OFFICER REPORT

Case No: **24/02275/FUL** **Full Planning Application**

Proposal: **Development of Use Class C2 Residential Accommodation with Care comprising of apartments for people aged 65 and over, communal facilities, associated landscaping, car parking, services and access from Meadow Lane**

Location: **Land At Junction Of Harrison Way And Meadow Lane St Ives**

Applicant: **Mr Edward Harper (Gladman Retirement Living)**

Grid Ref: **531793 271283**

DESCRIPTION OF SITE AND APPLICATION

Site and Surroundings

1. The site comprises an undeveloped parcel of land measuring 1.17 hectares on south-eastern edge of St Ives. The site is located on the edge of a man-made lake, used by Hunts Sailing Club, to the north which runs along most of the eastern boundary. The site is enclosed by mature tree planting to the west (adjacent to Harrison Way) and a mature hedgerow to the south (north of Meadow Lane). The site comprises greenfield urban land and forms part of the wider Meadow Lane Gravel Pits County Wildlife Site and Great Ouse Valley Green Infrastructure Priority Area.

2. The site is located approximately 300m east of the St Ives Town Centre and abuts Meadow Park to the south – a group of 2.5 and 3 storey pitched roof office buildings, some of which have been converted/have permission for conversion to residential use. To the northwest is largely residential, with predominantly 20th century housing. The St Ives Conservation Area boundary lies immediately to the west side of Harrison Way. To the south west lies the Park and Ride and further along Meadow Lane there are industrial uses.

3. The site is predominantly located in Flood Zone 1 on the Environment Agency's Flood Map for Planning and the Strategic Flood Risk Assessment (SFRA 2024), however the northern part of the site adjacent to the lake falls within Flood Zones 3a and 3b and are shown at being at risk of surface water flooding. There is also surface water flood risk on Meadow Lane outside the application site boundary.

Proposal

4. The proposal includes 86 Use Class C2 apartments (comprising 45 No. one bedroom, 30 No. two bedroom, and 11 No. three bedroom apartments) across two buildings, 52 car parking spaces, including 4 disabled spaces, communal facilities, associated amenity space and landscaping and 2 vehicular accesses from Meadow Lane.

5. Communal facilities within the proposed development would include an administrative office and staff facilities for 24-hour care; a residents lounge, coffee bar and restaurant with associated kitchen; hair salon; activities studio; meeting room; therapy room; internal mobility scooter store; assisted bathroom; and guest suite.

6. All apartments would either sold on long leases or short-term rental lease. The freehold would belong to Gladman Retirement Living Ltd trading as Adlington Retirement Living. In order to

occupy an apartment, an individual must be over 65, assessed to be need of care (following a personalised care assessment) and agree to pay the service and wellbeing charge through the lease which ensures that all residents receive a basic level of care (2 hours per week).

7. This application has been accompanied by the following supporting documentation:
   - Design and Access Statement
   - Statement of Landscape Design
   - Planning Statement
   - Care Statement
   - Parking Statement
   - Statement of Community Involvement
   - Phase 1 Site Investigation
   - Flood Risk Assessment
   - Drainage Strategy
   - Ecological Appraisal
   - BNG Report
   - BNG – Statutory Biodiversity Metric
   - Arboricultural Assessment
   - Transport Statement
   - Travel Plan
   - Heritage Statement
   - Noise Impact Assessment
   - Specialist Housing Need Assessment
   - 5YHLS Assessment
   - Air Quality Screening
   - Sustainability Statement
   - Rapid Health Impact Assessment
   - Landscape and Visual Appraisal
   - Economic Impact Assessment
   - Wastewater and Utilities Statement
   - Daylight/Sunlight Report

8. With regard to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 the development does not meet the criteria to require a detailed screening opinion, as the application proposes less than 150 dwellings. It is therefore not anticipated that the project would have significant environmental effects and is therefore not considered to be EIA development.

NATIONAL GUIDANCE

9. 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).'

10. The NPPF 2024 sets out the Government's planning policies for (amongst other things):
    - o delivering a sufficient supply of homes;
    - o building a strong, competitive economy;
    - o achieving well-designed, beautiful and safe places;
    - o conserving and enhancing the natural, built and historic environment.

11. National Planning Practice Guidance and the National Design Guide are also relevant and material considerations.

For full details visit the government website: https://www.gov.uk.

PLANNING POLICIES

12. Huntingdonshire's Local Plan to 2036 - adopted May 2019
*Policy LP1 – Amount of Development
*Policy LP2 – Strategy for Development
*Policy LP3 – Green Infrastructure
*Policy LP4 – Contributing to Infrastructure Delivery
*Policy LP5 – Flood Risk
*Policy LP6 – Waste Water Management
*Policy LP7 – Spatial Planning Areas
*Policy LP10 – The Countryside
*Policy LP11 – Design Context
*Policy LP12 – Design Implementation
*Policy LP14 – Amenity
*Policy LP15 – Surface Water
*Policy LP16 – Sustainable Travel
*Policy LP17 – Parking Provision and Vehicle Movement
*Policy LP24 – Affordable Housing Provision
*Policy LP25 – Housing Mix
*Policy LP26 – Specialist Housing
*Policy LP29 – Health Impact Assessment
*Policy LP30 – Biodiversity and Geodiversity
*Policy LP31 – Trees, Woodland, Hedges and Hedgerow
*Policy LP34 – Heritage Assets and their Settings
*Policy LP36 – Air Quality
*Policy LP37 – Ground Contamination and Groundwater Pollution

13. Supplementary Planning Documents (SPD) and Guidance:
*Huntingdonshire Design Guide SPD (2017)
*Huntingdonshire Landscape and Townscape Assessment (2022)
*Cambridgeshire Flood and Water SPD (2017)
*Developer Contributions SPD (2011)
*Developer Contributions: Updated Costs 2023/24
*Annual Monitoring Report

14. Draft St Ives Neighbourhood Plan (2019 – 2036)

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

PLANNING HISTORY

15. 0100516S73 – Variation of time limit conditions imposed on permission reference 89/2252 for the erection of offices (A2 and B1) – Approved

95/00760/FUL – Construction of sewage pumping station and erection of enclosure – Approved

9401632ADV - Display of sign boards, Meadow Lane (South) & (North), St. Ives – Consent

8902252OUT – Erection of office suites for A2 and BI uses – Approved

8300306FUL – Toilets – Approved

8001346FUL – ERECTIIN OF PREFABRICATED BUILDING FOR USE AS SPORT AND SOCIAL CLUB OFF MEADOW LANE ST IVES – Approved

7901838S73 – RENEWAL OF TEMPORARY PERMISSION FOR RETENTION OF OFFICE ACCOMMODATION THE PADDOCK MEADOW LANE ST IVES – Approved

7701352FUL – Installation of petrol storage tank – Approved

7700849FUL – OFFICE EXTENSION – Approved

7600181POTHER – PREFABRICATED BUILDING FOR TEMPORARY OFFICES MEADOW LANE ST IVES – Approved

7500860FUL – TEMPORARY OFFICE BUILDING – Approved

7400385FUL – SAND & GRAVEL EXTRACTION – Approved

7400163OUT – OFFICE BUILDING – Approved

CONSULTATIONS

18. Needingworth Parish Council – Objection.
*Localised flooding - this site is next to a lake in a flood zone 3. The roundabout on Harrison Way that is the main access point regularly floods after/during periods of heavy rain.
*Design: The building is not in keeping with the market town of St Ives.
*Impact on wildlife will be detrimental.
*Infrastructure- pedestrian access to/ from St Ives will be dangerous. Provision would need to be made to assist with road safety.
*Harrison way is always congested at peak times and this development will only add to the current issues

19. St Ives Town Council – Objection.
*Due to its undeveloped nature, lakeside setting, current land use (or lack of) and the physical separation from the town with Harrison Way to the west and Meadow Lane to the south, the site is outside the St Ives built up area. This conclusion is reflected in the built-up area boundary proposed in the emerging St Ives Neighbourhood Plan. Conflict with Policies LP7 and LP10.
*The site is an undeveloped area with trees and vegetation that makes an important contribution to the setting of the town and its development would adversely impact on the town's character and be harmful to its surroundings. Conflict with Policies LP10 and LP11.
*The site contributes to the setting of the St Ives Conservation Area and would fail to preserve or enhance the character or appearance of the Conservation Area. Conflicts with Policy LP34.
*The Landscape and Visual Appraisal assessment and photos postdate the degradation of the site resulting from the removal of significant trees and vegetation. The assessment did not therefore address the sites much greater significance prior to this.
*The site is part of an area surrounded by FZs 2, 3a and 3b and is therefore susceptible to future flood risks. Considering the proposed accommodation would be occupied by elderly people in need of care with limited mobility, the site is inappropriate for the proposed development and conflict with Policy LP5.
*The applicant has yet to demonstrate that surface water from the development can be managed and the necessary discharge permits and agreements secured. Conflict with Policy LP15.
*Due to the height, form and mass the proposal is inappropriate in design terms and will dominate the surrounding area resulting in unacceptable visual harm. Conflict with Policies LP11 and LP12.
*Loss of onsite biodiversity. The Ecological Assessment report is based on a site survey undertaken in October 2023 and subsequently updated in May 2024. In the intervening period trees and vegetation were removed from the site and this is corroborated by the submitted Environmental

Assessment (page 10) and Phase 1 Geo-Environmental Impact Report (page 3). This action was prejudicial to the proper consideration of Policy LP31.
*The Biodiversity Net Gain Report fails to acknowledge any degradation of habitat has occurred. Conflict with Policy LP30.
*Pedestrian access and connectivity. Without further off-site improvements the development would not be easily accessible to shops, services, community facilities' and does not fulfil criteria e of Policy LP26.
*Introduction of a signalised crossing within the close proximity of the roundabout and existing signalised crossing to the Bus Way terminal would compound existing congestion problem. Conflict with Policy LP17.
*Existing B2 business activity will generate noise that would impact residential amenity. The site is inappropriate for the proposed development.
*Anglian Water has inadequate capacity to accept further connections. The development would have a negative impact for wider residents of the town in flooding and pollution terms.
*Electricity supply network issues
*Recreational impact on Hunts Sailing Club due to the proposed development being in line with the prevailing wind direction and would result in wind shadow affecting the recreation use of the sailing lake
*The nature of care defined in the supporting Care Statement is surprisingly wide and there is a possibility the apartments could be occupied as Use Class C3.
*The need identified in the Stantec Need Report does not translate into a figure for local people in the town who would be able to afford the accommodation with the high service and care plan. Without the affordability being considered, the need for 86 C2 market apartments is not proven.

20. Local Lead Flood Authority (Cambridgeshire County Council) – Objection due to lack of maintenance plan and the proposed discharge rates.

Updated comments 13/03: Objection due to lack of maintenance plan.

21. Highways Development Management (Cambridgeshire County Council) – The proposed scheme incorporates a new controlled crossing and new vertical feature within the existing adopted highway and will therefore need to go through a stage 1 (in principle) safety audit. I request that this application is not determined until this process has been completed to ensure that proposed is safe and deliverable. The applicant should contact the County Council to get this process started. Two accesses are proposed with the eastern access eastern splay falling below the required standard for vehicle-to-vehicle visibility, while we do accept splays taken with an off set of 1m, this offset must be to the required standard I.E in this instance 43m.

22. Transport Assessment Team (Cambridgeshire County Council) – Objection. The application as submitted needs to be reassessed as it does not include sufficient information for the Local Highway Authority to consider the application. The proposed signalised crossing on Harrison Way requires the necessary modelling explained above to demonstrate how a signalised crossing would impact the highway network. The relevant contact details to discuss these further have been provided. The official accident date will need to be provided. Then the further information should be provided on the securing of the cycle parking. Also, the trip generation methodology should be revised to us comparable sites to St Ives in the trip generation assessment. The Travel Plan also requires further information mentioned in this response. The Highway Authority therefore requests that this application not be determined until such time as the additional information as requested above has been submitted and reviewed.

23. Active Travel Team (Cambridgeshire County Council) – Welcome the proposals for a new controlled crossing and improved uncontrolled crossing to facilitate access to nearby destinations, however additional off-site highway improvement works are recommended.

24. Historic Environment Team (Cambridgeshire County Council) – No objection subject to condition securing programme of archaeological investigation and recording.

25. Minerals and Waste Planning Authority (Cambridgeshire County Council) – The site lies within a Sand and Gravel Mineral Safeguarding Area which is safeguarded under Policy 5 of the MWLP. The topic of Policy 5 is addressed by the Planning Statement accompanying the application. It adequately demonstrates the prior extraction in this instance is unlikely to be feasible and that any material indecently extracted will be addressed through the Construction Environmental Management Plan. If the planning authority is of the view that there is an overriding need for the development, the MWPA is satisfied that the proposal accords with Policy 5.

26. HDC Environmental Health –

Contamination:
Agree with the preliminary risk assessment recommending a phase 2 intrusive ground contamination risk assessment. A condition is recommended to secure this.

Air Quality:
A condition recommended to require a Construction Environmental Management Plan

Noise:
Objection on the grounds of adverse noise impact on future residents as there is insufficient information to demonstrate sound levels will be mitigated to an acceptable level.

Odour:
No details regarding potential odour impact. Recommend that this information is submitted or if appropriate, a condition requiring the information to be submitted. I have considered potential odour impact from the recycling centre, however due to the distance and direction, this is not considered a significant issue.

27. HDC Urban Design – There is concern the four storey massing of Building 1 (which steps closer to Meadow Lane compared to Building 2) would appear prominent in views looking along Meadow Lane towards the Harrison Way / Meadow Lane roundabout. A setback is required to the third-floor level to reduce the perceived massing and create a more sympathetic scale relationship with the adjacent Chestnuts building on the south side of Meadow Lane. In addition to this, amendments are required to the southwestern elevations of both buildings facing Meadow Lane to break up and articulate these prominent facades.
The slate grey-clad third floor levels create a 'top heavy' appearance and are poorly integrated with the overall elevations. Amendments are required to the colour (recommend a vertical light grey coloured cladding to relate to the tone of the facing brickwork) and arrangement (setback from the facing brickwork) of the cladding to reduce its prominence. The parapet height over the brick bays and brick framed balconies on the northwest elevation of Building 1 and north east and south east elevations of Building 2 should be increased to better integrate the third floor into the development and reinforce the subservient appearance of this floor level.
Comments raised relating to the material samples, architectural details, roof plant, roof access / guarding and external lighting should be addressed by way of suitably worded planning conditions to be agreed with the case officer. Details of finished floor levels and existing and proposed ground levels should also be conditioned.

28. HDC Ecology Officer – Based on the submitted information, the approach to protected species, biodiversity net gain, and the mitigation and enhancement measures, are unacceptable and strong objections to the proposal are raised as the application fails to:

- Ensure the development delivers a 10% Biodiversity Net Gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- Comply with Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

- Comply with Regulation 43 of The Conservation of Habitats and Species Regulations 2017 (as amended) as it will cause deliberate disturbance that is likely to impair the ability of multiple protected species to survive or to breed or reproduce.
- Demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated in line with Local Plan Policy LP30
- Follow an established methodology to produce an assessment of habitats and species in line with Local Plan Policy LP30.
- Represent the avoidance of adverse impacts to biodiversity by all possible efforts in line with Local Plan Policy LP30
- Comply with DEFRA's Statutory Biodiversity Metric User Guide

29. HDC Arboricultural Officer – Recommend refusal. Recommend application of a Tree Preservation Order to the trees on site in order to prevent more preemptive felling, to ensure the retention of the perimeter trees, and to prevent any further construction/machinery associated damage.

30. HDC Landscape Officer – Resist the application for reasons set out in consultation response and allow the habitat to recover.

31. Environment Agency – No objection providing the LPA takes into account the flood risk considerations. Our flood map shows that the site lies in FZ 1 however areas surrounding the site including parts of the access roads are shown to be within FZ2 and 3. The FRA has not demonstrated that safe access and escape is available in the event of flooding to an area outside the floodplain up to a 1% annual probability flood event, including an allowance for climate change. A Flood Evacuation Plan has not been proposed.

Updated comments 17/03: Figure 1 from our Risk of Flooding from Rivers and the Sea is not suitable for use in assessing flood risk for planning purposes. Our flood map for planning shows that part of the access/escape route is in FZ 2 and 3 and may therefore be at risk of flooding. We are pleased that a Flood Warning and Evacuation Plan will be produced as a precautionary measure. Recommend that you consult your Emergency Planners and the emergency services on an Flood Plan submitted to address the issue of safe access and escape.

32. Natural England – No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

33. The Wildlife Trust – Objection due to its location within the Meadow Lane County Wildlife Site and its unacceptable impacts from both direct loss of habitats and potential indirect impacts such as from associated activities associated with the development including construction disturbance, noise and pollution and potentially recreational disturbance.

34. Anglian Water – Objection to any new connections to the foul network. The introduction of additional flows from the proposed development would result in unacceptable risk of flooding and pollution spills within the local network. Anglian Water are therefore unable to identify a sustainable point of connection.

Updated comments received 11/02: We can confirm that Anglian Water have planned investment within the St Ives catchment which is currently scheduled to be delivered in 2027. This investment will deliver improvements to the foul network downstream to the proposed development site. As such we can now remove our objection and recommend a pre-occupation condition to ensure no connections are made until full delivery of this network scheme.

Updated comments received 18/03: We can confirm that Anglian Water have planned investment within the St Ives catchment which is currently scheduled to be delivered in 2027. This investment

will deliver improvements to the foul network downstream to the proposed development site. As such we can now remove our objection and recommend a pre-occupation condition to ensure no connections are made until full delivery of this network scheme.
No objection to surface water drainage scheme.

35. Cambridgeshire Constabulary – No objection subject to observations and recommendations being considered.

36. East of England Ambulance Service NHS Trust – This development of 86 apartments for people aged 65 and over, would see an increase in patients of circa 98 residents (assuming 1.5 persons per apartment) which could generate an additional 22 emergency incidents per annum which combined with other developments in the local area places significant pressure on the existing Huntingdon Hub which does not have capacity for expansion.
A new purpose-built Huntingdon Hub would hold a maximum of 35 ambulances and 4 rapid response vehicles. Each ambulance requires 78.46m2 GIA at a cost of £5,167 per m2.
Ambulances would start and finish from the Hub, travelling to nearby ambulance response posts/stations to provide additional emergency ambulance services to meet population growth arising from this development. A developer contribution will be required to mitigate the impacts of this proposal and is calculated at £15,068.

37. Sport England – Support the comments raised by the RYA and objects to the planning application in its current form. It is recommend that the LPA have regard to the RYA's comments in reaching a position as to whether it considers the proposal would meet national and local policy, in particular the need for a wind study to be undertaken to understand the impact of the development on the wind regime across the lake and whether impacts should be mitigated.

38. HDC Conservation Team – The proposed development is unlikely to have a negative impact on the significance of the St Ives Conservation Area.

REPRESENTATIONS

39. 48 representations have been received in objection to the proposed development. The concerns raised have been summarised below:

- Wind shadow impact severely affecting sailing conditions and compromising the functionality of Hunts Sailing Club which is an important recreation facility for St Ives
- Flood risks
- Building on this greenfield site is unnecessary when brownfield sites are readily available in the town
- Destruction of the wooded area prior to submitting the application disregards its ecological value and undermines the integrity of the planning process
- Water contamination to lake used for sailing, paddle boarding and swimming as well as wildlife from proposed surface water drainage scheme
- Size, scale and design of proposals out of character with the County Wildlife Site and the surrounding landscape
- Poor design and overbearing scale
- Site is outside the built up area of St Ives
- Highway safety implications of controlled crossing installed in close proximity to another similar crossing on a road that at peak times is at a standstill with traffic congestion
- Damage to ecology and biodiversity
- Potential harm to bats and other species present on site
- Additional traffic to Harrison Way which is already under strain at peak periods
- The site is inappropriate for older people as it is separated from all services by a busy main road and difficult to cross
- Not easily accessible to the town centre for pedestrians or mobility scooters

- This is a recreation site and area of significant flora and fauna of scientific and environmental interest
- The building is situated close to a busy road, and the residents will have a noisy environment in which to live
- Submitted arboricultural report completely omits the trees along the bank of the lake between T3(B) and T19(B)
- The Landscape and Visual Appraisal report does not point out that the site has been an empty area since the 90s, and that environmental succession has been allowed to continue since then
- The site is within Green Infrastructure Priority Area
- Lack of consultation
- The development would not provide affordable care

40. St Ives Civic Society – Objection due to increased congestions on Harrison Way, exacerbated by the provision of a pedestrian controlled crossing by the roundabout. This roundabout is already the cause of much of the congestion on Harrison Way. Even with its provision it is likely to be dangerous crossing for pedestrians especially those of limited mobility. Pedestrians will also have to cross Meadow Lane which is used by significant numbers of HGVs and can be very busy at peak times.
The site is not easily accessible for those using public transport. There is a significant walk to the nearest bus stops. Concerned by loss of biodiversity by a significant development on the site, part of the County Wildlife Site.

41. Royal Yachting Association (RYA) – Recommend refusal. The applicant should commission a suitable wind study to understand the impact of the development on the wind regime across the lake. Modelling undertaken by the applicants for other developments close to sailing areas has been deficient in terms of measuring the actual impact on recreational sailing. The RYA recommends that the study parameters and criteria for judging impact are agreed with the RYA and HSC prior to commissioning any work. Significant impacts should be mitigated through design changes and any required support to HSC prior to permission being granted.

42. Great Ouse Valley Trust – disregard of the County Wildlife Site, as destruction of trees and habitat happened over one day in May, during nesting season, which has destroyed habitats for countless species, during bird nesting season no less, and before the biodiversity survey and application were submitted. No acknowledgement or provision for flooding or safe evacuation of elderly residents in the event of flooding(4 storeys, lifts, what happens during flooding in the event of a power cut?). Traffic implications. Unsuitable as greenfield site and there are brownfield alternatives. Contribution to creeping urbanisation which in turn will adversely impact the rural nature of the area, potentially impacting the Great Ouse Valley Way with permanent loss of uninterrupted tree line from various aspects. Light pollution from the proposed development would impact light sensitive species, especially insects and bats. The loss of biodiversity, amenity, damage to visual landscape and views impacted from multiple standpoints for countless boaters, walkers, cyclists, nature lovers and users of the Ouse Valley far outweigh the pleasant views over the lake for the development's residents.

PLANNING ASSESSMENT

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

- Principle of development including Landscape and Countryside Character
- Provision of Specialist Housing
- Affordable Housing Provision
- Residential Amenity
- Transport and Highway Matters
- Impact on Heritage Assets

- Flood Risk and Drainage
- Biodiversity/Ecology
- Impact on Trees/Woodland
- Developer Contributions

*Principle of development (including its impact on the character and appearance of the area)

Spatial Strategy

44. Policy LP2 of the Local Plan sets out the Council's strategy for development and distribution of growth which will help to achieve the strategic approach of concentrating development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities. Huntingdonshire's four spatial planning areas, including St Ives are designated reflecting their status as the district's traditional market towns and most sustainable centres.

45. Policy LP7 states a proposal for housing development (class 'C3') or for a residential institution use (class 'C2') will be supported where it is appropriately located within a built-up area of an identified Spatial Planning Area settlement.

46. Initially, consideration needs to be given as to whether the site forms part of the built-up area of the St Ives Spatial Planning Area. The supporting text to Local Plan Policy LP7 provides extensive criteria-based guidance on the assessment of whether land falls within or outside the built-up area, specifically excluding:
"Agricultural land, woodland, meadow, areas of water and natural habitats that penetrate the built form. These spaces can provide a visual buffer between built development and the open countryside, softening the visual impact and linking the built-up area with its rural context."

47. Meadow Lane Business Park is located to the south of the site which predominantly made up of business/employment uses however prior approval has been granted in recent years to convert the buildings to residential use (C3 uses). Further east along Meadow Lane is a farm centre with café (Farm Club at The Old Pig Farm), Meadow Lane children's nursery, the entrance/exit to St Ives Park and Ride, a Waste Recycling Facility and Marshall's manufacturing site. To the southwest of the site on the other side of the roundabout separated by dense boundary treatment is Cattle Market Car Park and a row of dwellings along Cromwell Terrace. To the west of Harrison Way, there are dwellings fronting Meadow Close and Needingworth Road. The site abuts a large lake to the northeast which is used for recreational purposes such as sailing and fishing.

48. The site is not considered to form part of a distinct group of buildings that includes 30 or more homes. The buildings to the south of Meadow Drove predominantly comprise employment uses within the Meadow Drove Business Park, and the dwellings to west are well contained by a belt of trees. It is considered that Harrison Way defines the settlement edge of St Ives. The application site is not bound by any built development on any side, and it does not have a clear physical or visual relationship with the built-up area. Visually it relates to the countryside comprising the lake and its landscaped edges and comprises a natural habitat which serves as a visual buffer between built development and the countryside.

49. It is noted that the application site was put forward for residential development in the Council's recent call for sites as part of the preparation for the new Local Plan. The outcome of the Land Availability Assessment and Sustainability Appraisal on page 155 states that the site "is inappropriate for development as successfully integrating the site with the existing place and community would be challenging and development would likely adversely impact the character of the County Wildlife Site." St Ives Town Council have objected on grounds that 'due to its undeveloped nature, lakeside setting, current land use (or lack of) and the physical

separation from the town with Harrison Way to the west and Meadow Lane to the south, the site is outside the St Ives built up area. This conclusion is reflected in the built-up area boundary proposed in the emerging St Ives Neighbourhood Plan. Conflict with Policies LP7 and LP10.' These comments are noted. However, given that the St Ives Neighbourhood Plan has not yet been submitted to the District Council, it carries no weight in decision making.

Landscape/Countryside Impact

50. Given the above commentary about how the site appears more visually part of the countryside, policy LP10 is considered to be relevant.

51. Policy LP10 (The Countryside) is the starting point for assessing the principle of development in the countryside. All development in the countryside must:
a. seek to use land of lower agricultural value in preference to land of higher agricultural value:
i. avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and ii. avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;
b. recognise the intrinsic character and beauty of the countryside; and
c. not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

52. The site is not classified as agricultural land and therefore there would not be conflict with Policy LP10 part (a).

53. Policy LP10 part (b) is consistent with paragraph 187b) of the NPPF 2024. Furthermore, paragraph 187a) states planning decisions should protect and enhance valued landscapes and sites of biodiversity value (in a manner commensurate with their statutory status or identified quality in the development plan).

54. The commentary below incorporates comments from HDC's Landscape Officer who has raised an objection to the proposal.

55. The site falls within the Great Ouse Valley landscape character area (LCA) as per the Landscape and Townscape Supplementary Planning Document (2022). Paragraph 7.7 states "Land to the east of Harrison Way is situated within the floodplain of the River Great Ouse. It is visually prominent from surrounding roads and public footpaths and is perceived as part of the Great Ouse Valley landscape which forms the eastern fringe of St Ives. It is predominantly rural in character although it contains the Busway park and ride site, some industrial properties, pasture and large areas of water in former gravel pits."

56. Paragraph 3.65 of the Landscape and Townscape SPD with reference to the Great Ouse Valley landscape character states: "Sensitive restoration of many gravel workings has enabled them to blend successfully into the landscape as nature reserves and fishing lakes becoming points of high landscape quality in their own right." The site also falls within the Great Ouse Valley Green Infrastructure Priority Area (see paragraph 3.68 of the Landscape and Townscape SPD).

57. Key characteristics of the Great Ouse Valley LCA include distinctive vegetation assemblages; the willow and poplar trees which flourish in the valley and increase its sense of identity and enclosure. These are complemented by reeds, rushes and sedges. The ecological value of numerous sites is recognised through their designation as Sites of Special Scientific Interest or County Wildlife Sites (including Meadow Lane Gravel Pits CWS).

58. The Great Ouse Valley introduces a wealth of wildlife into St Ives along the river corridor, additionally valued for its recreational opportunities with a long-distance footpath extending

the whole length of the area. Sensitive restoration of many gravel workings has enabled them to blend successfully into the landscape becoming points of high landscape quality. The lakes, linked by the river provide boating and canoeing opportunities along with fishing, walking and wildlife viewing. Key issues for the Great Ouse Valley landscape area looking forward include the protection of both its landscape and biodiversity benefits, including the use of native wetland trees to maintain the traditional vegetation of the area. Key issues for the Great Ouse Valley LCA looking forward include the protection of both its landscape and biodiversity benefits, including the use of native wetland trees to maintain the traditional vegetation of the area. Development proposals should promote opportunities for wildlife and conservation initiatives to support and enhance the area's biodiversity.

59. Policy LP3 of the Local Plan states a proposal within the Great Ouse Valley Landscape Character Area will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area. Policies LP11 (Design Context) and LP12 (Design Implementation) are not development strategy policies but are nonetheless relevant to the assessment below.

60. A Landscape & Visual Appraisal (by FPCR) dated November 2024 has been submitted with the application and reviewed by HDC's Landscape Officer. The methodology of the LVA is agreed and provides a thorough overview of the existing site, landscape character areas as defined by national and local guidance, landscape and nature conservation designations and public rights of way. However, the Landscape Officer contests elements of the LVA, primarily because it fails to account for the loss of trees through prior clearance works ahead of the submission of the application and it fails to address the significant potential for the habitat to recover rapidly which will impact greatly on the baseline, as presented by the LVA. It is acknowledged that the removal of trees/vegetation predates the application and did not require permission/consent from the District Council.

61. The Landscape Officer considers that the associated mature vegetation surrounding the lake is a key characteristic of the Great Ouse Valley LCA and provides its sense of identity and enclosure (contesting sections 4.17 & 4.18 of the LVA). Furthermore, Section 4.28 fails to acknowledge the habitat degradation which has taken place (apparent from publicly available aerial imagery) and the former landscape value of the site. Crucially, the Site and Immediate Context of the LVA fails to acknowledge a season's recovery and regrowth of trees and vegetation following clearance works (habitat degradation). The regrowth of scrub and trees through coppice regeneration and sucker regrowth is significant, emanating from an established rootstock which hold significant potential for woodland and scrub habitat regeneration. It is suggested that the viewpoints and site photographs within the LVA are contrived in that they fail to acknowledge the site clearance which has eroded the sense of identity and enclosure characteristic of the Great Ouse Valley LCA. If the vegetation is allowed to recover, the site would in a short number of years have a growing (re)association with the lake as an element of the wider mosaic of habitats, and would also regain its sense of identity and enclosure which is a key characteristic of the Great Ouse Valley LCA.

62. The tree removal outlined above has altered the character of the site especially when viewed from Hunts Sailing Club (viewpoint M in the submitted LVA). This is because a large number mature (assumed to be veteran) that lined the lake edge have been felled and this has opened up views across the application site which has resulted in the buildings at Meadow Park being more visible. Whilst these buildings are more visible, their scale and design with pitched roofs and dormers reduce the prominence of this built form and they appear within the background of this viewpoint. Furthermore, the vegetation adjacent to Meadow Lane on the southern boundary of the site and together with the undeveloped nature of the site still provides a green, tranquil edge to the lake and therefore makes a positive contribution to the landscape. Existing built form immediately surrounding the lake is limited to the Hunts Sailing Club building which is single storey and in terms of use it complements the recreational use of the lake. Due to the compatibility of the Sailing Club building and the lake, this modest built

form is appropriate within its setting. The remainder of the lake edges remain undeveloped, green and vegetated which contributes to the Great Ouse Valley LCA and the countryside character/setting.

64. The scheme comprises two separate 3 and 4 storey flat roof L-shaped buildings. The long arm of the buildings are 3-storeys measuring approximately 55 metres in length and positioned parallel with the lake edge and Meadow Lane. The two buildings would be separated by an approximately 17-metre-wide central communal space/entrance courtyard with parking located in front of the buildings. To the rear of the buildings along the lake edge, a pedestrian footpath, viewing deck and external seating area to the restaurant are proposed. There would also be a significant number of external balconies overlooking the lake. The development would introduce human activity on the lake edge which does not have a connection with the recreational use of the lake which would be at odds with the existing tranquil setting. Furthermore, it is considered that the proposed 3/4 storey buildings and associated hard landscaping, vehicular accesses, car parking and external lighting and would have a detrimental urbanising effect. The site has already lost its sense of identity and enclosure (a key characteristic of the Great Ouse Valley LCA) through removal of trees/vegetation as discussed above. The proposal would result in further harm through the introduction of built form which is of a scale, massing and design more akin to development in a town centre location in stark comparison to the existing Sailing Club building and the buildings at Meadow Park.

65. As a result of vegetation clearance on the site, including the removal of large trees, the proposed development would be highly visible and prominent in publicly accessible views from the A1096 (shared cycle/pedestrian path between the lake and the road, as well as transient views from vehicles), private views for members of Hunts Sailing Club (viewpoint M in the submitted LVA) and users of the wider lake. The submitted Landscape Masterplan (10571-TEP-XX-XX-DR-L-0001 Rev P01) proposes limited tree planting on the lake edge which would not soften or screen views of the proposed building which is of a scale and mass which is completely out of context with the existing character of the site. The proposed buildings would not complement or relate to the existing lake setting in terms of use or function (not being associated with the recreational use of the lake), nor would it protect the landscape value of the Great Ouse Valley LCA.

66. Existing hedgerow along Meadow Lane is to be retained with additional landscaping proposed however gaps in the hedgerow would remain and the access points would offer views into the site. Given the siting and scale of the buildings proposed, the development would be readily visible in views by users of the PRoW Ouse Valley Way Long Distance Path, Meadow Lane, and Meadow Park. This would significantly alter the perception of the north of Meadow Lane including the site as being part of the wider County Wildlife Site and the countryside.

67. In summary, it is considered the proposed introduction of 3-4 storey buildings and associated hard landscaping, vehicular accesses, car parking and external lighting would have a detrimental urbanising effect on an undeveloped site within the countryside. By virtue of its size, scale, massing and design the development would be out of keeping with and detract from the existing character of the site which is identified as having landscape and biodiversity value forming part of Great Ouse Valley LCA. For the reasons set out above, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP2, LP3, LP10, LP11 and LP12 of the Local Plan and paragraph 187 of the NPPF 2024.

68. Policy LP10 part (c) requires proposals to avoid giving rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others. Representations received by users of the adjacent lake have acknowledged the recreational value of the lake for sailing, swimming and paddleboarding. Concerns have also been raised

in relation to potential impacts on wind and the use of the lake for sailing. Consultation comments have been received from Sport England in objection and a representation has been received by the Royal Yacht Association (RYA).

69. It is considered that Policy LP10c) is relevant when assessing the impact on the recreational use of the lake as 'other impacts that would adversely affect the use and enjoyment of the countryside by others'. Furthermore, Paragraph 98 (c) of the NPPF 2024 states that decisions should guard against the unnecessary loss of valued recreational facilities and services and paragraph 103 sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

70. The RYA in their letter dated 24th January have explained in detail the potential implication of the proposed development on the users of the lake for sailing, specifically HSC, regarding the wind flows, including the sudden changes in wind speed and sudden changes in wind direction. The letter explains that due to the scale and siting of the development, this could destabilise the wind across the operating area of the lake, significantly reducing the area suitable for regular sailing and training activities. This of particular concern to the RYA as the location where training occurs is where the unpredictability of the wind results in much greater risk of injury. Whilst the proposed development would not physically reduce the size of the lake, the RYA consider that it could significantly reduce the effective operating area and reduce the space currently available for recreational activities including training and racing. Sport England advise that RYA is the National Governing Body in the case of sailing, and given their expert knowledge on sailing, Sport England support the concerns raised by RYA and object to the application in its current form. It has been recommended that the LPA consider whether a wind study is required by the applicant to demonstrate the impact of the development on the wind regime across the lake and whether any impacts could be mitigated.

71. The applicant has submitted a Wind Microclimate Assessment (not at the request of the LPA) to address the above. However, this has not been accepted by the LPA as there was insufficient time left within the agreed determination period to carry out the required reconsultation with Sport England, the RYA and other interested parties. The application has therefore been assessed based on the documents originally submitted with the application and it is considered that this is insufficient to demonstrate the potential implications on the users of the lake for sailing and wind flows. In the absence of this information, the proposal is contrary to Policy LP10c) and the NPPF 2024.

72. As per policies LP2 and LP10, a proposal for development in the countryside may be supported where it accords with the specific opportunities allowed for through other policies of the Local Plan. Paragraph 4.110 of the Local Plan sets out that this includes LP19 'Rural Economy', LP20 'Homes for Rural Workers', LP23 'Tourism and Recreation' and LP28 'Rural Exceptions Housing'. These limited and specific opportunities are not considered to be relevant to the proposal.

Provision of specialist housing

73. Paragraph 63 of the NPPF 2024 advises that planning policies should assess and reflect the size, type and tenure of housing needed for different groups in the community, including older people. The National Planning Practice Guidance (NPPG) has identified that the need to provide housing for older people is 'critical', given the projected increase in the number of households aged 65 and over. Furthermore, older people should be offered a better choice of accommodation to suit their changing needs in order that they can live independently for longer and feel connected to their communities.

74. Paragraph 7.25 of the Local Plan sets out that the need for appropriate housing for older people is expected to increase significantly up to 2036. Projected increases in the number of Huntingdonshire households comprising people aged 65 and over, evidenced in the Cambridge sub-region SHMA (2013), informs an indicative need in Huntingdonshire in the period 2016-36 for around 4,000 units of specialist housing for older people. There will also be an additional need for specialist housing for people aged under 65, increasing roughly in line with the overall population growth. Given the clear and substantial need for specialist housing for older people established in the Huntingdonshire Accessible and Specialist Housing Evidence Paper, development proposals will not be expected to provide additional evidence to demonstrate this need. Furthermore, the NPPG states that where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need (Paragraph: 016 Reference ID: 63-016-20190626).

75. The proposal would provide 86 retirement apartments, for which there is an identified need and current shortfall. Consequently, the proposed development would make a contribution to meeting the overall need for specialist housing within the District.

76. Policy LP26 states a proposal for a new residential institution or replacement or extension of an existing one (class 'C2') will be supported where:
e. it is easily accessible to shops, services, community facilities, public transport and social networks appropriate to the needs of the intended occupiers, staff and visitors;
f. the design meets or exceeds the standards set by the Care Quality Commission (or successors) regarding the safety and suitability of premises.

77. Paragraph 7.29 of the Local Plan within the supporting text for Policy LP26 states: The location and design of specialist housing are integral to making specialist housing an attractive option. Proposals should demonstrate that residents will have good access to local facilities, and how the development will be integrated with the surrounding community, for example by design of shared spaces and provision of ancillary facilities that complement local provision. Proposals for specialist housing should also demonstrate how the development contributes to an inclusive, mixed community, avoiding creating neighbourhoods with exclusively specialist housing provision.

78. Paragraph 7.31 goes onto state: While residents in care or nursing homes may be unlikely to leave the site unaccompanied, staff and visitors are likely to travel to and from such homes on a regular basis. It is therefore important that residential institutions are in locations with easy access to services and facilities. Locating residential institutions close to shops and services can also encourage residents to visit them, potentially with support from staff or visitors, thereby remaining more active. Proposals for residential institutions away from larger populations due to the specific needs of proposed residents will be considered on a case-by-case basis.

79. Initially, consideration needs to be given as to whether the proposal would fall within Use Class C2. The development comprises 45 No. one bedroom, 30 No. two bedroom, and 11 No. three bedroom self-contained apartments. The proposed communal facilities include a restaurant, coffee bar, residents' lounge, activities studio, hairdressing salon and treatment room, mobility scooter store, guest suite, gardens and care team offices/facilities.

80. The submitted 'Care Statement' sets out that all residents would be a minimum of 65 years old (unless otherwise agreed in writing with Huntingdonshire District Council) and in need of direct care and assistance with one or more aspects of daily living, unless they are the spouse or partner of such a person. Prospective residents would have their care needs assessed by means of completion of the two assessment forms contained in Appendix 1 and 2 of the submitted 'Care Statement'. Furthermore, all residents would be required to purchase 2 hours per week of non-regulated care as part of the service and wellbeing charge.

81. There have been a considerable number of appeal decisions and High Court cases considering whether older person specialist accommodation falls within Use Class C2 (residential institution) or C3 (self-contained specialist housing/dwellinghouses). From this, several factors can indicate a C2 use rather than C3 use such as:
- requiring an objectively-verifiable assessment of need upon entry/purchase;
- domiciliary care packages comprised at least 1½ hours of care per week;
- developments where the design of the proposals incorporated self-contained units of one type or another, along with a significant degree of communal facilities;
- a mandatory residential qualification is the requirement that residents are professionally assessed as in need of care 'packages';
- range of communal facilities to promote physical and mental well-being that are not found in general residential schemes;
- specific residential design alterations that are representative of accommodation aimed at the elderly in a care environment rather than a conventional residential environment.

82. From the information provided as part of the application, it is considered that the eligibility requirements are consistent with those detailed above. It is however necessary to ensure that the eligibility requirements, minimum care package, communal facilities, and other such considerations which are relevant, are secured in accordance with the submitted 'Care Statement' as part of the S106 Agreement to ensure the development would fall within Use Class C2.

83. In terms of Policy LP26 e), the site is physically well related to the town centre which offers a wide range of services and facilities, however it is separated by the A1096 which makes integration and accessibility to services more challenging especially considering the proposed use of the site for specialist housing means having services and facilities within accessible distance via safe routes is even more critical.

84. In terms of existing infrastructure, there is a shared pedestrian/cyclist footway on the southern side of Meadow Lane that continues east from Harrison Way/Meadow Lane roundabout connecting to the Park and Ride which is approximately 360 metres from the proposed development. The bus services which can be accessed from the park and ride include Bus Service A – St Ives to Trumpington and Bus Service B – Huntingdon to Cambridge. There is an existing footpath on the north side of Meadow Lane up to the application site and there are existing opportunities to cross Harrison Way, comprising dropped kerbs and pedestrian refuge islands across the northern and southern arms of Harrison Way at its roundabout junction with Meadow Lane, with tactile paving provided at the southern crossing. Harrison Way is a main route in and out of St Ives from the (A1307/old A14) for access to St Ives Town Centre/Market Square, residential areas and retail/business parks on the east side of St Ives. As such, it experiences high volumes of traffic throughout the day, particularly at this roundabout near the application site. Meadow Lane is used by vehicles accessing the Park and Ride facility as well as larger heavy vehicles associated with the industrial uses at the eastern end of Meadow Lane. It is considered that the existing uncontrolled crossing points on Meadow Lane and Harrison Way would be extremely difficult for older persons and those with physical impairments to navigate.

85. To address the above, the applicant proposes to improve existing pedestrian connectivity. A 2-metre-wide footway is proposed on the western access point which would connect to the existing footway on the northern side of Meadow Lane. As part of the development proposals, the existing uncontrolled pedestrian crossing on Meadow Lane, would be upgraded to include a 2-metre-wide pedestrian refuge island. A controlled pedestrian crossing is proposed on the southern arm of the Harrison Way/Meadow Lane roundabout junction. This would replace the existing uncontrolled pedestrian crossing on this arm of the roundabout, which would be removed in its entirety (dropped kerbs and tactile paving) and the pavement re-instated on both sides of Harrison Way. The existing 2m wide footway on the western verge of the

southern arm would be extended further south to the location of the proposed controlled pedestrian crossing.

86. Consultation comments from the Highway Authority will be discussed in greater detail later within this report, however they have advised that a stage 1 safety audit is required prior to determination. Furthermore, the Transport Assessment Team are not satisfied at this stage that the controlled crossing would not have adverse effects on the capacity of Harrison Way/Meadow Lane roundabout and Harrison Way. Given the context outlined above, it is crucial that any highway improvements related to the proposed development would not impact the capacity and flow of traffic on this busy road and roundabout.

87. Improvements to the existing pedestrian footpaths and crossings to and from the site are essential to ensure the town centre is easily accessible to meet the needs of the intended occupiers. Whilst the site would be connected to the existing footpath/cycle path running north towards St Ives Business Park, this is not an easily accessible connection to the retail park beyond due to the need to cross the A1123 and due to the distance to reach these services/facilities.

88. Having regard to the nature of the road network and the lack of existing controlled crossing points and footways, this would be difficult for older persons and those with physical impairments to navigate. The application has insufficient evidence that the proposed controlled crossing and footpath improvements are acceptable solutions for the proposed development to be well connected to and **easily** accessible to shops, services, community facilities, public transport and social networks appropriate to the needs of the intended occupiers and other users of the development, contrary to Policies LP2, LP16 and Policy LP26e).

*Affordable housing provision

89. Policy LP24 states "*in order to assist in meeting the identified local need for additional affordable homes, a proposal which includes housing development will be required to provide a range of affordable housing types, sizes and tenures… The affordable housing provision may include specialist or supported housing where an identified need exists*." Policy LP24 states a proposal will be supported where: a. it delivers a target of 40% affordable housing on a site where 11 homes or 1,001m2 residential floorspace (gross internal area) or more are proposed.

90. The proposal would constitute housing development, comprising 86 apartments for people aged 65 and over and equates to 9653sqm of residential floor space. Whilst the proposal is for Use Class C2 Residential Accommodation with Care, Policy LP24 does not use the terms "housing development", "homes" or "residential floorspace" as a term restricted to the Use Class C3 and does not preclude Use Class C2. The policy makes no reference to the Use Classes Order.

91. Policy LP26 is silent on the requirement for affordable housing in relation to residential institutions (Class C2), however clearly sets out that self-contained specialist housing (Class C3) will be supported where, amongst other things, it incorporates a mix of tenures including affordable homes in accordance with policy LP 24 'Affordable Housing Provision'. The reasoning text for Policy LP26 at paragraph 7.28 also states that developers are encouraged to seek pre-application advice to establish whether their proposal may be classified as C2 or C3 due to the implications for the provision of affordable housing and other developer contribution matters. However, Policy LP26 and its reasoning text **does not** explicitly preclude the provision of affordable housing for the development of residential institutions (Class C2).

92. The proposal would constitute housing development, comprising 86 self-contained apartments for people aged 65 and over and equates to 9653sqm of residential floor space. Policy LP24 applies to all housing developments and the proposal exceeds the thresholds, therefore this proposal would require the provision of affordable housing in accordance with Policy LP24 of Huntingdonshire's Local Plan to 2036.

*Residential Amenity

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

Daylight/sunlight to habitable rooms

94. The assessment includes a Vertical Sky Component (VSC) and No Sky Line / Daylight Distribution (NSL) methods of assessment to determine the level of skylight and the Annual Probable Sunlight Hours (APSH) method of assessment to determine sunlight levels as described within the BRE Guide Site Layout for Planning for Daylight and Sunlight A Guide to Good Practice 2022. The tests have been carried out for all of the north and northwest facing apartments in Buildings 1 and 2.

95. The results show that of the 124 rooms assessed for Spatial Daylight Autonomy (sDA), 98 (79%) would fully accord with the recommended target values for their room use. Rooms that do not meet the recommended criteria would typically exceed the minimum recommendations achieving their target lux to 90% of the area on average.

96. The submitted sDA Daylight Contours (Appendix 4) shows the majority of rooms receive a good distribution of daylight throughout most of the room, particularly within bedrooms and living / dining rooms. Rooms that receive low levels of daylight distribution are limited to the ground floor kitchens on the northwest facing elevation (4 units) and a ground floor bedroom and first, second and third floor kitchens (5 units) in Building 1 and a first and second floor kitchen, Living / Dining room and bedroom (4 units) within Building 2. This is a result of the deep plan form of the units where the kitchens are placed furthest form the windows to maximise daylight within the living / dining rooms and bedroom. The kitchens also have smaller window sizes in order to accommodate cabinetry which also impacts daylight distribution.

97. In terms of sunlight, all of the rooms assessed are north or northwest facing and therefore have inherently lower sunlight levels due to their orientation. This combined with the proposed deep plan room layouts means that sunlight levels are lower for the units assessed. As such, with due consideration to the flexibility with which the BRE guide is intended to be used, the daylight and sunlight within the proposed development is considered acceptable.

Noise

98. A Noise Impact Assessment (NIA), dated October 2024, Version 1.0 has been submitted in support of the application and reviewed by HDC's Environmental Health Officer.

99. The above report makes no reference to any proposed external plant even though there is a kitchen proposed. External plant has the potential to cause a noise impact and therefore a condition is deemed necessary should permission be granted to secure details of external plant prior to occupation.

100. The NIA highlights the requirements of Pro PG Part 2, Element 1 regarding Good Acoustic Design, however there does not appear to be any attempt to implement good acoustic design as only façade attenuation and trickle vents are proposed. HDC's Environmental Health

Officer has raised an objection on the grounds of adverse noise impact on future residents as there is insufficient information to demonstrate sound levels will be mitigated to an acceptable level. It is not considered that the Pro PG has been adequately followed, or that sound levels have been mitigated and reduced to a minimum.

101. To achieve a high level of amenity in accordance with Policy LP14, adequate noise levels should be achieved with windows partially open in order to ensure that residents do not have to keep their windows closed. Where this is not possible and developers rely on closed windows to achieve suitable internal noise levels, alternative ventilation may be considered by the LPA as a last resort. Full justification demonstrating consideration of alternative mitigation measures such as the design, distance, acoustic screening, orientation of buildings, locating additional windows on quieter facades and screening of sensitive rooms/areas by non-sensitive ones etc, is required to confirm the need for alternative ventilation has been minimised as far as practicable. Good acoustic design measures within ProPG Planning & Noise should be followed. Where alternative ventilation is required full details of the system will need to be supplied, demonstrating that it can achieve air changes comparable to an open window, therefore occupants of all habitable rooms will require a suitable ventilation system which achieves 2 - 4 Air Changes per Hour. Trickle vents are considered to only provide background ventilation and would not be deemed sufficient to provide adequate ventilation for summer cooling. Other mitigation measures to enable internal guidelines to be met with windows open include acoustic plenum windows which may provide sufficient attenuation whilst allowing windows to be open, which could negate the need for alternative/mechanical ventilation in habitable rooms.

102. In summary, insufficient information has been submitted to demonstrate sound levels could be mitigated to an acceptable level and in the absence of this, the proposal is unlikely to achieve a high standard of amenity in accordance with Policy LP14 of the Local Plan.

Health

103. Policy LP29 states a proposal for large scale development will be supported where it can be demonstrated that the design of the scheme has been informed by the conclusions of a rapid Health Impact Assessment. A Rapid Health Impact Assessment Matrix completed 12/11/2024 has been submitted with this application.

104. The submitted HIA has set out the broad principles to be adopted in promoting a healthy community and principles to inform the design phases. It is considered the details provided are sufficient at this stage to confirm the development is capable of coming forward in a manner that would meet the aims of the policy. At reserved matters stage, it should be demonstrated how the principles identified in the rapid HIA have been taken into account and incorporated into the development. Subject to this, the proposal is considered to comply with Policy LP29 of the Local Plan.

Contamination, Air Quality and Odour

105. Policy LP37 of the Local Plan set out the Council's approach in relation to ground contamination and groundwater pollution. The application is supported by a Phase I Geo-Environmental Assessment Report (produced by Brownfield Solutions Ltd) dated May 2024. This has been reviewed by the Environmental Health Officer who agrees with the findings and the recommendation for a Phase 2 Intrusive Ground Contamination Risk Assessment. A condition is therefore recommended to secure this in the interests of protecting the health impacts of workers, future occupiers and to protect the environment. Subject to such a condition, the proposal is considered to accord with policy LP37 of the Local Plan.

106. Policy LP36 of the Local Plan sets out the Council's approach in relation to how development proposals affect and are affected by air quality. Paragraph 192 of the NPPF 2023 sets out

that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and the cumulative impacts from individual sites in local areas. The Environmental Health Officer broadly agrees the conclusions of the Air Quality Screening Assessment dated 10th October 2024 (version 2.0) and supports the proposed mitigation within Sections 5.1.17 – 5.1.19 for the construction phase and section 5.2.16 for the operational phase. A condition is recommended to secure a Construction Environmental Management Plan which includes (but not be limited to) mitigation measures within Sections 5.1.17 – 5.1.19 of the above-mentioned report as well as lighting, noise, vibration and other pollution control measures. A further condition is recommend requiring additional information to demonstrate how the measures within Section 5.2.16 relating to the application of good design and good practice measures have been considered and how these would be implemented. Subject to the recommended conditions, the proposal is considered to comply with the aims of Policies LP14 and LP36 of the Local Plan and the NPPF 2024.

107. Policy LP14 set outs of a proposal will be required to ensure that predicated adverse impact from odour will be made acceptable. The proposal includes a commercial kitchen which may require kitchen extraction equipment and therefore a condition is recommended to require details of any kitchen extraction equipment to ensure there would be no adverse impact on residents, in terms of odour and noise.

108. The Environmental Health Officer does not consider that this as a significant issue in terms of amenity for future occupants in relation to the recycling centre given the distance and direction between the proposed development and the recycling centre. It is therefore not considered that there would be unacceptable odour impacts to the development, in accordance with Policy LP14.

*Transport and Highway Matters

109. Policy LP16 of the Local Plan looks to ensure that developers fully consider how the opportunities and impacts of the range of travel and transport modes are addressed in their proposals. Policy LP17 of the Local Plan sets out that a proposal will be supported where it incorporates appropriate space for vehicle movements, facilitates accessibility for service and emergency vehicles and incorporates adequate parking for vehicles and cycles.

110. The application is supported by a Transport Assessment (prepared by Prime Transport Planning) dated November 2024. The Transport Assessment Team (TA Team) at Cambridgeshire County Council have raised a number of concerns in relation to the submitted Transport Assessment, including but not limited to the modelling used, need for pedestrian counts, requirement for a multi-model trip assessment using TRICS and the need for traffic count data. In addition, concern has been raised in relation to the proposed controlled crossing at Harrison Way and how this would impact the capacity of the Harrison Way/Meadow Lane roundabout and Harisson way will be affected.

111. The Highways Development Management Engineer at Cambridgeshire County Council has advised that as the proposal incorporates a new controlled crossing and new vertical feature within the existing adopted highway, a stage 1 (in principle) safety audit is required. The Highway Authority has recommended that the application is not determined until this process has been completed to ensure that proposed is safe and deliverable.

112. In relation to the proposed access arrangements, two accesses are proposed from Meadow Lane and the Highway Authority have advised that the eastern access eastern splay falls below the required standard for vehicle-to-vehicle visibility.

113. In terms of vehicle parking provision, the application is supported by a parking statement by Adlington retirement living (Dated November 2024). The proposed 86 apartments would be served by 52 spaces (including 4 accessible spaces) which equates to a parking ratio of 60%.

The parking statement sets out that due to the restrictions to occupation for only those with assessed care and support needs gives a resultant average age of resident of over 80, and many of the residents are likely to have have mobility/dexterity/vision problems or conditions which prevent them from driving and running a car. These are factors which indicate a low level of car ownership. There would be a maximum of 8 staff on site at any one time and visitor parking demand is likely to be during evenings and weekends. It is considered that the proposal incorporates a sufficient level of vehicle parking to serve the needs of the development.

114. The submitted parking statement states the proposals provide space for 10 cycle parking spaces (6 externally & 4 internally in the mobility scooter stores). The external cycle parking comprises 3 cycle stands and the internal cycle parking would be within the building's mobility store. The proposed level of cycle parking provision is considered acceptable to meet the requirements of residents, staff and visitors.

115. Paragraph 116 of the NPPF 2024 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. In the absence of the results of a stage 1 safety audit and the recommended amendments to the Transport Assessment, it is considered that the application as submitted does not include sufficient information to properly determine the highway impact of the proposed development and to demonstrate that it would not be prejudicial to the satisfactory functioning of the highway. The proposal would therefore be contrary to Policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036.

*Impact on Heritage Assets

116. Policy LP34 of the Local Plan states that great weight and importance should be given to the conservation of heritage assets.

117. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that 'with respect to any buildings or other land in a conservation area… special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

118. The site lies to the east of Harrison Way on the edge of a lake created from modern gravel extraction. Harrison Way is built over the line of a former railway track and marks the eastern boundary to the St Ives Conservation Area. The lake has no historic association with St Ives as it was created from the final phase of gravel extractions started during WW2 which consumed a large area of farmland between the town and Holywell village. Harrison Way is a modern urban throughway that dislocates the historic town from its former countryside setting.

119. The development could be visible from the northeast corner of the Cattle Market car park and the junction with Meadow Lane but the views are likely to be oblique and dominated by modern development (The Chestnuts and The Firs). Intervening planting should almost completely screen the development from the conservation area. The submitted Heritage Statement confirms that there will be limited inter-visibility between the development and the conservation area. The proposed development is unlikely to have a negative impact on the significance of the St Ives Conservation Area.

120. In terms of archaeology, the Historic Environment Team at Cambridgeshire County Council have been consulted and they have indicated the proposed development lies in an area of archaeological potential to the northeast of the historic medieval core of St. Ives (Cambridgeshire Extensive Urban Survey 2015). The site is bounded to the north and east

by a gravel quarry, now forming a lake. Investigation of the overburden extracted from the quarry has found evidence for Saxon burials, dated from a find of a square headed Saxon brooch (Cambridgeshire Historic Environment Record reference. 01489). A large number of find spots have been reported along Meadow Lane and from the quarry itself including a Bronze Age spear (CHER ref. 11857), Iron Age to Roman pottery (CHER ref. 03879), a Paleolithic handaxe (CHER ref. 10485a) and Bronze Age to Neolithic flint work (CHER ref. 00519B). Archaeological investigations undertaken to the east have found evidence for Neolithic features buried under alluvial layers, indicative of a causewayed enclosure (CHER ref. MCB12446) and an Iron Age pit sequence (CHER ref. 10485F).

121. Due to the archaeological potential of the site, a further programme of investigation and recording is required in order to provide more information regarding the presence or absence, and condition, of surviving archaeological remains within the development area, and to establish the need for archaeological mitigation of the development as necessary. It is therefore recommended that the site should be subject to a programme of archaeological investigation secured through the inclusion of a condition. Subject to this, the proposal would comply with Policy LP34 of the Local Plan.

*Flood Risk and Drainage

122. Policy LP5 of the Local Plan sets out that a proposal will only be supported where all forms of flood risk have been addressed. Furthermore, Policies LP6 and LP15 set out the Council's approach to waste water and surface water management.

123. Concerns have been raised by neighbours, St Ives Town Council and Needingworth Parish Council in relation to existing and future flood risk to the site and surrounding area.

124. A Flood Risk Assessment Report by Floodline Consulting dated November 2024 has been submitted with the application and a subsequent Flood Risk Technical Note dated 6th February.

125. The majority of the site is located in Flood Zone 1 on the Environment Agency's Flood Map for Planning and the Strategic Flood Risk Assessment (SFRA 2024), however some of the northern part of the site adjacent to the lake is within Flood Zones 3a and 3b. The SFRA 2024 also shows there is low surface water flood risk on Meadow Lane (outside the application site boundary).

126. The Environment Agency has raised no objection, however has raised concerns in relation to the availability of a safe access and means of escape. The EA has advised the data from their Risk of Flooding from Rivers and the Sea (Figure 1 in the applicant’s technical response) is not suitable for assessing flood risk for planning purposes and information available from the EA’s Lower Ouse model should be used to the assess the safety of the access/escape route.

127. The EA’s flood map for planning and the SFRA 2024 shows that part of the access/escape route (outside the application site boundary) is in Flood Zones 2 and 3. The means of escape and access within the site boundary is entirely within Flood Zone 1, however the site is surrounded by areas at higher risk of flooding. Paragraph 175 of the NPPF 2024 states that the sequential test is only required where an FRA demonstrates that no built development within the site boundary, including access or escape routes would be located on an area that would be at risk of flooding from any source, now and in the future. The applicant has demonstrated that no built form or access/escape within the site boundary would be on land at risk of flooding, as such it is deemed that the sequential test is not required.

128. Notwithstanidng the above, the applicant has stated that a Flood Warning and Evacuation Plan will be produced as precautionary measure and should planning permission be granted,

a pre-occupation condition is recommended to secure the submission and approval of this in consultation with HDC's Emergency Planner.

129. In terms of surface water and foul drainage, the latest drainage strategy by JPS (dated February 2025) has been considered. It is proposed to discharge foul flows from the site to the existing 1200mm diameter public combined flow sewer to the south of the site via an existing manhole. The invert level and exact location of the sewer and manhole are unknown at this stage and therefore, should permission be granted a condition is recommended to require the detailed drainage design. Anglian Water have confirmed that due to planned investment within the St Ives catchment the flows from the development can be accommodated.

130. It is proposed to discharge surface water runoff from the roof areas of the two buildings to St. Ives Lakes to the north of the site via a new headwall. Attenuation storage will be provided to restrict surface water runoff generated across roofs and hardstanding from the development site. The Local Lead Flood Authority has raised no concerns with this approach in their comments dated 13th March, however they have objected on the basis of there being no maintenance strategy. The applicant subsequently submitted a maintenance strategy however there was insufficient time to reconsult the LLFA prior to the agreed determination date.

131. Concerns have been raised by the Parish and Town Councils and other representations in relation to the proposed surface water discharge arrangements into the lake and potential pollution. An agreement/consent will be required from the landowner of the lake. Whilst the LLFA agrees to the proposed strategy, ultimately as the owner of the lake is taking on the discharge they would also have to agree. In terms of potential water pollution, it is considered that this would not be significant as the surface water runoff would be generated from roofs and hardstanding, and the lake already receives runoff from a variety of other sources.

132. On the basis that a maintenance strategy has not been reviewed or been accepted by the LLFA, this warrants a reason for refusal as it has not been demonstrated that the drainage system can be suitably maintained so as to not increase flood risk contrary to Policy LP15 of the Local Plan.

*Biodiversity and Ecology

133. Policy LP30 of the Local Plan requires proposals to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated, and all possible efforts must be taken to avoid adverse impacts. Paragraphs 187 d), 188 and 192 – 195 of the NPPF 2024 deal with biodiversity and habitats.

134. The application is supported by the following documents:
- Statutory Biodiversity Net Gain Report
- Ecological Appraisal, received 03/12/2024
- BNG – Statutory Biodiversity Metric

135. The assessment below incorporates comments from HDC's Ecology Officer and Landscape/Biodiversity Officer.

<u>Impact on County Wildlife Site</u>

136. The site is identified as a core site within the Great Ouse Valley Habitat Network, a Priority Natural Landscape for Huntingdonshire. Important habitats identified in this area include lowland floodplain meadows, floodplain wetland mosaics, reed swamp, wet woodland, open water lakes and river backwaters. 40% of the Ouse Valley is already nature-rich land but

much of it would benefit from better management or habitat restoration to reach its full nature potential. Planning Practice Guidance (PPG) advises that in complying with its duty to consider how they can conserve and enhance biodiversity (under Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021)), all public authorities must "have regard" to any relevant Local Nature Recovery Strategy. Furthermore, the Local Nature Recovery Strategy is an evidence base which contains information that may be a 'material consideration' in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication (PPG paragraph 047).

137. The proposed development within a core site of the Great Ouse Habitat Network would represent a backstep in maintaining and enhancing networks of habitats. HDC's Landscape and Biodiversity Officer has advised that habitat regeneration at the site as of January 2025 has shown that there is a significant potential for the regeneration of a valuable habitat for wildlife.

138. As previously set out, the site is part of the wider Meadow Lane Gravel Pit County Wildlife Site. This is a non-statutory designation used to identify high quality wildlife habitats in a county context. The reason for the designation is that it has passed relevant selection criteria which seek to apply concrete definitions and local thresholds to standard concepts of ecological evaluation such as diversity, rarity, size and typicalness. Section 4.4 of the submitted Ecological Appraisal states assumes that the proposed development will not impact upon the features for which the CWS is notified because there are no habitat types/features within the site boundary. However, the site does contain one pollard willow as per the submitted Arboricultural Assessment and other habitat types and qualifying criteria to strongly support the wider CWS ecological status. Furthermore, despite the degradation which has taken place and reduced in part the qualifying criterion relating to 1.h.i. Pollard willows, the site has a significant potential to continue to provide a high-quality wildlife habitat for the foreseeable future. The proposed development of the site would inherently result in further degradation of habitat and vegetation and would not enable the habitat to regenerate.

139. The proposed developments include a small horticultural area and landscape management. It is likely that these would introduce pesticides and herbicides to the site and there is potential for leaching and run-off into the soil and adjacent waterbody which could have considerable impact on the waterbody's vegetation and invertebrate communities, potentially damaging the feature for which the CWS is designated. This is contrary to Policy LP30 of the Local Plan which states that a proposal will not be supported if potential impacts would lead to the deterioration of water body ecological status/potential.

140. Paragraph LP30 c) of the Local Plan states a proposal will only be supported where a protected species, a priority habitat or species, a site of local or regional importance, the achievement of water body good ecological potential, or the biodiversity value of the proposed development site as part of the wider network would be affected, the need for and the benefits of the proposal must clearly outweigh the assessed impacts. The assessment carried out by HDC's specialist officers concludes that the development endangers the aforementioned assets, the benefits of the proposal fall to be considered within the planning balance.

Impact on Protected Species

141. The site is of great importance for the foraging and commuting of bats with the submitted surveys showing the site supports 11 of the 12 bat species present in Cambridgeshire (paragraph 3.25 of the Ecological Appraisal). The Ecological Appraisal at paragraph 4.29 states "In terms of mitigation for the site, site design should aim to enhance existing commuting corridors via creation of high-quality linear features and sensitive lighting strategies." It is considered that higher quality linear habitats then those proposed already

existed on site prior to clearance and the proposed 'enhancements' (creating linear features and planting night-scented species) would constitute a loss of commuting and foraging habitat from the site relative to the pre-clearance levels. In addition, sensitive lighting strategies are not considered to be an enhancement. They are a compromise that aims only to limit the degradation caused by lighting to nocturnal habitat (i.e. bat commuting, foraging, and roosting habitat). Any implemented lighting scheme, no matter how sensitive, will cause unacceptable harm to the nocturnal species of the County Wildlife Site. The LPA has a legal obligation to consider whether bats are likely to be affected by the proposed development. Insufficient information has been submitted to demonstrate that light spill from internal elements of the development alongside any required external lighting would not have an adverse impact on protected species particularly bats contrary to Policy LP30 of Huntingdonshire's Local Plan to 2036 and Regulation 43 of The Conservation of Habitats and Species Regulations 2017 (as amended).

Biodiversity Net Gain

142. Within Schedule 14 of the Environment Act, measures have been included allowing LPAs to take note of any habitat degradation or deliberate destruction undertaken on a site since 30th January 2020, and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. As part of the planning application the applicant must provide a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
    - a statement to the effect that these activities have been carried out;
    - the date immediately before these activities were carried out;
    - the pre-development biodiversity value of the onsite habitat on this date;
    - the completed metric calculation tool showing the calculations, and
    - any available supporting evidence of this

143. There are special provisions for establishing the pre-development biodiversity value of onsite habitat when loss or impact to habitats (or 'degradation') has occurred prior to the submission of a Biodiversity Gain Plan. This is in order to discourage the deliberate degradation of existing onsite habitats to reduce the pre-development biodiversity value.

144. If there has been degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it. This requirement must be applied to the calculation of pre-development biodiversity value in the metric tool, and the Biodiversity Gain Plan template asks for information regarding whether there has been prior habitat degradation.

145. The baseline biodiversity assessment therefore needs to account for all habitat removed since 30th January 2020 and HDC's Ecology Officer considers that the proposal does not correctly account for the degradation. Concerns have been raised with several baseline conditions and habitat types including woodland, bramble scrub, other neutral grassland and tall forbs. Furthermore, the habitat clearance resulted in the loss of a mature treeline within the woodland which dates to the 1800's which may have attained veteran status which is recorded as irreplaceable habitat in the Statutory Biodiversity Metric User Guide. The proposal has therefore been found to conflict with Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990.

Summary

146. Whilst habitat degradation has occurred prior to the submission of the application, it is considered that if it is left to self-restore, the site would be able to recover and would again be able to support a broad range of high value species at a strategically significant site (CWS and Great Ouse Valley Habitat Network). The proposed development represents a direct threat to the recovery of this habitat and will eliminate the opportunity for protected and other species to recolonisation the site. As such, ecological harm caused by the proposed development is also considered in terms of the loss of the sites future capacity to support nature.

147. The clearance carried out on site has resulted in significant changes to the biodiversity value of the site. Based on the specialist comments from the Landscape/Biodiversity and Ecology Officers, the submitted baseline biodiversity assessment does not account for all habitat removed and appropriate consideration, using a precautionary approach, of the preclearance biodiversity value of the site has not been applied. Insufficient information has therefore been provided to demonstrate that the development would provide the BNG set out within the metric supplied.

148. The development therefore conflicts with the NPPF 2024 and Policies LP30 of the Local Plan which seeks to minimise impacts on and provide net gains for biodiversity, protects priority species and protects and enhances habitats and ensures any adverse impacts are avoided, or if unavoidable, are appropriately mitigated.

*Impact on Trees and Woodland

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

150. An Arboricultural Assessment (prepared by FPCR, dated October 2024) has been submitted with the application. The information contained within the Arboricultural Impact Assessment and Tree Survey, proposes a limited amount of work will take place in proximity to the retained trees. It is suggested that these will be fenced off as per British Standards BS5837:2012 with protective fencing installed prior to the commencement of work, and located to protect the RPA Root Protection Area) of each tree. This is mostly achieved by completing the majority of works in the central and southern end of the site, leaving a band of trees around the eastern and northern perimeter. The location of the fencing, and encroachments into the sensitive rooting zones is minimised to an acceptable level in this way.

151. However, this information is based upon the Arboricultural Survey which makes no mention of the above ground site clearance that had already occurred in March 2024. Even with much of the visible above ground vegetation removed, a vigorous seed bank and existing root structure has resulted in the rapid redevelopment of vegetative cover. The Arboricultural Officer recommends that the current regeneration is left in order to partially compensate for the degradation and loss which has occurred on site. It is anticipated that the regenerative growth would provide important habitat and ecological services for many decades to come. Some replanting may also be appropriate. It is not known how many individual trees were removed, or whether they were veteran trees like the other large Willow which remains on the site, however their presence and amenity is acknowledged.

152. As previously mentioned, the removal of trees predates the application and this did not require permission/consent from the District Council as the trees were not covered by a Tree Protection Order or within a Conservation Area. Policy LP31 clearly sets out that where loss to trees/woodland cannot be minimised or mitigated, alternative measures such as

reinstatement of features, additional landscaping, habitat creation or tree planting will compensate for the harm and can be implemented and established before development starts. If permission were to be granted, suitable replacement tree/woodland planting to compensate for the loss of the regenerative growth should be provided within the red line or blue line to accord with Policy LP31 of the Local Plan in this regard.

*Planning obligations

153. Statutory tests set out in the Community Infrastructure Regulations 2010 (Regulation 122) require that S.106 planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. S.106 obligations are intended to make development acceptable which would otherwise be unacceptable in planning terms. The following contributions have been requested by consultees or identified as required in accordance with the adopted Developer Contributions SPD, as amended.

164. Community Infrastructure Levy (CIL): The development will be 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.

165. Age and care package: A planning obligation requiring that the development is only occupied by residents who are in need of at least 2 hours of personal care a week and that those residents are aged 65 years are older, is necessary to ensure that the development functions as specified in the description of development.

166. Biodiversity Net Gain: The proposal is required to deliver a mandatory minimum 10% Biodiversity Net Gain. As set out above, the submitted baseline biodiversity assessment does not account for all habitat removed and appropriate consideration, using a precautionary approach, of the preclearance biodiversity value of the site has not been applied. Insufficient information has therefore been provided to demonstrate that the development would provide the BNG set out within the metric supplied. Notwithstanding this, if planning permission was granted BNG and associated monitoring fees would be secured by way of S106 agreement.

167. Residential Wheeled Bins: Policy LP4 of the Local Plan to 2036 relates to provision for infrastructure needs, including waste recycling facilities and Part H of the SPD refers to Residential Wheeled Bins. If the applicant intends to use the Council's waste collection service, as per paragraph H.13 of the Developer Contributions SPD, flats and apartments will be calculated on the basis of 3 communal bins per 8 properties. The 2023/24 cost per communal bin is £669.00. 86 apartments would require 32 communal bins.

168. East of England Ambulance Service: A developer contribution (CIL/S106) has been requested for the sum of £15,068 towards "A new purpose-built Huntingdon Hub would hold a maximum of 35 ambulances and 4 rapid response vehicles. Each ambulance requires 78.46m2 GIA at a cost of £5,167 per m2. Ambulances would start and finish from the Hub, travelling to nearby ambulance response posts/stations to provide additional emergency ambulance services to meet population growth arising from this development."

169. It falls to be considered whether the contribution request meets the Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and paragraph 58 of the NPPF 2024 which states that planning obligations should only be sought where they are:
a) necessary to make the development acceptable in planning terms;
b) directly related to the development; and
c) fairly and reasonably related in scale and kind to the development.

170. It is acknowledged that the proposal would increase the need for emergency services and is therefore related to the development. However, the contribution requested would not cover

the cost of a new purpose-built Huntingdon Hub and is considered too general. It is not deemed that the request is necessary to make the development acceptable in planning terms.

171. Affordable Housing: Discussions have not been held with regards to the provision of affordable housing in accordance with the requirements of Policy LP24. Affordable housing (at least 40%) should be provided on-site as part of the development or a commuted sum for off-site provision. This would need to be secured through a S106 agreement.

172. If the application were to be recommended for approval, a S106 agreement would need to be completed to secure the above contributions that officers have deemed acceptable and that meet the CIL compliance tests.

*Conclusion and Planning Balance:

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

174. The application site is not considered to be easily accessible to services and facilities to meet the needs of the intended occupiers (over 65s in need of care) or capable of integration with the surrounding community having regard to the nature of the existing road network, lack of safe pedestrian crossing points and connections contrary to Policy LP26e) of the Local Plan.

175. The proposed introduction of 3-4 storey built form on this undeveloped site within the countryside would have a detrimental urbanising effect and it would erode the existing green character of the site and its contribution to the tranquil setting of the lake. By virtue of its size, scale, massing and design the development would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area which has landscape and biodiversity value. Therefore, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP3, LP10, LP11 and LP12 of the Huntingdonshire's Local Plan to 2036 and the NPPF 2024.

176. Furthermore, insufficient information has been provided in relation to impact on the recreational use of the lake and wind flow, noise, highways, surface water drainage maintenance, biodiversity and protected species.

177. The collective harm arising from the development identified above is afforded substantial weight.

178. The provision of housing, and specifically to address an accepted identified need for older persons, would contribute to the supply of housing is afforded significant weight. However, in the context of the proposed development on this site and the concerns raised on lack of accessibility to services and facilities, this benefit carries reduced weight in the overall planning balance.

179. The economic spending relating to the construction of the development and future occupiers spending in the local economy would accord with the NPPF, as would the construction jobs that would flow from the proposal which is afforded moderate weight.

180. It is noted that not all proposed developments are entirely without harm or entirely without benefit. Therefore, in reaching a recommendation on the application, the potential harm of the development has been considered against the benefits of the proposed development. Different weight has been given to each material consideration to form the overall planning

balance, notwithstanding that insufficient information has been provided on some matters to fully consider. It is considered that the identified demonstrable harm resulting from the proposed development would not be outweighed by the above benefits. Having regard to all relevant material considerations, the proposed development would be in conflict with policies of the development plan, read as a whole, and therefore planning permission should not be granted.

Recommend refusal for the following reasons:

1. The application site is not considered to be easily accessible to services and facilities to meet the needs of the intended occupiers (over 65s in need of care) or capable of integration with the surrounding community having regard to the nature of the existing road network, lack of safe pedestrian crossing points and connections. The proposal is therefore contrary to Policies LP2 and LP26e) of Huntingdonshire's Local Plan to 2036.

2. The proposed introduction of 3-4 storey, built form on this undeveloped site within the countryside would have a detrimental urbanising effect and it would erode the existing green character of the site and its contribution to the tranquil setting of the lake. By virtue of its size, scale, massing and design the development would be out of keeping and detract from the wider Great Ouse Valley Landscape Character Area and Great Ouse Valley Green Infrastructure Priority Area which has landscape and biodiversity value. Therefore, it is considered that the proposal would have an adverse impact on the landscape character and would fail to recognise the intrinsic character and beauty of the countryside, contrary to Policies LP3, LP10, LP11 and LP12 of the Huntingdonshire's Local Plan to 2036 and the NPPF 2024.

3. Insufficient information has been provided to demonstrate there would not be an impact on the users of the lake for recreation in terms of impacts on wind flows. As such, the proposal could result in adverse impact on a valued recreational facility and it would adversely affect the use and enjoyment of the countryside by others. The proposal is therefore contrary to Policy LP10c) and Paragraph 98 (c) of the NPPF 2024.

4. Insufficient information has been provided to demonstrate the long-term maintenance arrangements for the surface water drainage system, including details of runoff sub-catchments, SuDS components, control structures, flow routes and outfalls and a plan clarifying the access that is required to each surface water management component for maintenance purposes. It has therefore not been demonstrated that provisions would be put in place to ensure that SuDS are maintained which would be contrary to Policy LP15 of Huntingdonshire's Local Plan to 2036.

5. Insufficient information has been submitted to demonstrate that noise levels for future occupiers could be mitigated to an acceptable level or that good acoustic design has been incorporated into the proposals. As such, the proposal would be contrary to Policy LP14 of the Huntingdonshire Local Plan to 2036 and the National Planning Policy Framework (2024).

6. The application as submitted does not include sufficient information to properly determine the highway impact of the proposed development and to demonstrate that it would not be prejudicial to the satisfactory functioning of the highway. The proposal would therefore be contrary to the Policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036 and the National Planning Policy Framework (2024).

7. Insufficient information has been submitted to demonstrate that light spill from internal elements of the development alongside any required external lighting would not have an adverse impact on protected species particularly bats contrary to Policy LP30 of Huntingdonshire’s Local Plan to 2036, the National Planning Policy Framework (2024) and Regulation 43 of The Conservation of Habitats and Species Regulations 2017 (as amended).

8. The proposed development would hinder the sites future capacity to support nature as part of the wider Meadow Lane Gravel Pit County Wildlife Site, Great Ouse Valley Habitat Network and Great Ouse Valley Green Infrastructure Priority Area. Whilst habitat degradation has occurred prior to the submission of the application, it is considered that if it is left to self-restore, the site would be able to recover and would again be able to support a broad range of high value species. The proposed development is contrary to the aims of Policy LP3, LP30 and LP31 of Huntingdonshire's Local Plan to 2036 and the National Planning Policy Framework (2024).

9. Insufficient and inaccurate information has been provided to demonstrate that the development would provide the Biodiversity Net Gain set out within the metric supplied. The clearance carried out on the site since 30th January 2020 and prior to the submission of the application has resulted in significant changes to the biodiversity value of the site. The submitted baseline biodiversity assessment does not account for all habitat removed and appropriate consideration, using a precautionary approach, of the preclearance biodiversity value of the site has not been applied. The development therefore conflicts with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), the NPPF 2024 and Policy LP30 of the Local Plan which seeks to minimise impacts on and provide net gains for biodiversity.

10. Due to the omission of a signed Section 106 Agreement, the proposed development would fail to deliver the required infrastructure and social benefits, specifically Affordable Housing, Biodiversity Net Gain and Waste Management. As such, the proposal is contrary to Policy LP4 of Huntingdonshire’s Local Plan to 2036, the National Planning Policy Framework (2024) and the Developer Contributions Supplementary Planning Document (2011) (costs updated annually).

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.

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