From: DevelopmentControl
To: DevelopmentControl
Subject: Comments for Planning Application 26/01897/FUL
Date: 20 November 2026 17:25:51

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 20/11/2026 5:25 PM from [redacted]

Application Summary

Address:	Land Northeast Of 2 Old Houghton Road And Southeast Of Main Street Hartford
Proposal:	Erection of a discount foodstore (Use class E) including access, parking, landscaping and other associated infrastructure and works.
Case Officer:	Angela Brockett

Click for further information

Customer Details

Name:	[redacted]
Email:	[redacted]
Address:	2 Snowy Way Hartford Huntingdon

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	FORMAL OBJECTION TO PLANNING APPLICATION 26/01897FUL I am writing to register my strong opposition to the proposed development of a new Lidl supermarket in Hartford Huntingdon. Whilst I appreciate Lidl's commitment to expanding its market presence, their chosen site in Hartford is entirely unsuitable for a commercial, retail development and raises critical material planning concerns that cannot be adequately mitigated. 1. FLOODING RISK AND AREA DRAINAGE 1.1. The risk of flooding is of great concern to me and other Hartford residents. The subject field and the field to the NE of the roundabout flood and hold surface water throughout the winter. The site is near the River Great Ouse and is designated Flood Zone 2. The information presented on the HDC planning portal is extensive and I believe not comprehensively linked. 1.2. Regarding the Flood Risk Assessment (FRA) and Drainage Strategy package submitted in support of the above application-specifically comprising Link Engineering's Flood Risk Assessment & Drainage Strategy Report (Ref: LE26015-FRA0001, v1.0, dated 2 October 2026), Stantec's Hydraulic Modelling Report (Ref: 330910205/001, Rev A, October 2026) and 2022 Groundwater Technical Note (Ref: 332510813/TN01), Remada Geo Consultants' Phase 2 Ground Investigation (Ref: 1508.02.01, August 2026), and Anglian Water's Pre-Planning Assessment Reports (PPE-0245488 and PPE-26-008069). 1.3. Reading these documents reveals potentially critical engineering contradictions, unintegrated 3D ground models, apparent hydraulic calculation errors, and an unresolved statutory consultee objection from Anglian Water. Until these discrepancies are reconciled, the application fails to demonstrate compliance with the August 2026 National Planning Policy Framework (NPPF)

(Policies F5, F6, and F8), Defra's June 2025 National Standards for Sustainable Drainage Systems, and Huntingdonshire Local Plan Policies LP5 and LP15. The apparent errors and contradictions are detailed at Annex A.

2. TRAFFIC CONGESTION AND ROAD SAFETY

2.1. B1514 Main Street and Longstaff Way already carry heavy traffic volumes and lack the capacity to absorb the 2,000 to 2,500 daily vehicle movements this supermarket will generate. A review of the applicant's Transport Assessment (Link Engineering, Revision P01, dated 05 October 2026) reveals major technical omissions, outdated baseline data, unaddressed safety hazards, and local factual errors. As a result, the proposal fails to comply with Huntingdonshire Local Plan Policies LP16 and LP17, the Huntingdonshire Design Guide SPD (2017), and Section 15 (Policies TR3, TR4, and TR6) of the National Planning Policy Framework (August 2026).

2.2 Omission of the Adjacent Roundabout and Wider Network (see Annex B, Section 1): The Transport Assessment models only the proposed store access T-junction and omits capacity, queueing, and safety modelling for the immediately adjacent A141 / B1514 / A1123 roundabout, Owl Way, Old Houghton Road, and adjacent bus stops, leaving severe risks of queueing and interlocking traffic conflicts unassessed.

2.3. Exacerbation of the Owl Way "Rat-Run" (see Annex B, Section 2): Increased congestion on B1514 Main Street and Longstaff Way will inevitably push more motorists onto Owl Way. This is a 20mph residential street already affected by speeding shortcut traffic-yet the assessment offers zero analysis or mitigation.

2.4. Unacceptable Highway Safety, Crossing, and Speed Limit Shortfalls (see Annex B, Section 3): No Stage 1 Road Safety Audit has been submitted. Pedestrian access relies on an unsafe uncontrolled refuge island, the proposed 30mph speed limit reduction is unsecured. The applicant's own modelling flags visibility warnings and near-failure delays, and an existing local collision cluster goes unmitigated.

2.5. Outdated Baseline Data and Flawed Trip Generation Assumptions (see Annex B, Section 4): The assessment relies on four-year-old traffic surveys from an unrelated site with no actual Saturday counts and applies an unjustified 50% pass-by discount to halve its projected Saturday peak impact.

2.6. Substandard Site Layout, Servicing, and Local Factual Errors (see Annex B, Section 5): Articulated delivery lorries will conflict with customer parking during peak trading hours, parking bay dimensions and EV charging numbers breach local policy standards, public transport upgrades are omitted, and multiple local factual errors undermine confidence in the submission.

2.7. For the reasons summarised above and detailed at Annex B, the applicant has failed to demonstrate that the transport, rat-running, and highway safety impacts of this development can be safely accommodated.

3. ECOLOGICAL, DESIGN, AND CROSS-DOCUMENT OBJECTIONS

3.1. Direct Contradiction Between Lighting Plans and Bat/Ecology Mitigation (see Annex C, Section 1): While the Ecological Impact Assessment (EcIA) and Design & Access Statement (DAS) promise "dark sky", low-level lighting to protect foraging bats and wildlife, the Signify Luminaire Schedule actually specifies 55 un-dimmed lanterns-including upward-tilted 6m columns-that flood boundary vegetation and bat-roost trees with up to 116 lux, breaching bat-corridor standards.

3.2. Potentially Unlawful Destruction of a Potentially Protected "Important" Hedgerow and Unmonitored Mitigation (see Annex C, Section 2): The applicant proposes removing a wide section of a species-rich northern hedgerow that may be legally protected under The Hedgerow Regulations 1997 without completing a formal assessment. Furthermore, despite triggering a Natural England SSSI Impact Risk Zone, no statutory consultation has occurred, and no post-determination ecological monitoring is proposed.

3.3. Infilling of a Priority Pond and Contradictory Flood/BNG Land Use (see Annex C, Section 3): The scheme unavoidably infills 5 m² of a Priority Habitat

pond supporting Common Toads. In addition, the application contradicts itself on how mandatory 10% Biodiversity Net Gain (BNG) will be achieved, simultaneously earmarking the adjacent eastern parcel for flood-water storage re-levelling, off-site BNG habitat, and elsewhere claiming the deficit will be resolved entirely via a local habitat bank.

3.4. Further Contradictions Across the Submission Documents (see Annex C, Section 4): Basic inconsistencies run throughout the application, including mislocating the Conservation Area, the architects admitting the building's design does not contribute to local character, conflicting daily HGV delivery figures, and mismatched EV charger specifications with no DNO power supply checks.

4. MERGED CRITIQUE: CONSULTATION, HERITAGE, ARCHAEOLOGY & SITE HISTORY

4.1. Flawed Consultation & Unfulfilled Commitments (SCI): The Statement of Community Involvement misstates public support as 55% in its conclusion (Page 9) when its own chart shows 50% Yes / 44% No / 6% Unsure (Page 7). Despite 44% opposing the scheme over traffic, Owl Way, and pedestrian crossings, no layout changes were made (contrary to NPPF Policy DM1), the promised "independent Road Safety Audit" (Page 9) was omitted from the submission, and residents were misled that the eastern parcel would remain "green and undeveloped" (Pages 3 & 9) despite plans to mechanically re-level it for flood storage.

4.2. Unrecorded Destruction of Medieval Archaeology & Conservation Area Harm (Archaeological DBA & Heritage Statement): The Archaeological DBA confirms the site contains medieval ridge and furrow earthworks (HER MCB10496, Page 24) that will be destroyed, stating loss "could be mitigated by preservation by record"-yet proposes no recording or trial trenching in its conclusions (Page 25), breaching Local Plan Policy LP34 despite Saxon and prehistoric finds just 55m away. It also claims "no evidence of any modern impacts" on site (Page 7), directly contradicting the Design & Access Statement's record of 2023 drainage trenching (22/01134/FUL, Page 28). Meanwhile, the Heritage Statement's claim of "no harm" to the adjacent Hartford Conservation Area ignores 6m upward-tilted floodlights spilling 15-25 lux through the western boundary trees (DWG 02), a proposed flagpole sign facing the Conservation Area (DAS Section 19.2), and the architects' admission that the store "does not make a contribution" to local character (DAS Page 40).

4.3. Detailed assessment of this paragraph is at Annex D.

5. PLANNING & RETAIL IMPACT ASSESSMENT

5.1. Flood Zone 2 Sequential Test Failure & Contradictory Site History (Planning & Retail Impact Assessment): The PRIA admits the site lies within Flood Zone 2 (Page 9) and a Green Infrastructure Priority Area, yet bypasses a Flood Risk Sequential Test (Local Plan Policy LP5) by relying on an expired 2023 drainage permission (22/01134/FUL) that it admits "was never implemented" (Page 10)-directly contradicting the Design & Access Statement, which claims those works were built (Page 28), and the Archaeological DBA, which claims "no modern impacts" occurred (Page 7). Furthermore, the PRIA cites a 12-minute drivetime catchment (Page 36) and relies on 4,900 proposed homes at Lodge Farm opposite the A141 roundabout to justify retail demand (Page 35), while the Transport Assessment omits both those homes and the roundabout from its traffic modelling.

5.2 Detailed assessment of this paragraph is at Annex E.

6. IN CONCLUSION

I respectfully request that Huntingdonshire District Council revisits this planning application and scrutinises the extremely large amount of data provided by the applicant and the applicant's many agents. The fundamental errors in, and conflicts between, the submitted documents do not provide a sound basis for granting planning permission. I trust that Huntingdon District Council, Cambridgeshire County Council, the local flood authority and the Environment Agency will combine to reject this planning application.



ANNEXES A TO E TO LETTER REGARDING FORMAL OBJECTION TO PLANNING APPLICATION 26/01897FUL DATED 20 NOVEMBER 2026

ANNEX A: FLOODING RISK AND AREA DRAINAGE
- Application Reference: 26/01897/FUL - Proposed Lidl Discount Foodstore, Land at B1514 Main Street / A141 / A1123, Hartford, Huntingdon
- Documents Scrutinised: Link Engineering Flood Risk Assessment & Drainage Strategy Report (FRA, Ref: LE26015-FRA0001, v1.0, dated 2 October 2026) and Drawings DR-C-0501 & DR-C-0520; Stantec Hydraulic Modelling Report (Ref: 330910205/001, Rev A, October 2026) and 2022 Groundwater Technical Note (Ref: 332510813/TN01); Remada Geo Consultants Phase 2 Ground Investigation (GI, Ref: 1508.02.01, August 2026); Anglian Water Pre-Planning Assessment Reports (PPE-0245488, August 2026 and PPE-26-008069, September 2026); KLH Architects Site Plan (0301 P21).
- Key Policies & Guidance: NPPF (August 2026) Policy F5; Huntingdonshire Local Plan Policy LP5; Defra FD2320 Flood Hazard Guidance.
Summary of Objection: Examination of the Flood Risk Assessment and Drainage Strategy package reveals potentially critical engineering contradictions, unintegrated 3D ground models, apparent hydraulic calculation errors, and an unresolved statutory consultee objection from Anglian Water. Huntingdonshire District Council (HDC) is requested to insist that the applicant addresses all matters below.
1. Spatial Conflict & Unintegrated 3D Ground Models (Compensation Basin vs. Surface Water SuDS)
1.1 Direct Layout Clash: Stantec's Proposed Ground Model (Figure 6-1 and Drawing 330910205/1001/SK02) excavates a deep Flood Compensation Basin (4,495m², graded down to 8.50m-8.58m AOD) along the eastern side of the site. Conversely, Link Engineering's Proposed Drainage Layout (LHH-LINK-XX-XX-DR-C-0501) places the primary cellular attenuation tank (S15, invert level 7.22m AOD, cover level 8.66m AOD), permeable paving (CL 8.833m AOD), and a bioretention area directly within that same eastern compensation footprint.
1.2 Incomplete Hydraulic Modelling: Stantec explicitly notes in Section 6.2.12 that its model relies on a generic 9.05m AOD development pad and that "the final proposed ground model will be developed by the project drainage consultant and tied into the flood compensation model". Stantec should be required to re-run its post-development 2D TUFLOW model using Link Engineering's actual proposed site levels (FFL 9.650m AOD on DR-C-0501) and final car park/access road levels.
1.3 Inconsistent Site Boundaries & Areas: Across the package, the total site/catchment area varies between 1.319 ha (KLH Architects Site Plan 0301 P21: 0.890 ha Lidl demise + 0.429 ha eastern parcel), 1.307 ha (Remada GI Section 1.3), 0.74 ha (Link FRA Section 4.2.1), 0.89 ha / 8,900m² (Link FRA Section 4.8.2), and ~0.563 ha / 5,634.5m² (sum of sub-catchments on Link Drawing DR-C-0520). A single unified red-line boundary and impermeable area schedule must be established.

2. Hydraulic Modelling Instabilities and Apparent Calculation Errors
2.1 Apparent Mass Balance Errors and Node Flooding: Link Engineering's Flow+ surface water model (SW layout.pfd, Appendix F) exhibits a Lowest Mass Balance error of -455.07% in the 1-year return period simulation and -21.13% in the 30-year + 35% climate change simulation (far outside the ±1% engineering standard). Furthermore, the 100-year + 40% climate change normal operation simulation shows active surface flooding at Nodes 1 (6.83m³), 2 (4.90m³), and 11 (9.60m³)-directly contradicting Section 4.6.4's claim that the system attenuates all flows up to the 100-year + 40% event without flooding.
2.2 Unrealistic Outfall Tailwater Assumption: Link Engineering's FRA (Section 4.1.2) models the eastern ditch using an erroneous Manning's formula syntax (+ instead of × in Appendix E) and assumes free-flowing gravity discharge at 8.30m AOD (138 l/s capacity). However, Stantec's hydraulic model proves the ditch overtops its western bank in every simulated storm (including the 1 in 30-year event) due to backwater locking at 8.75m AOD from the River Great Ouse flap valve. Link Engineering should re-run its drainage simulations with a submerged outfall tailwater boundary of 8.75m AOD.
2.3 Contradictory Greenfield Runoff & SuDS Specifications:
2.3.1 FRA Table 3 reports Greenfield Runoff rates (QBar = 2.7 l/s, 100-yr = 9.7 l/s) that conflict with the HR Wallingford UKSuDS printout in Appendix F (QBar = 1.6 l/s, 100-yr = 5.6 l/s), wherein Link Engineering manually overrode the mapped WRAP Soil Type 4 to Type 3 (SPR = 0.37) despite Remada's cohesive clay borehole logs.
2.3.2 FRA Table 5 states Bioretention Systems are not proposed ("No"), yet

Section 4.8.8 relies on a 180m² bioretention area to satisfy the 5mm interception standard and Drawing DR-C-0501 depicts it on site. Conversely, Table 5 claims Rainwater Harvesting is proposed ("Yes") and Section 4.8.4 relies on a 6,000L tank, whereas Table 2 marks rainwater harvesting as unviable ("x").
3. Groundwater Buoyancy & Flotation Risk on Buried Attenuation Tanks
3.1 Seasonal Water Table Exceeding Invert Depths: Stantec's winter groundwater monitoring (Nov 2021 - Mar 2022, Appendix D) recorded the water table rising to 8.19m AOD (0.31m bgl). Link Engineering proposes installing cellular attenuation crates (S15) down to an invert level of 7.22m AOD and pumping stations down to 6.443m AOD (S14)-nearly 1.0m below the seasonal winter water table-without providing buoyancy/flotation calculations, ballast slabs, or impermeable membrane specifications to prevent groundwater ingress from displacing attenuation storage.
4. Unresolved Statutory Objection from Anglian Water (Foul Capacity)
4.1 Formal Recommendations for Refusal: Both Anglian Water's Tier 1 (PPE-0245488, August 2026) and Tier 2 (PPE-26-008069, September 2026) Pre-Planning Assessment Reports formally object to any foul water connection and recommend that planning permission be refused because Huntingdon (Godmanchester) Water Recycling Centre (WRC) lacks Dry Weather Flow headroom and has no AMP 8 (2025-2030) upgrade funding.
4.2 Absence of Legally Binding Mitigation: Link Engineering's FRA (Section 5.1.2) acknowledges this objection yet proposes pumping foul flows to manhole MH8903 in Owl Way without proposing a legally binding mitigation mechanism (such as a Grampian condition barring occupation until WRC capacity upgrades are delivered, or a flow-neutral/off-mains solution).
5. Policy Compliance: Flood Zone 2 Sequential Test, Climate Change & Car Park Safety
5.1 Sequential Test Omission (NPPF Policy F5 & Local Plan Policy LP5): Link FRA Section 1.8.4 makes an unsubstantiated claim that future Environment Agency remodelling will reclassify the site to Flood Zone 1, while Section 1.8.3 and Stantec Section 1.2.7 confirm the site lies entirely within Flood Zone 2. Because the site is exposed to fluvial/backwater flooding from an ordinary watercourse, it is not exempt from the Sequential Test under the August 2026 NPPF, and a formal catchment-based Sequential Test must be submitted.
5.2 Climate Change Allowance (+19% vs. +40%): Stantec applied a +19% central peak river flow allowance. Written confirmation should be obtained from the Lead Local Flood Authority (LLFA) and Environment Agency as to whether the +40% Upper End peak rainfall allowance must be applied given the small, heavily urbanised nature of the ordinary watercourse catchment (URBEXT2015 = 0.782 in Catchment 1).
5.3 Defra FD2320 Car Park Safety and Arboricultural Sign-Off: Due to tree Root Protection Area (RPA) constraints (3,920m²), approximately 1,000m² of the customer car park floods to a depth of 220mm during the design event. In accordance with Local Plan Policy LP5, a formal Defra FD2320 flood hazard assessment (depth × velocity + debris factor) is required-confirming that disabled parking bays and safe pedestrian/vehicular escape routes remain flood-free-alongside an Arboricultural Method Statement approving the 5m-wide hand-dug/air-spade spill channel through the RPA.
6. Conclusion & Action Requested: In light of the fundamental conflicts between the proposed drainage layout and the flood compensation basin, the unresolved mass balance and flooding errors in the surface water calculations, the omitted Flood Zone 2 Sequential Test, and Anglian Water's formal recommendation for refusal, the submitted documents do not provide a sound basis for granting planning permission. HDC is requested to refuse the application on flood risk and drainage grounds.
ANNEX B: TRANSPORT, HIGHWAY SAFETY & SITE SERVICING
- Application Reference: 26/01897/FUL - Proposed Lidl Discount Foodstore, Land at B1514 Main Street / A141 / A1123, Hartford, Huntingdon
- Documents Scrutinised: Transport Assessment (TA) by Link Engineering (Ref: LE26015 / TR-002, Revision P01, dated 05 October 2026), including Appendix A (Site Location), Appendix B (Swept Path Drawings), and Appendix E (JUNCTIONS 11 Modelling).
- Key Policies & Guidance: NPPF Policies TR3 and TR4; Huntingdonshire Local Plan (EV Charging Standards); Huntingdonshire Design Guide SPD (Parking Bay Dimensions).
Summary of Objection: The Transport Assessment omits the adjacent strategic roundabout and nearby residential junctions, relies on outdated baseline traffic counts and unverified trip discounts, lacks a Stage 1 Road Safety Audit, and introduces unacceptable highway safety and servicing conflicts.

1. Omission of the Adjacent A141 / B1514 / A1123 Roundabout & Wider

Network
1.1 Adjacent Roundabout Ignored: The Transport Assessment models only the proposed priority T-junction into the store car park and carries out no capacity, queueing, or safety assessment on the immediately adjacent four-arm A141 / B1514 / A1123 roundabout (referred to in the report by the unfamiliar name "Wheatsheaf roundabout"). The site sits directly in its southwest quadrant, 30% of all store traffic will route through it, and the store entrance is located just metres from its westbound exit. Without modelling this roundabout, the applicant cannot demonstrate that queues will not back up onto the circulatory carriageway.
1.2 Owl Way, Old Houghton Road & Bus Stops Excluded: The assessment fails to model impacts on nearby junctions and bus stops. Turning right out of Owl Way toward Huntingdon is already difficult at busy times; introducing a new two-lane exit from Lidl just metres away-with right-turning queues of up to 264 vehicles per hour entering the site on Saturdays-creates a severe risk of blocking back and interlocking traffic conflicts.
2. Exacerbation of the Existing Owl Way "Rat-Run"
2.1 Existing Residential Pressure: Owl Way is a 20mph residential street with speed cushions that already suffers from motorists using it as a shortcut at excessive speeds to bypass congestion on the main roads.
2.2 Unmitigated Diversion Risk: Additional queueing and delays on B1514 Main Street and Longstaff Way will inevitably push more drivers through Owl Way to access the store or avoid main-road queues. Despite this clear risk to residential safety and amenity, the Transport Assessment contains zero assessment or mitigation to prevent Owl Way from becoming a heavier rat-run.
3. Unacceptable Highway Safety, Crossing & Speed Limit Shortfalls
3.1 No Stage 1 Road Safety Audit: Despite proposing a major new retail access near a busy roundabout, bus stops, and residential junctions, no comprehensive Stage 1 Road Safety Audit has been submitted.
3.2 Inadequate Pedestrian Crossing Facilities: There is currently no controlled crossing (such as a zebra or pelican crossing) at the Owl Way / Main Street junction-only an uncontrolled central refuge island. Encouraging large numbers of shoppers, families, and elderly residents from the Birds Estate to cross a busy distributor road via an uncontrolled refuge island is unsafe and contrary to NPPF Policies TR3 and TR4.
3.3 Unsecured 30mph Speed Limit Reduction: The applicant's safety case relies on lowering the B1514 speed limit from 40mph to 30mph past the site. However, this requires a separate statutory Traffic Regulation Order (TRO) which is neither secured nor guaranteed, and vehicles exiting the 50mph/national speed limit A141 arms may still approach the store access at excessive speeds.
3.4 Ignored Junction Visibility Warnings & Severe Delays: In Appendix E, the applicant's own JUNCTIONS 11 model flags a formal warning on every run ("Visibility to right expected to have two components if the arm has two lanes..."), showing that vehicles waiting side-by-side to exit Lidl will block each other's view of oncoming traffic. Furthermore, Table 7 shows vehicles turning right out of the store (Stream B-A) will operate at Level of Service E (approaching failure) on Saturdays with delays up to 38.64 seconds, encouraging drivers to take unsafe gaps.
3.5 Existing Collision Cluster: Figure 5 records seven injury collisions in the immediate vicinity over the past five years, including a cluster of three collisions on the B1514 Main Street approach right next to the site, yet proposes no physical junction mitigation.
4. Outdated Baseline Data & Flawed Trip Generation Assumptions
4.1 Four-Year-Old Surveys & No Saturday Counts: Baseline traffic relies on October 2022 counts taken for an unrelated site (Alconbury Weald). No Saturday traffic counts were conducted-the consultants merely applied a flat 10% uplift to weekday figures, failing to reflect genuine Saturday retail and leisure peaks.
4.2 Unjustified 50% Trip Discount: The report halves its Saturday peak impact from 260 to 130 vehicle movements by assuming 50% of trips are already passing by on Main Street. Discount food stores act as primary destinations rather than impulse stops, and no sensitivity testing has been provided to justify this 50% reduction.
5. Substandard Site Layout, Servicing & Local Factual Errors
5.1 HGV Car Park Conflicts: Appendix B confirms 16.5m articulated lorries will drive through the main customer car park aisle and swing across customer parking bays to reverse into the loading bay, with the report admitting deliveries may occur during peak trading hours when the car park is full.
5.2 Policy Breaches on Parking & EV Charging: Eastern boundary parking bays are only 4.7m deep (below the 2.5m × 5.0m standard in the Huntingdonshire

Design Guide SPD), and only 2 active EV chargers are provided for 118 spaces (below the Local Plan standard of 1 per 50 spaces, which requires 3).
5.3 Incomplete Public Transport Provision: Table 1 omits bus route RH3 (despite mapping it on Figure 10), and no developer funding is offered to upgrade the adjacent eastbound bus stop on Main Street, which lacks a shelter or seating.
5.4 Lack of Local Scrutiny: The submission contains multiple basic local errors that undermine confidence in its findings:
- Misnaming the adjacent A141/B1514/A1123 roundabout as the "Wheatsheaf roundabout".
- Titling its swept path drawing "Lidl Huntingdon" (Appendix B).
- Locating the site on "Houghton Road" (Appendix A).
6. Conclusion & Action Requested: The Transport Assessment fails to model the critical adjacent roundabout and residential junctions, omits a Stage 1 Road Safety Audit, relies on unsecured speed limit changes and outdated 2022 data, and introduces unacceptable highway safety risks. HDC is requested to refuse the application on highway safety and severe residual cumulative impact grounds, or require a full, independently audited network reassessment prior to determination.
ANNEX C: ECOLOGY, LIGHTING & BIODIVERSITY NET GAIN
- Application Reference: 26/01897/FUL - Proposed Lidl Discount Foodstore, Land at B1514 Main Street / A141 / A1123, Hartford, Huntingdon
- Documents Scrutinised: Ecological Impact Assessment (EcIA) by Enzygo; Design & Access Statement (DAS) by KLH Architects; Signify Luminaire Schedule (DWG 00-02); Site Plan (6518-KLH-XX-00-DR-A-0301); Transport Assessment (TA) by Link Engineering.
- Key Policies & Guidance: The Hedgerow Regulations 1997; Environment Act 2021 (Mandatory 10% Biodiversity Net Gain); ILP Bats and Artificial Lighting at Night Guidance; Natural England SSSI Impact Risk Zone Requirements.
Summary of Objection: The applicant's ecological mitigation relies on lighting and land-use commitments that are directly contradicted by its own technical drawings, while proposing the unassessed removal of a potentially protected hedgerow, the infilling of a Priority Habitat pond, and conflicting Biodiversity Net Gain (BNG) strategies without statutory consultation.
1. Direct Contradiction Between Lighting Plans & Bat/Ecology Mitigation
1.1 What the EcIA & DAS Claim: To protect foraging bats and wildlife along the retained hedgerows and pond, the EcIA relies on "directional, low-level, low-lux lighting designed in accordance with ILP Bats and Artificial Lighting at Night guidance" (Table 4). The DAS likewise promises "dark sky" exterior lighting (Section 24.1).
1.2 What the Lighting Schedule Actually Shows: The Signify Luminaire Schedule (DWG 00-02) specifies 55 lanterns, including 6m-high columns tilted upward at 5° and 25°, operating at Constant Light Output (CLO) without dimming. Spill light extends to the site boundaries (DWG 01), hitting 15 to 25 lux along the northern and western boundary vegetation (breaching ILP bat-corridor standards of <1 lux) and blasting the rear walkway and delivery lane next to the western bat-roost trees with 81 lux and 116 lux (DWG 02). Worse, Signify explicitly notes the design is preliminary, not for construction, and ignores physical obstructions like trees (DWG 00).
2. Unlawful Destruction of a Potentially Protected "Important" Hedgerow & Unmonitored Mitigation
2.1 Unassessed Protected Hedgerow: The EcIA admits the species-rich northern native hedgerow along Main Street qualifies as a UK Priority Habitat and "may qualify as Ecologically & Historically 'Important' under The Hedgerow Regulations 1997" (Page 20). Despite flagging potential legal protection, the applicant has not completed a formal Hedgerow Regulations assessment prior to determination, yet proposes ripping out a wide section of it for the store access road and footpath.
2.2 No Statutory Consultation or Post-Determination Monitoring: Although the site triggers a Natural England SSSI Impact Risk Zone for commercial developments over 1,000m² (EcIA Pages 15-16), Enzygo admits no correspondence has taken place with Natural England or the County Ecologist (Section 1.5.2), and confirms zero post-determination monitoring is proposed to verify that any mitigation works (Section 6.2.1).
3. Infills to a Priority Pond & Contradictory Flood/BNG Land Use
3.1 Priority Habitat Pond Destruction: The proposal unavoidably infills 5m² of an on-site permanent pond that qualifies as a Priority Habitat and supports Common Toads (EcIA Pages 19 & 31).
3.2 Conflicting & Contradictory BNG Plans: The Site Plan (6518-KLH-XX-00-DR-A-0301) and Transport Assessment state the adjacent 0.429-hectare eastern parcel is being re-levelled for flood water storage capacity. However, the EcIA contradicts itself on how mandatory 10% Biodiversity Net Gain (BNG) will be

delivered: Page 18 states this exact same eastern parcel "will be utilised for off-site BNG", whereas Page 2 states the deficit "will be resolved entirely through off-site units provided by a local habitat bank provider". Neither document explains how heavy flood-engineering works are compatible with creating high-value habitat, or why zero BNG can be achieved on the main store site.
4. Further Contradictions Across the Submission Documents
4.1 Conservation Area Clashes & Architect Admission: The DAS incorrectly claims the Conservation Area lies to the east of the site (Section 5.1, Page 7), despite its own map showing it to the west/south-west. Even more tellingly, in Section 26.3 (Page 40), the applicant's own architects openly admit their standard white and metallic silver cladding box "does not make a contribution" to local character and distinctiveness-while relying on boundary trees for screening that are simultaneously being cut into for the access road and lit up by 6m floodlights.
4.2. Conflicting HGV Delivery Numbers: The Transport Assessment claims servicing requires 1 HGV delivery per day (rising to 2 in seasonal peaks), whereas the Design & Access Statement states there will be 2-3 daily HGV deliveries (Section 18.2).
4.3. Inconsistent EV Charger Specifications & Unchecked Power Supply: The Transport Assessment specifies standard EV charging bays, while the DAS specifies 22kW & 50kW DC Rapid Charging spaces (Section 18.2), yet the Signify electrical notes admit no DNO power supply checks or cable sizing have been carried out (DWG 00).
5. Conclusion & Action Requested: Given the stark conflict between the Signify lighting schedule and bat mitigation commitments, the absence of a formal Hedgerow Regulations assessment, the infilling of a Priority Habitat pond, and contradictory BNG delivery claims, the application fails to demonstrate compliance with statutory ecological protections. HDC is requested to refuse the application.
ANNEX D: PUBLIC CONSULTATION, HERITAGE & ARCHAEOLOGY
- Application Reference: 26/01897/FUL - Proposed Lidl Discount Foodstore, Land at B1514 Main Street / A141 / A1123, Hartford, Huntingdon
- Documents Scrutinised: Statement of Community Involvement (SCI); Archaeological Desk-Based Assessment (DBA) by Lanpro; Heritage Statement; Design & Access Statement (DAS) by KLH Architects; Site Plan (6518-KLH-XX-00-DR-A-0301); Ecological Impact Assessment (EcIA); Signify Luminaire Schedule (DWG 02).
- Key Policies & Guidance: NPPF Policy DM1; Huntingdonshire Local Plan Policy LP34 (Heritage Assets and their Settings).
Summary of Objection: The Statement of Community Involvement misrepresents public support through a basic mathematical error and fails to deliver promised safety audits, while the Archaeological DBA and Heritage Statement contain serious omissions and contradictions regarding prior ground disturbance, medieval earthworks, and impacts on the Hartford Conservation Area.

1. Mathematical Error, [redacted] & Unfulfilled Commitments in the Consultation (SCI)
1.1 Inflated Support Figures: On Page 7 of the SCI, the exact consultation breakdown is listed as 617 Yes (50%), 549 No (44%), and 76 Unsure (6%) out of 1,242 responses. Yet in the Conclusion on Page 9, the consultants claim "55% were in favour, 44% against and 6% unsure"-a total of 105%. In reality, half of respondents (50%) did not support the scheme.
1.2 Ignoring Consultation Feedback (NPPF Breach): On Page 4, the SCI highlights NPPF Policy DM1 requiring developers to show "the extent to which the proposal has changed in response to this engagement". Despite a significant number of residents objecting over traffic, Owl Way, the roundabout, and pedestrian crossings, the layout did not change at all. Instead, the SCI claims on Page 9 that an "independent Road Safety Audit has been commissioned"-yet no such audit was submitted with the application.
1.3 Misleading Leaflet Claims on Deliveries & Bus Crossings: The consultation leaflet (Page 11) told residents the store would have "between one and two deliveries per day, rising to three at peak times", contradicting the Transport Assessment (1 daily delivery, up to 2 at peaks). Meanwhile, Page 8 claims the existing central refuge island between the Main Street bus stops provides a safe connection to the Birds Estate-ignoring that shoppers with trolleys, pushchairs, or mobility aids will cross a busy distributor road without a controlled zebra or signalised crossing.
2. Contradictory Claims About the Eastern Land Parcel
2.1 Consultation Promises vs. Submitted Plans: On Pages 3, 9, and 13, the SCI repeatedly tells residents and the press that the eastern parcel is being "retained

as green and undeveloped space" to "retain biodiversity" and "reduce flood risk impact". However, as confirmed by the Site Plan (6518-KLH-XX-00-DR-A-0301) and EcIA, that land is not being left untouched-it is being mechanically re-levelled for flood-water storage while simultaneously being claimed for off-site Biodiversity Net Gain.

3. Destruction of Medieval Ridge & Furrow Without Recording & Contradictory Site History (Archaeological DBA)

3.1 "Preservation by Record" Offered Without Any Mitigation Plan: On Page 24 (Section 7.2.1) of the Archaeological DBA, Lanpro admits the extant medieval ridge and furrow earthworks (HER MCB10496, clearly visible on the 2022 LiDAR imagery in Figure 9) will be destroyed by the development, stating "any loss could be mitigated by preservation by record". Yet the report's Conclusions (Page 25) recommend no archaeological recording, trial trenching, or Written Scheme of Investigation (WSI)-meaning the earthworks will simply be bulldozed unrecorded, breaching Local Plan Policy LP34.

3.2 Contradiction Over Prior Ground Disturbance ("No Modern Impacts" vs. 2023 Drainage Engineering): On Page 7 (Section 2.3.1) of the Archaeological DBA, Lanpro explicitly states "there is no evidence of any modern impacts" on the site. Yet on Page 28 (Section 17.3) of the Design & Access Statement, KLH Architects state that planning permission 22/01134/FUL for "engineering works to improve drainage and ground conditions" was approved in 2023 and carried out on site (showing before-and-after aerial photos of trenches dug across the field). Either the archaeologists missed major 2023 engineering trenches, or those works already disturbed the ground without archaeological monitoring.

3.3 High Risk of Unrecorded Saxon/Prehistoric Remains Around the Eastern Parcel: The DBA admits Anglo-Saxon remains were found just 55m south at the WATA site (ECB4089, Page 18) and prehistoric/medieval features directly next door at 2 Old Houghton Road (ECB5980, Page 18). Crucially, Section 5.3.1 (Page 17) notes that the ridge-and-furrow record covers the site "apart from the wooded roadside embankment" (the eastern parcel), and River Terrace sands and gravels underlie the site (Page 7)-a prime geological setting for early prehistoric/Saxon remains that magnetometry alone frequently misses without trial trenching. Yet the eastern parcel is about to be mechanically re-levelled for flood storage with zero trial trenching proposed. (Note: Historic OS maps in Figures 4-6, Pages 36-38, also show the land immediately south of the site explicitly labelled "Liable to Floods").

4. Heritage Statement vs. Design & Access Statement Contradictions

4.1 Gateway to the Conservation Area: The Heritage Statement admits on Page 25 (Section 7.2.9) that the site sits directly at the threshold of the Hartford Conservation Area, and that the western tree line acts as a "gateway into the CA". Yet it argues the store causes "no harm" solely because that western tree line is kept.

4.2 Omission of Visual, Lighting & Design Impacts: This "no harm" conclusion ignores three obvious impacts visible in the applicant's other documents:

- The 15-25 lux light spill from 6m upward-tilted floodlights shining through and over those exact western boundary trees (DWG 02).
- The Lidl flagpole sign specifically designed to be visible from the Conservation Area approach (DAS Section 19.2).
- The architects' own admission in the DAS (Section 26.3, Page 40) that the building "does not make a contribution" to local character and distinctiveness.

5. Conclusion & Action Requested: The consultation record is marred by inaccurate reporting and unfulfilled commitments, while the archaeological and heritage assessments fail to reconcile basic site history or protect medieval earthworks and the setting of the Hartford Conservation Area. HDC is requested to refuse the application under Local Plan Policy LP34 and NPPF Policy DM1.

ANNEX E: PLANNING & RETAIL IMPACT ASSESSMENT

- Application Reference: 26/01897/FUL - Proposed Lidl Discount Foodstore, Land at B1514 Main Street / A141 / A1123, Hartford, Huntingdon
- Documents Scrutinised: Planning & Retail Impact Assessment (PRIA) by Lanpro; Design & Access Statement (DAS) by KLH Architects; Archaeological Desk-Based Assessment (DBA) by Lanpro; Site Plan (6518-KLH-XX-00-DR-A-0301); Ecological Impact Assessment (EcIA); Transport Assessment (TA) by Link Engineering.
- Key Policies & Guidance: NPPF (August 2026) Policies F5 and TC3; Planning Practice Guidance (PPG); Huntingdonshire Local Plan Policy LP5 and Green Infrastructure Priority Area Designations.

Summary of Objection: The Planning & Retail Impact Assessment contains fundamental errors regarding flood risk, prior site works, site area, and parking numbers, while applying an overly rigid retail sequential test and relying on future housing growth whose cumulative traffic impacts are omitted from the Transport Assessment.

1. Flood Risk Sequential Test Failure & Contradictory Site History
1.1 Flood Zone 2 Admission & Sequential Test Failure (Page 9, Section 2.1.5 & Page 22, Policy LP5): Lanpro explicitly admits the site lies within Flood Zone 2 (medium probability of flooding). Under Local Plan Policy LP5 and the August 2026 NPPF, retail developments in Flood Zone 2 must pass a strict Flood Risk Sequential Test (demonstrating no reasonably available sites exist in Flood Zone 1). Yet Lanpro dismisses this requirement by assuming the 2023 flood-engineering consent (22/01134/FUL) converts the site to Flood Zone 1-while simultaneously admitting on Page 10 (Section 2.3.2) that "the works were never implemented, thus the permission has expired".
1.2 Direct Three-Way Contradiction on 2023 Engineering Works: Three consultants working for the exact same applicant cannot agree on whether major earthworks were ever dug on the site:
- The Design & Access Statement (Page 28) claims the 2023 drainage engineering works (22/01134/FUL) were carried out on site (and includes aerial photos showing trenches).
- The Archaeological DBA (Page 7) claims there is "no evidence of any modern impacts" on the site.
- The Planning & Retail Impact Assessment (Page 10) claims "the works were never implemented, thus the permission has expired".
2. Site Area, Parking & Green Infrastructure Discrepancies
2.1 Wrong Site Size & Conflicting Parking Breakdown:
- On Page 9 (Section 2.1.1), Lanpro states the application site extends to "approximately 1.3 acres (0.5 hectares)"-contradicting the Site Plan and EclA, which state the Lidl site is 2.2 acres (0.89 hectares) and the total site is 3.26 acres (1.319 hectares).
- On Page 19 (Section 4.1.4), Lanpro lists 101 standard parking spaces (plus 6 disabled, 9 parent & child, and 2 EV = 118 total), whereas the Transport Assessment and Site Plan list 77 standard parking spaces (and 24 passive EV bays).
2.2 Dismissal of Green Infrastructure Priority Area (Page 9, Section 2.1.6): Lanpro admits the site sits inside a designated Green Infrastructure Priority Area under the Local Plan, yet dismisses it as "not considered relevant" simply because outline housing was previously approved-ignoring that the approved housing scheme included public open space and Section 106 green-space obligations, whereas Lidl's supermarket replaces the entire field with tarmac and concrete.
3. Flawed Retail Sequential Test, Catchment & Cumulative Impact Assumptions
3.1 Flawed Sequential Test & Dismissal of Former Waitrose (Pages 32-33, Section 6.6.7): Lanpro dismisses the vacant former Waitrose store in St Benedicts Court (Huntingdon Town Centre) on the basis of rigid size and surface-parking demands, ignoring NPPF Policy TC3 and PPG guidance requiring developers to show genuine flexibility in format and scale rather than insisting on a suburban car-dominated box.
3.2 Overlooking Cumulative Traffic from 4,900 Proposed Homes Opposite (Page 40, Sections 7.2.3-7.2.6): Lanpro uses the emerging Local Plan allocation for 4,900 new homes at Lodge Farm (directly north across the A141 roundabout) to argue that future residents will shop at Lidl-yet the Transport Assessment completely fails to include those 4,900 homes or the A141 roundabout in its traffic modelling.
3.3 Shrinking Convenience Expenditure & "12-Minute Drivetime" Contradiction (Pages 41-42): Lanpro claims a Lidl serves a "compact core catchment" to downplay retail harm, yet draws a 12-minute drivetime catchment stretching all the way to St Ives-proving the store is designed to pull car-borne shoppers across the A141/A1123 network rather than serve local pedestrians. Meanwhile, Table 6.2 shows total available convenience expenditure in the catchment actually declines from £185.58m (2026) to £184.30m (2031), meaning Lidl's £10.25m turnover comes directly out of existing town-centre and local stores.
4. Conclusion & Action Requested: The Planning & Retail Impact Assessment fails both the Flood Risk Sequential Test (Local Plan Policy LP5 / NPPF Policy F5) and the Retail Sequential Test (NPPF Policy TC3), relies on inconsistent site data and contradictory site history, and diverts expenditure away from existing town-centre stores in a declining convenience market. HDC is requested to refuse the application.

Kind regards