St Neots Office

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[redacted]

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Our ref: TDK/Safford
Your ref:

17th July 2025

Kevin Simpson
Planning Services
Pathfinder House,
St Mary's St,
Huntingdon,
PE29 3TN

Dear Mr Simpson,

APPLICATION FOR PERMISSION IN PRINCIPLE FOR RESIDENTIAL DEVELOPMENT OF 2-3 RESIDENTIAL DWELLINGS AT LAND ADJACENT HOME FARM MANOR FARM ROAD WARESLEY (LPA REF: 25/01080/PIP)

I am writing on behalf of the Applicant following our recent correspondence and in response to comments received during the consultation process.

It should be noted first that there is support from the Parish Council and a local resident (Silvan House), with no objections from statutory consultees (Environmental Health or the Highways Authority) or local residents.

The Parish Council considered the application at a meeting on the 7th July 2025, and the Parish Councillors voted unanimously to declare their support for it. In justifying their decision, Parish Councillors deemed that in light of the recent Lawful Development Certificate (LPA Ref: 24/00933/CLED24), the site is located within the Built Up Area of Waresley and that "*2-3 dwellings would not have a detrimental effect on the village.*" The Applicant attended this Parish Council meeting, and noted that no concerns were raised by Parish Councillors, and they made the following key points, as summarised below:

- The site is well enclosed and comprises residential garden land, widely recognised within the village as falling within the built-up area. This position was further supported by the Planning Policy team, and there was unanimous agreement that a scheme in keeping with the character of the village would be welcomed.

- One councillor remarked that the District Council should prioritise well-supported, community-led schemes such as this, as a more appropriate strategy for addressing the five-year housing supply, rather than relying on large urban extensions or sprawling estates.

- The Councillors unanimously agreed that this scheme would be a valuable addition to the village, making effective use of infill development. The scale of the scheme was considered unlikely to have any adverse impact on traffic or utility services. Although the site is located within the conservation area, it was acknowledged that the proposed additional planting and commitment to Biodiversity Net Gain (BNG) would enhance the village's character in this location. Overall, there was consensus that the scheme would be beneficial for the village.

The main purpose of the remainder of this letter is to further set out the planning case in response to concerns raised by the Planning Officer. The comments raised below should be considered in the context of the following National Planning Practice Guidance (NPPG) in respect of the scope for Permission in Principle applications:

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*"The scope of permission in principle is **limited to location, land use and amount of development**. Issues relevant to these 'in principle' matters should be considered at the permission-in-principle stage. Other matters should be considered at the technical details consent stage."*[1]

Location

In paragraphs 5.5 to 5.18 of the submitted Planning Statement, it is clearly set out why the site is considered to lie within the built-up area of Waresley. As mentioned above, the Parish Council also agree with this assessment, along with the Planning Policy Team's Sustainability Appraisal (SA) response for this submitted site (Waresley-cum-Tetworth 1) that it is "*located on the northern edge of Waresley within the main built form.*"

Given that it has been established that the proposal is within the Built-Up Area of Waresley, it should be considered within the context of 'development proposals within the built-up Area' as set out below in the policy extract for Policy LP 9.

LP 9

Small Settlements

Each Small Settlement to which this policy applies is defined above.

Development Proposals within the Built-up Area

A proposal that is located within a built-up area of a Small Settlement will be supported where the amount and location of development proposed is sustainable in relation to the:

a. level of service and infrastructure provision within the settlement;
b. opportunities for users of the proposed development to access everyday services and facilities by sustainable modes of travel including walking, cycling and public transport;
c. effect on the character of the immediate locality and the settlement as a whole.

As highlighted above, Policy LP 9 'supports' new development within an established built-up area and is the starting point, before the 'amount' and appropriateness of the 'location' are controlled by limbs a to c of the policy. The limbs a to c do not state that no development within a 'built up area' is allowed, but rather whether the location and quantum are appropriate to a particular location.

The following supporting text to the policy provides further guidance on this, with relevant text highlighted in bold and appropriate commentary provided underneath the extracts.

4.102- *"The potential benefits of promoting some growth within Small Settlements include helping to create a more balanced and diverse local population; enabling young people to stay in the communities they grew up in; and providing opportunities for older people seeking to move into more accessible housing within the community. **It can also help sustain the available services and facilities by maintaining population numbers helping to address the particular challenge of declining rural populations relating to falling household sizes. Growth can help support a living, working countryside capable of adapting to changing needs**. Development in Small Settlements will typically comprise smaller sites providing a range of opportunities for small builders and those wishing to build or commission their own homes."*

Waresley is considered to be a reasonably sustainable location, and the Officer's Report for a nearby approved dwelling at Land East Of Fairfield House, Manor Farm Road, Waresley (22/00945/FUL) stated that:

"Waresley has several existing local services and facilities - a public house, church, village hall and garden centre. The village is served by the No.C2 bus service, which connects the village with St.Neots once a week. As such, the village is considered to be reasonably sustainable and occupiers would not have to rely on private vehicles to access basic day to day amenities."

[1] Paragraph: 012 Reference ID: 58-012-20180615

Moreover, paragraph 4.102 highlights the importance of small-scale development in Small Settlements, such as Waresley, to assist with enhancing and maintaining the vitality of rural communities in line with NPPF Paragraph 83. In this context, it should also be noted that the village public house, the Duncombe Arms (Grade II Listed), has been closed for over a year. It is understood that a new owner has purchased the public house, and it is due to re-open shortly. Moreover, the proposal would support other services and facilities in the village, including the Garden Centre (featuring a farm shop and café), Waresley Park Estate (with a café and Wellness Centre), the cricket club, and community functions at the village hall and church. The delivery of new housing in the village could assist in revitalising and sustaining these community assets, as supported by Parish Councillors and local residents.

The proposal will also support services and facilities in these surrounding villages, including a convenience store, nursery, and primary school in Gamlingay, as well as public houses, restaurants, sports and leisure facilities, a GP Surgery, a pharmacy, and employment opportunities. Further services and facilities are located in Abbotsley and Great Gransden and Little Gransden ("The Gransdens"), including further public houses, a primary school and a convenience store. The catchment school in Great Gransden is currently under capacity, so children from the development would attend this school, thereby supporting the school's sustainability.

With its rural location, there will be a reliance on a private motor vehicle. Nonetheless, it is possible to access local facilities and services either on foot or by bicycle, with the majority of Manor Farm Road featuring maintained grass verges that are commonly used by pedestrians. The road benefits from numerous informal passing places. Although Manor Farm Road is a through-route and vehicle numbers cannot be strictly controlled, observations suggest that most drivers travel at or below 20mph. The road remains relatively quiet, and the presence of grass verges along much of its length provides a safe and practical option for pedestrians. A bus stop is within close walking distance (0.5 miles) of the site, which provides a bus service to St Neots and surrounding villages, and the village is also served by the "Tiger On-Demand" bus service.

With reference to point 4.102, concerning the objective of enabling young people to remain in the village, it is important to highlight that the site has already attracted interest from prospective local residents wishing to relocate within the village after previously moving away due to a shortage of appropriate housing stock. Similarly, there has been interest from current residents looking to downsize, who are keen to remain within the community.

Regarding the effect on the character of the area, the site is well enclosed by a combination of trees and hedgerows. The SA response for the site states that "*some development on the eastern part of the site (0.94ha) which is in use as grassed amenity land could be of a scale that could be integrated into the existing place and community.*" It is also worth noting that the Applicant has already discussed planting schemes with neighbouring residents to provide additional screening and protection. These neighbours will take ownership of the relevant parcels of land upon completion, offering long-term certainty over their future management. The proposals will result in a significant net gain in biodiversity (BNG).

<u>Amount of Development</u>

The supporting text to Policy LP 9 also provides guidance on determining the appropriate scale for a site located within a built-up area.

4.104 *"It is recognised that opportunities for development within the built-up areas of Small Settlements will vary according to the scale and nature of the individual settlement. However, this is considered appropriate as it reflects the differing range of services, facilities and infrastructure available. A Small Settlement which offers a range of services such as a shop, village hall, public house and primary school offers far greater opportunities in principle for sustainable development than a* ***Small Settlement with few or no services or facilities where only very small scale development opportunities are likely to be sustainable.****"*

The proposed site capacity was carefully considered in collaboration with the Applicant during the preparation of this application. Taking into account the relevant supporting text (as outlined above), it

was concluded that a development of 2–3 dwellings would be appropriate and proportionate to the sustainability of the location.

Moreover, as highlighted above, the Parish Council consider this to be an appropriate scale of development, and the SA response also indicated that it would be appropriate to have some development within the grassed amenity area.

Other Matters

On a separate note, we wish to raise concerns regarding the suggested decision-making process referenced in your email dated 17th July 2025, specifically the indication that 'pending' PiP application sites not dismissed through the Call for Sites process will be subject to further discussions with the Planning Policy Team. Our concern relates to the potential use of a shadow policy framework, one that has not been subject to public consultation and does not form part of the adopted Development Plan, as a basis for assessing this and other similar planning applications. Each planning application must be considered on its own merits and in accordance with the statutory development plan, unless there are material considerations that indicate otherwise.

In this context, we refer to paragraph 11(d) of the National Planning Policy Framework, which makes clear that where the most important policies for determining an application are out of date, a tilted balance should be applied. Specifically, part ii) requires that planning permission should be granted unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*"

Given the pressing need to boost the supply of housing, the delivery of additional homes should be afforded substantial weight. As outlined in the accompanying Planning Statement, the benefits of the proposal, including the provision of new housing, clearly outweigh any identified harm or conflict with the current development plan.

The Applicant has some reservations regarding the need for an extension of time, particularly given that the purpose of the Permission in Principle (PiP) application route is to expedite the planning process. Notwithstanding this, the Applicant is willing to agree to an extension of time until 1st August 2025, on the clear understanding that this will not serve as a placeholder and that no further extensions of time will be sought.

I would be happy to discuss the contents of this letter in more detail by phone at your convenience.

Yours sincerely,

