments can be

controlled through reserved matters, highway technical approval and the proportionate Design Code, in consultation with the Council and highway authority. Particular attention will be given to the key south-western gateway and the landscape corridor along the southern boundary, where land is safeguarded for strategic highway improvements to be delivered by the highway authority.

3.19 The parameters also allow a good level of amenity to be secured for future residents, consistent with LP14 and the NPPF's good-design policies. Development is separated from commercial uses to the west by the structural landscape edge and internal layout controls, and the detailed scheme will address the relationship with Houghton Road through orientation, separation, acoustic design, landscaping and boundary treatment. The submitted acoustic and environmental evidence demonstrates that acceptable internal and external amenity can be achieved, with detailed mitigation capable of being secured by condition and refined at reserved matters stage.

3.20 The majority of the Urban Design Officer's remaining concerns relate to matters of detailed design rather than the acceptability of the outline parameters: precise parcel edges, street typologies, tree-lined primary streets, frontage setbacks, height transitions, private-drive arrangements, pocket parks, SuDS treatment, play and open-space design, and detailed planting widths. Bellway is committed to preparing, submitting and agreeing a proportionate Design Code before reserved matters are approved. That Design Code will address density ranges, character areas, height strategy, building typologies, street sections, active-travel corridors, gateway design, landscape buffers, southern-frontage treatment, green-infrastructure widths, lighting, boundary treatments, noise-response principles and design-code compliance. On that basis, the outline scheme provides an acceptable and policy-compliant framework for detailed design to be resolved through reserved matters.

Heritage

3.21 The Council's Conservation Officer identifies less-than-substantial harm to the significance of the Grade II listed East and West Lodges to the south of the site, principally through change to their setting and the loss of the site as a neutral, rural backdrop when experienced from Houghton Road. The Officer considers that the main effect would be on the setting of the Lodges at the entrance to Houghton Grange and remains concerned that the new pedestrian crossing, works to Houghton Road and the realignment of the southern boundary hedge would introduce additional urbanising features and reduce open space and planting opposite the Lodges. The Officer nevertheless acknowledges that the amendments represent a positive improvement and lessen the harm previously identified.

3.22 That conclusion should be considered alongside the December 2025 EDP heritage response and the submitted Archaeological and Heritage Assessment. EDP explains that the principal significance of Houghton Grange derives from its architectural and historic interest, while the setting contribution is focused on the surviving former

parkland, the tree-lined avenue, the Gate Lodges and their connection with Houghton Road. The site lies beyond Houghton Road and outside that former parkland; only a narrow, distant glimpse of its southern hedgerow is available from the avenue. The Lodges' historic function remains legible through their distinctive form, close relationship with the road, their facing entrances and their alignment with the avenue and Grange. This context is also informed by the modern housing already introduced within the former parkland, where the relationship between the Grange, Lodges, avenue and Houghton Road was deliberately retained.

3.23 The amendments submitted in February 2026 materially reduce the potential effect. The south-western roundabout and associated infrastructure have been removed; built development opposite the Lodges is set at least approximately 30m north of Houghton Road and farther back than on the earlier masterplan; heights are reduced to 1.5 storeys in the south-western corner; housing is arranged away from the visual axis of the avenue; and verges, paths and layered landscape planting provide an intervening buffer. The new junction is approximately 70m east of the Lodges, on the opposite side of Houghton Road. Although the junction and crossing would be noticeable changes, the Lodges would remain the only buildings close to the road frontage, and their visual and functional relationships with the avenue, Houghton Grange and Houghton Road would remain readily appreciable. Removal of the roundabout also obviates the previously alleged effects on Houghton Hill House and Eagle Mill.

3.24 On the Applicant's evidence, those measures preserve the aspects of setting that contribute to the significance of the listed Gate Lodges and the Houghton and Wyton Conservation Area, such that no heritage harm arises. If the decision-maker nevertheless adopts the Conservation Officer's view, the residual effect would amount to harm to the significance of the Grade II Gate Lodges (and/or the Conservation Area) through change to their setting. That harm would not constitute substantial harm for the purposes of HE5(2). Nevertheless, in accordance with HE6, substantial weight must be given to the conservation of the designated heritage assets. This does not prescribe the outcome of the decision: the harm must then be weighed against the proposal's public benefits under HE6(4), as set out in the Planning Balance.

3.25 Archaeological trial trenching has been carried out in line with an agreed Written Scheme of Investigation. The Council's Archaeological Advisor confirms that archaeology does not preclude development, and a programme of investigation can be conditioned.

Other technical considerations

3.26 Natural England and the Council's ecology adviser raise no objection. The extensive green-infrastructure network, on-site recreational provision and long-term management address recreational pressure on Houghton Meadows SSSI, while biodiversity net gain substantially exceeds the statutory minimum (estimated to be in excess of 35%).

3.27 The site is not at risk from flooding, and the Lead Local Flood Authority raises no objection. The drainage strategy uses attenuation ponds, swales, permeable paving and rainwater harvesting, with discharge restricted to 14.1 l/s. Anglian Water confirms treatment and network capacity. Appropriate conditions can secure detailed design and maintenance.

3.28 Arboricultural, noise, air-quality, contamination, lighting, utilities, fire-access and designing-out-crime matters are similarly capable of proportionate control.

Draft section 106 heads of terms

3.29 Subject to final agreement and the statutory tests, the Section 106 agreement should secure:

- On-site affordable housing in line with the Development Plan requirement, with 70% social or affordable rent and 30% shared ownership, and the mix, type, accessibility and tenure provisions agreed with the Council;
- early-years contribution of approximately £685,162;
- secondary-education contribution of approximately £2,158,400 towards St Peter's School;
- SEND contribution of approximately £467,999;
- libraries and lifelong-learning contribution of approximately £36,816, plus the applicable monitoring fee;
- formal outdoor-sports contribution of £172,368 towards provision in St Ives (unless this is confirmed to be covered by CIL, noting that the new sports pitches at HDC One Leisure are referenced at page 11 of the Infrastructure Funding Statement 2024-2025);
- primary-care contribution of approximately £282,801 (unless this is confirmed to be covered by CIL);
- wheeled-bin contribution of £114 per dwelling and £669 per communal bin, as applicable;
- on-site public open space, play provision and management arrangements;
- delivery and maintenance of the OLSIO active travel/footpath link, with the final alignment agreed;
- safeguarding of land for potential future highway improvements to be delivered by the Highway Authority;

- biodiversity net gain, a 30-year Habitat Management and Monitoring Plan and monitoring contribution (indicated as approximately £13,597.50); and

- Travel Plan obligations and any agreed public-transport or sustainable-travel measures.

3.30 The figures will be calculated at the reserved matters stage, once the precise number of homes and mix is known. Off-site highway works as set out in the Transport Assessment Addendum will be delivered through section 278 arrangements.

4. Planning Balance

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

4.2 As the site is outside of the settlement boundary, there is conflict with the Development Plan policies restricting this. HDC cannot demonstrate a five-year housing land supply (3.68 years according to HDC), and so NPPF Policy S5(1)(j) applies

4.3 The Huntingdonshire Local Plan to 2036 policies concerned with the supply and location of housing relevant to the site – Policies LP2, LP7 and LP10 (in part) – are materially inconsistent with NPPF Policy S5(1)(j). In accordance with Annex A of the NPPF, very limited weight is therefore afforded to those policies insofar as they restrict the location of development. Policy LP10's objectives of protecting amenity and countryside character, and of avoiding higher-value agricultural land where possible, remain relevant to the assessment of the proposal's actual effects.

4.4 Whilst very limited weight is afforded to the Local Plan Policy LP2 given it is based on an out-of-date housing need and is inconsistent with NPPF Policy S5, it is worth noting that it identifies St Ives as one of four market towns and the 'most sustainable centres' where the majority of growth is directed through LP2. The suitability of the site is strengthened further by its identification as a draft allocation with the emerging Local Plan (St Ives 1).

4.5 NPPF Policy S5(1)(j) requires that the development would '*be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure*'. Development would be physically well-related to the existing settlement of St Ives by virtue of existing housing to the east and south, as well as the business park to the site's west. The development is of a scale that can be accommodated via either existing infrastructure, as demonstrated through consultation responses including around foul water capacity (unlike many parts of the District); and via improvements secured through contributions, for example education and healthcare.

4.6 As the proposal complies with S5(1)(j), the application should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework. As per S5(2), there are not considered to be any national decision-making policies which state that development proposals should be refused. A planning balance is set out below.

Benefits

4.7 The proposals will deliver the following substantial benefits:

- Addressing the significant housing shortfall through the delivery of a broad range and mix of high-quality, energy-efficient new market and affordable homes in a sustainable location benefitting from active travel links into St Ives and adjacent to the Guided Busway – **Substantial weight**, as directed by NPPF HO7.

- Meeting affordable housing needs in the context of significant affordability in Huntingdonshire (the five-year average affordability ratio is 9.4[1]) – **Substantial weight**, as directed by NPPF HO7.

- High-quality, landscape-led design responds positively to the site's edge-of-settlement context and surrounding character, in accordance with Local Plan Policies LP11 and LP12 and the Huntingdonshire Design Guide SPD. The scheme provides publicly accessible open space and green infrastructure consistent with LP3, retains and reinforces trees, hedgerows and structural planting in accordance with LP31, and creates a strong landscaped western edge to soften the transition to the countryside, contain the new settlement edge and address perceived coalescence. The outline parameters secure the principle of that landscape framework, with detailed treatment to be controlled through reserved matters and the Design Code – **Substantial weight**, reflecting NPPF DP3(3).

- Improvement to active travel connectivity including the link through to St Ives One Leisure Outdoor Centre, helping to facilitate the strategic A141 and St Ives Transport Improvement Scheme – **Significant weight.**

- Delivery of biodiversity net gain well in excess of the statutory minimum requirement with the potential to achieve over 30% Biodiversity Net Gain onsite – **Significant weight.**

- The creation of direct jobs during construction which will support the supply chain, while expenditure by future residents will benefit the local economy. The delivery of affordable housing will also help address a recognised constraint on recruitment, whereby employers struggle to recruit people who cannot afford to move to or live in the area[2] – **Significant weight**[3].

- Providing accessible, high-quality open space, alongside delivering environmental enhancements through biodiversity net gain and sustainable drainage measures to manage surface water – **Significant weight.**

[1] Huntingdonshire District Council | Pre-Submission Local Plan to 2046, paragraph 3.20
[2] Huntingdonshire District Council | Pre-Submission Local Plan to 2046, paragraph 4.70
[3] Without double counting the benefit of affordable housing

Adverse effects

4.8 The adverse effects are limited. Heritage is weighed under HE6 and so is expressed in the policy's own terms; the landscape and agricultural effects are weighted on the general scale.

- **Heritage:** The Applicant's evidence is that no harm arises. If the Conservation Officer's view is preferred, the effect would be harm under HE5 (the Officer's "less-than-substantial harm" under the 2024 NPPF) at the lower end of the range, through change to the setting of the Lodges and/or to the Conservation Area; it would not constitute substantial harm. In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and HE6(1) and HE6(3), substantial weight is given to conservation of the designated heritage assets and the harm is treated as a matter of considerable importance and weight – **Substantial weight** as per HE6; **harm limited in scale**.

- **Landscape and visual:** Development would permanently change the site from urban-fringe arable land to housing, producing a major adverse effect on the site itself, although this is typical of any greenfield development and should be considered unavoidable given the scale of unmet housing need. Wider effects are materially lower and geographically contained, with moderate/minor adverse effects on the Central Claylands, minor adverse effects on the Western Claylands and visual effects concentrated on nearby roads and the western public footpath. The western landscape buffer, reinforced boundaries and reduced heights would soften effects as planting establishes. Given the site's low landscape value, localised effects and secured mitigation – **Moderate adverse weight**.

- **Highways and transportation:** The Transport Assessment Addendum identifies some residual increases in queueing and delay at parts of the wider highway network. However, the evidence demonstrates that these effects arise principally within a network already forecast to experience significant congestion as a result of existing conditions and background traffic growth. The proposed development is accompanied by a package of highway, safety, active-travel, public-transport and travel-plan measures, including improvements to walking and cycling connectivity, targeted highway interventions and contributions towards sustainable transport infrastructure. The assessment concludes that there would be no unacceptable impact on highway safety and no severe residual cumulative impact on the transport network. Accordingly, any residual transport effects attract **limited adverse weight**.

- **Agricultural land:** Loss of up to 15.25ha of best and most versatile agricultural land (grade 3a). This is not considered to conflict with LP10 as there is no evidence that poorer quality land is suitable and available (see Agricultural Land

Classification Report), particularly given the scale of the housing land shortfall – **Limited weight**.

Overall Planning Balance

- The proposal accords with NPPF policy S5(1)(j): it would meet evidenced housing need, is physically well-related to St Ives and is of a scale that can be accommodated through existing and proposed infrastructure.
- The identified benefits are substantial and multi-dimensional, led by up to 285 homes, including policy-compliant affordable homes provided on-site, alongside active-travel, design, biodiversity, green-infrastructure, open-space and socio-economic benefits.
- The Applicant's heritage evidence concludes there is no harm. If residual harm (but not substantial harm) is found to the significance of the Grade II Gate Lodges through change to their setting (and/or to the Conservation Area), it is given substantial weight in accordance with HE6. The harm is nevertheless outweighed in the HE6(4) balance by the public benefits of the proposal, in particular the delivery of up to 285 homes including policy-compliant affordable housing, each attracting substantial weight under HO7. HE6 therefore does not direct refusal for the purposes of S5(2).
- When heritage harm is then carried into the overall S5 balance alongside the permanent but geographically contained site-level landscape change, the materially lower effects on the wider character areas, the limited distribution of visual effects, residual localised transport effects, agricultural-land loss and limited-weight policy conflict, the adverse effects do not substantially outweigh the benefits.

4.9 The proposal therefore satisfies the decision-making test in NPPF Policy S5(2). No national decision-making policy directs refusal: even if residual heritage harm is found, the public benefits outweigh the harm in line with NPPF Policy HE6(4). It is therefore concluded that the benefits of the proposed development would not be substantially outweighed by the identified adverse effects. Accordingly, the application should be approved in line with NPPF Policy S5(1)(j).

4.10 Alternatively, should the decision maker disagree and consider there to be any conflict with S5(1)(j), then development can also be found to comply with NPPF Policy S5(4). The exceptional circumstances in this case are the benefits as set out above. These benefits substantially outweigh the limited and localised residual adverse effects. The proposal therefore also satisfies the alternative S5(4) route.

Appendix 1: Consultation Response Summary

Consultee / group	Short summary of comment	Applicant response / current position
Cambridgeshire Fire and Rescue Service	Fire hydrants required; fire-appliance access to comply with Building Regulations.	Accept appropriate condition; detailed access addressed at reserved matters and Building Regulations stages.
National Highways	No objection; development unlikely to have a severe impact on the strategic road network.	No further action.
St Ives Town Council; Houghton and Wyton, Wyton-on-the-Hill and Hemingford Grey Parish Councils	Objections concerning policy conflict, traffic, infrastructure, drainage, landscape, coalescence, agricultural land, heritage and the planning balance.	Technical consultees raise no in-principle objections other than outstanding CCC highway matters which are addressed through the submitted TA Addendum. The emerging allocation, five-year supply shortfall, mitigation and planning balance are addressed in this Addendum.
Active Lifestyles Team	Requests £172,368 for formal outdoor sport and prefers option 1 for the OLSIO link.	Contribution and delivery of the link are included in the draft heads of terms; final alignment to be agreed.
Natural England	No objection following Green Infrastructure information.	Mitigation and long-term management to be secured.
Lead Local Flood Authority	No objection in principle subject to conditions.	Detailed SuDS design and maintenance can be conditioned.
Active Travel England	Recommends approval subject to conditions and/or obligations.	Relevant active-travel and Travel Plan measures will be secured.
CCC Education, Libraries and Strategic Waste	Requests early-years, secondary, SEND and library contributions; no primary or strategic-waste contribution.	Updated figures are included in the heads of terms.
Anglian Water	No objection; treatment and network capacity available,	No further action.

	subject to asset and connection requirements.	
Affordable Housing Officer	No objection; mix, type, accessibility and tenure to be specified in the section 106 agreement.	Noted. Policy-compliant affordable housing offered; detailed provisions to be agreed.
Cambridgeshire Constabulary	Low crime risk; recommends Secured by Design engagement and suitable lighting.	To be addressed through reserved matters and lighting details.
East of England Ambulance Service	Requests CIL support for ambulance infrastructure and identifies health, design and accessibility measures.	Comments noted; detailed design matters will inform reserved matters.
CCC Archaeology	Trial trenching confirms archaeology does not preclude development; recommends conditions.	Recommended programme and conditions accepted.
Cambridgeshire and Peterborough Integrated Care System	Requests primary-care contribution because local capacity is insufficient.	Updated pro-rata contribution for 285 dwellings included in heads of terms.
Environmental Health	Accepts acoustic evidence subject to mitigation; requests contamination and CEMP conditions and clarification for façades facing Houghton Road.	Accept proportionate conditions; acoustic mitigation to be confirmed at reserved matters.
CCC Highways	Site access acceptable in principle, but further work required on off-site modelling, mitigation safety, deliverability, sustainable travel, bus provision and securing mechanisms.	The final amendments and TA Addendum provide a comprehensive response.
Arboricultural Officer	No objection; retained trees can be protected.	Tree protection and detailed layout safeguards accepted.
Urban Design Officer	Seeks coordination of the parameter plan, frontage landscape, active-travel	Final amendment package aligns the plans while retaining sufficient

	corridor and highway drawings.	landscape offset and deliverable access infrastructure.
Place Services Ecology	No objection subject to ecological conditions and long-term green-infrastructure management.	Conditions and management obligations accepted.
Landscape Officer	Identifies localised moderate/major adverse effect initially, reducing to moderate adverse; acknowledges removal of roundabout reduces wider harm.	Residual localised harm is acknowledged and weighed in the planning balance. Detailed landscaping will reinforce mitigation.
Conservation Officer	Identifies less-than-substantial harm, principally to the Gate Lodges' settings, and seeks greater landscape offset.	Roundabout removed; setbacks, lower heights and frontage landscaping reduce effects. Any residual harm is outweighed by public benefits.
Cadent Gas	No objection subject to informative and protection of apparatus.	Noted.
Residents	Objections focus on traffic and road capacity, pressure on schools and healthcare, drainage and water pressure, agricultural land, wildlife, settlement separation, construction disruption and policy conflict.	The matters are addressed by the technical evidence, consultee positions, conditions and obligations, emerging allocation and the planning balance. The final TA Addendum provides a definitive transport response.

Appendix 2: List of Application Documents

Document / Drawing Title	Original Reference	Updated Reference (where applicable)
Plans (those plans marked with an asterisk are for information only, not approval)		
Bellway Promotion Plan (showing all land in blue, being promoted by Bellway through the emerging Local Plan)*	N/A	603_L02
Green Infrastructure Plan	N/A	603_P04
Illustrative Masterplan*	603_P01	603_P06 E
Land Use Parameter Plan	603_P02	603_P05 G
Proposed Access Arrangements Ghost Island Plan	23376_03_020_11 Rev A	23376_03_020_11.2 Rev G
Site Location Plan	603_L1 (March 2025)	603_L01 (February 2026)
St Ivo Outdoor Centre Proposed Site Plan[4] *	N/A	G-222967_03 Rev 00
Reports		
Acoustic Assessment	March 2025	No change required
Agricultural Land Classification Report	January 2025	No change required
Air Quality Assessment	February 2025	No change required
Arboricultural Impact Assessment	January 2025	No change required
Archaeological and Heritage Assessment	March 2025	No change required
Archaeological Evaluation Report	March 2026	No change required
BNG Metric	February 2025	No change required

[4] This plan is not produced by, or on behalf of, Bellway, but has been produced by a third party in support of the application for new pitches at the St Ives Outdoor Centre. It is submitted here to help demonstrate that Bellway's indicative proposals for the footway/cycleway through the outdoor centre (as shown in the Transport Assessment) can be accommodated alongside the emerging pitch proposals

Biodiversity Net Gain Assessment	February 2025	No change required
CIL Additional Information Form	18 February 2025	No change required
Design and Access Statement	January 2026	No change required
Ecological Appraisal	February 2025	No change required
Flood Risk Assessment and Drainage Strategy	February 2025	No change required
Great Crested Newt District Level Licensing	November 2024	No change required
Green Infrastructure Statement	April 2026	No change required
Health Impact Assessment	February 2025	No change required
Heritage Note	December 2025	No change required
Highways Response Report	N/A	November 2026
Interim Archaeological Evaluation Report	January 2026	Superseded by Archaeological Evaluation Report (March 2026)
Landscape and Visual Impact Assessment	April 2026	No change required
Lighting Impact Assessment	March 2025	No change required
Phase 1 Geo-Environmental Desk Study	February 2025	No change required
Planning Statement	March 2025	Addendum – November 2026
Statement of Community Engagement	March 2025	No change required
Sustainability Statement	February 2025	No change required
Transport Assessment	June 2026	No change required
Travel Plan	March 2025	February 2026
Utilities Assessment	March 2025	No change required