

## HOUGHTON & WYTON PARISH COUNCIL

### Planning Submission Comments: Application 1301056OUT, Land between Houghton Grange and The How

1. Houghton & Wyton Parish Council believe the application for outline planning permission is incomplete and therefore should be rejected outright and not considered at present for the following reasons:
  - 1.1 To consider the application would constitute pre-maturity of the Local Plan but more importantly of the Houghton & Wyton Neighbourhood Plan. If approved, even in outline, the impact would be to remove strategic choices for the village and Houghton Grange. A decision now would remove the preferred option within the Neighbourhood Plan which is to integrate Houghton Grange within the village community and the built up area of the village rather than linking it forever with the townscape.
  - 1.2 In our opinion the site urgently requires an Environmental Impact Assessment before outline planning permission can be considered. The reasons given by officers during the screening phase for determining whether an EIA should be undertaken are inadequate and largely treat it as a 'stand alone' site. The evidence shows that far from being a stand-alone site that this application forms part of a much larger contiguous development proposal. The very timing of when this application has been brought forward for consultation along with 3 other applications, the mapping contained within it and showing the linkage through to the other proposed sites, the requirement to share the access from the A1123 currently only granted for Houghton Grange all point to this fact. As such all of the questions to determine whether an EIA is required needed to be considered in conjunction with planning applications 1301895OUT, 1201890FUL, 1201891FUL and the outline permission granted for Houghton Grange.
  - 1.3 This is a particularly sensitive site and there is still no detailed lighting plan nor CC Highways despite being offered in the original application and requested by Mr Paul Allen HDC's Project and Assets manager as well as Cambs Police.
  - 1.4 Likewise there is no CC Highways Traffic impact assessment accompanying this application.
  - 1.5 Houghton & Wyton Parish Council believe the application also requires listed building consent for the proposed demolition of the POW Huts/Chicken sheds on the site as these were automatically listed as part of the pre 1<sup>st</sup> July 1948 automatic listing of the Houghton Grange estate. The huts have been intimately connected with the property from their POW use when the Grange housed guards through to more recent times when used to house the chickens for laboratory and experimentation work taking place in the main house. Again this is missing.

The English Heritage definition states:

*"Any pre 1948 building is protected .....the exterior and interior [of the building] ... any object or structure fixed to the building, and any object or structure within the curtilage of the building, which although not fixed to the building, forms part of the land and has done so since before 1 July 1948"*

It is also worth quoting from English Heritage that it is a criminal offence not to seek listed building consent when it is required. Not knowing a building is listed is not a defence to any criminal proceedings. This makes it very important that any doubt is investigated and discussed with the local planning authority. It is also not a defence to

show that consent would or should have been given if it had been applied for.

1.6 The draft Local Plan raises questions about solutions for the water treatment capacity for the St.Ives catchment which have still not been identified or addressed.

2. Based upon the incomplete application, we have provided detailed reasons for rejecting the planning application using material planning guidance as set out below:

<b>Material Planning Consideration</b>	<b>Comment</b>	<b>Supporting Evidence</b>
<p>An important and historic precedent exists of protecting and <u>NOT</u> building upon the BBSRC field:</p> <p>The principle of green buffer between St Ives and Houghton exists.</p> <p>Building upon this space would remove the gap resulting in coalescing of town and village.</p> <p>Loss of separate identities, valuable green space and important landscape.</p>	<p>The importance of maintaining a separation of town and village is long established.</p> <p>The gap is carefully defined as east of Houghton Grange - since any land to the west lies within the village itself rather than between, and comprises gardens, which at the time were classified as brown field sites and could not therefore offer adequate protection from development).</p> <p>It is emphasised by the Inspector that a new junction and access road from the A1123 is to <u>only</u> service Houghton Grange and the council should <u>not</u> be tempted to use it to justify more housing development in the green gap. The District Council promise to protect the gap.</p> <p>Further confirmation, definition and protection of the gap emerge in a master plan for the area.</p> <p>The BBSRC field is included within the best landscape definition. The District Council state 'they will not normally grant permission for development which would adversely affect the character of the Area of Best Landscape '.</p> <p>Concern expressed over extent of urban development which in some cases has led to incorporation of previously distinct settlements within larger urban areas such as Eaton Socon (St.Neots) and Hartford</p>	<p>Local Plan 1995 St Ives Development Brief 2000.</p> <p>2002 Local Plan (Alteration) and Inspectors report.</p> <p>Section 2.4 of the Inspectors report on the Local Plan 2002 (alteration)</p> <p>2005 St.Ives West UDF</p> <p>2007 Hunts Townscapes &amp; Landscapes SPD. <i>Policy En21</i></p> <p>Local development Framework Sustainability Report 2007</p>

	<p>(Huntingdon).</p> <p>Parish Plan published highlighting greatest concerns of over development threatening the village identity and associated issues with the A1123. 'Keep the village a village do not blend into St.Ives.' was the clear message.</p> <p>The Inspector of the 2009 Core Strategy states 'that separation between St.Ives and Houghton should be retained' and that it is to 'the Spatial Planning Areas to which development is directed' – the BBSRC field being the first and only piece of land between the SPA (as defined in the 2009 Core Strategy) and the village, and which has historically been defined as the gap.</p> <p>The HDC Draft Local Plan Consultation proposes some key policies for the protection of the special character and separate identities of Huntingdonshire's villages, as well as the protection and enhancement of green infrastructure.</p> <p>Development here would potentially harm the gateway to the west of the town, would visually intrusive, have a significant impact upon the landscape, attractiveness and character of the surrounding area.</p>	<p>2009 Parish Plan</p> <p>Inspectors report on the 2009 Core Strategy (section 3.20)</p> <p>Policy LP1 Strategy and principles for development Policy LP4 – Enabled Exceptions Policy LP7 Strategic Green Infrastructure Policy LP10 Development in Small Settlements</p>
<p>The Core Strategy 2009 could never have intended development to take place on the BBSRC field - despite the direction of growth arrow.</p>	<p>The adopted Core Strategy 2009 follows straight after the adoption of the boundary review of 2008.</p> <p>This moved the BBSRC field from out of the St.Ives Spatial Planning Area to within the parish of Houghton &amp; Wyton. The rationale given was to reflect that it belonged to the village/countryside rather than an urban townscape and stated that it fell outside of any development proposals for St.Ives.</p> <p>When commenting upon the Core Strategy, the Inspector, stated that separation between St.Ives and Houghton 'should be retained' (not moved); that new development should 'link' (not abut) existing developments; that new development should be wholly 'within the St.Ives Spatial Planning Area' and which was defined by</p>	<p>2008 Boundary Review which went through 3 stages of consultation was signed off by the Secretary of State and adopted by the council in 2008.</p> <p>Inspectors report (section 3.20) on 2009 Core Strategy. The Inspectors comments are legally binding.</p>

	<p>excluding Houghton &amp; Wyton. Commenting upon the direction of growth he states 'it is the Spatial Planning Areas to which development is directed'.</p> <p>The overarching objectives and policies within the Core Strategy also look to conserve the special character and separate identities of Huntingdonshire's villages. 'There should be no harm to spaces which contribute to the distinctive form, character and setting of a settlement'.</p>	<p>Core Strategy 2009 Objective 10: Policy CS1 Sustainable Development, En7 Protection of Open Space.</p>
<p>The suggestion that somehow the Core Strategy could be interpreted to allow support for development on the BBSRC was pursued with vigour in the 2012 St.Ives West UDF and found wanting.</p>	<p>This flawed document proposed moving the gap to the west of Houghton Grange. The green gap has never previously been defined as west of The Grange and hence part of the village – it has always been defined as between Houghton Grange and town. Village gardens lie immediately to the west of Houghton Grange and when the Core Strategy was written were classified as brown field sites, incapable of offering the necessary protection.</p> <p>The BBSRC field was NOT allocated for housing within the 2009 Core Strategy.</p>	<p>2013 Quashing of St Ives West UDF in High Court</p>
<p>National Planning Guidance/Policy looks to protect the intrinsic character and beauty of the countryside and promotes brown field development.</p>	<p>The BBSRC field is a green field site. It occupies high ground above the Ouse Valley and is part of a unique and rare landscape within Huntingdonshire.</p>	<p>NPPF. Paras 109, 110,115, 116, Promotes brownfield sites; para 17 supports rural economy; para 28 minimises transport; Local green spaces policy as greenbelts</p>
<p>The emerging Neighbourhood Plan places a high value upon this landscape and its part in the sustainability of the local area.</p>	<p>In 2012 Houghton and Wyton formally designated as Neighbourhood Planning Area and given its importance both in terms of a green wedge between town and village as well as its historic, environmental and landscape value is proposing designating the BBSRC field as Local Green Space.</p> <p>The Neighbourhood Plan looks to strengthen further the incorporation of Houghton Grange into the envelope of the village and fulfil the housing need which the community has defined. As such the</p>	<p>Localism Act gives local communities opportunity to plan their own area</p> <p>Houghton &amp; Wyton Draft Neighbourhood Plan</p>

	<p>Neighbourhood Plan defines Houghton Grange as part of the built up area of the village and in doing so relies upon the BBSRC field to continue to perform as the green wedge between the town and village.</p>	
<p>Views of this precious landscape will be severely compromised by this development.</p> <p>Note: It has not been possible to comment on the lighting plan as this is missing from the planning application documentation.</p>	<p>The BBSRC field forms part of a landscape backdrop to the historic town of St.Ives looking west (particularly the Old Town Bridge and viaduct), the Great Ouse meadows from the south and the Hemingfords.</p> <p>The uninterrupted tree lined hill view forms a rich part of the setting of the Old Town Bridge in St. Ives a medieval bridge and classified as an ancient monument of national importance.</p> <p>Likewise the same is true of Hemingford Grey Manor a grade 1 listed building.</p> <p>Day and Night time views will be significantly affected by the sight of roofs, solar panel reflections positioned facing south, and light pollution from external lighting for footpaths, roads and cycle ways, lights from houses and vehicles from dusk until dawn.</p> <p>Most of the natural tree screening comes from the ancient Thicket woodland which is mainly deciduous.</p> <p>With thinning which has already taken place due to the lack of a strategic management plan for the Thicket, roof tops and buildings for the school, How, Houghton Grange and now Green Acres are already visible. It will not be possible to hide tens of let alone hundreds of new houses.</p> <p>This is especially true even now in autumn and winter when leaves fall as well as at night when house, car and street light pollution will be very visible from a long way.</p> <p>Finally, the threat of Ash die back presents</p>	<p>GIS/ Photographic evidence of significant views into the site.</p> <p>HDC's now quashed St. Ives west UDF which makes special mentions of the outstanding views both out of and into the site.</p> <p>English Heritage listings records</p> <p>HDC Country Parks department.</p>

	a 50 – 60 year problem. 70% of the Thicket is Ash and is likely to be affected at some stage.	
The presumption in favour of development within NPPF is removed if there is significant harm to ancient monuments or listed buildings.	This includes settings and requires that the benefits of development must be proven to outweigh the harm. See above	English Heritage Listing status. Old Town Bridge (St.Ives) and Hemingford Grey Manor setting
Traffic congestion is already causing major problems.  (Note the latest response from CCC Highways was omitted from this application)	<p>The traffic assessment model takes figures from a study done on the 14th June 2012 and models the effects of journeys from additional houses.</p> <p>It makes assumptions that 10% of the traffic increase will switch to using the guided bus, cycling or walking. It assumes no transfer of traffic between the BBSRC field site and Green Acres and no variability in the traffic flows on the A1123 other than what occurred on the 14<sup>th</sup> June when the survey was done. It assumes quite limited disruption from use of the pelican crossing for school children and also for some reason assumes c2% of journey's leave the site by train. It also takes no account of any affect from Wyton on the Hill being developed.</p> <p>The model shows that when the developments west of St.Ives are completed, there will be a 20% increase in traffic movements during peak morning times, at key junctions along the A1123 (particularly with Sawtry Way and the Houghton Grange junction itself), maximum queue lengths will increase 3.5 times from what they are today and a car will pass by every 2 seconds.</p> <p>If we add back the 10% switch to bus, bike and foot, then we will see a car pass every 1.8 seconds.</p> <p>Add a 30% variability in traffic flows (often determined by the A14) and we would see a car every 1.5 seconds. There will be little or no chance to leave the village or for that matter cross the road without stopping the traffic, which will then trigger the queuing.</p> <p>In 2011, CCC Highways recorded c17,000</p>	<p>Draft Local Plan and development of the Old Golf Course and RAF Wyton</p> <p>2011 CCC HW report</p>

	<p>journey's per day at the Hartford and St.Ives end of the A1123 making it one of the busiest roads in Huntingdonshire. They stated that even without any further development, the A1123 would be over its capacity by 2017.</p> <p>In total with this development, we could see in excess of 20,000 vehicle movements per day across the entrance to the village or at times with a 30% variability added around c26,000 movements.</p> <p>In addition, the 190 houses proposed for the Old Golf Course and 3750 for RAF Wyton have not been taken into account. An overall master plan for the area is required before making decisions about this application.</p> <p>We believe additional traffic modelling is required covering alternatives to the current assumptions and showing a more realistic range of likely outcomes.</p>	<p>re Houghton Grange.</p>
<p>Increases in pollution must be calculated and considered.</p>	<p>HDC has already been criticised for not having meaningful pollution targets.</p> <p>Queuing cars on a hill is proven to be one of the worst situations for increasing levels of pollution. There will be a significantly increased risk of this given the increased level of traffic generated from developing this site.</p> <p>Heavy and long periods of queuing traffic of this kind will do nothing to deliver the sustainable future it aims to achieve. In planning parlance the residual cumulative impact upon air quality, health and quality of life will be severe.</p>	<p>The Cambridgeshire Local Transport Plan quotes avoiding increases in noise, dirt, fumes and air pollution. CO2 which is considered one of the biggest global threats.</p>
<p>The Water Management system for the St.Ives area is already recognised as stretched and whilst</p>	<p>The Environment Agency are already having to issue certificates for discharge levels over and above normal acceptable levels.</p>	<p>Draft Local Plan 2013</p>

<p>technical solutions are possible, the actual solution, costs and timing of these is unknown.</p> <p>No approvals to any scale development should be made until acceptable solutions are recognised.</p>	<p>Anglia Water are still completing a study of water treatment requirements for the whole of the area but have said they will support this outline application only to be able insist upon appropriate conditions as well as to negotiate a settlement for the extra capacity that will be required.</p> <p>The criteria for water quality are likely to increase should the area be designated an AONB.</p>	<p>Anglia Water Study</p>
<p>Sustainability:</p>	<p>NPPF requires that Councils take a holistic view of the sustainability of any development which includes the likely impact on the wider surrounding area.</p> <p>The inclusion of a shop on site will have a detrimental effect upon trading at the local village shop in Houghton. It is estimated by the owner that he may experience a -15% fall. This could threaten the very survival of the shop.</p> <p>The village has for some time wanted a guided bus stop. However the creation of a larger settlement on the edge of the village will reduce the chances of a bus company wanting to operate such stop within the village and so perversely lead to increased isolation of its residents.</p> <p>The landscape draws c200,000 people to the village each year and many more if the surrounding area and villages are considered. They come for the beauty, walks and tranquillity primarily offered by the setting of the Great Ouse meadows. This is valuable amenity and vitally important to the local economy and quality of life that nothing threatens this quiet tourism. The land forms the backdrop to the meadows and must be protected and enhanced.</p> <p>Natural England have invited a proposal to designate the area as a potential Area of Outstanding Natural Beauty to be considered at the end of 2013.</p>	<p>NPPF</p> <p>Houghton &amp; Wyton emerging Neighbourhood Plan</p> <p>Natural England</p>
<p>The land in question is of offers an uninterrupted link from the flood plain to high ground and offers real</p>	<p>The Habitat Study that accompanies the application is very superficial – consisting of record searches from around the area and a walk of the site which took place on 12<sup>th</sup> March. It makes the case itself for the need</p>	<p>Lowland mixed deciduous woodland is a UKBAP habitat and principle habitat of importance under</p>

<p>value in terms of biodiversity.</p> <p>The land adjoins an area of ancient lowland and mixed deciduous woodland which is a material consideration in planning process and should be considered carefully.</p>	<p>to undertake a more detailed investigation into what is present and states that the site 'should be considered of some local biodiversity value' sitting within 250m of a SSSI site and within 2 km of 10 non statutory sites. It provides a much needed mosaic of different habitats.</p> <p>From the records it found reports from land nearby and adjoining the site of a medium population of Great Crested newts and probably traversing it, Common Toads, Badgers, 8 species of bat, Brown Hare and Hedgehog, 45 species of birds nearby, 38 invertebrates, grass snakes as well as flowering plants and trees and hedgerows. The lowland mixed deciduous woodland of the Hillside and Thicket is of particular importance.</p>	<p>section 41 of the Environment and Rural Communities (NERC) Act 2006.</p>
<p>Agricultural / Pasture Land loss</p>	<p>The land is Greenfield land and good quality – the plateau being most likely grade 2 as per Houghton Hill farm immediately opposite.</p> <p>As originally part of the Houghton Grange estate and gardens, maps show the BBSRC has supported orchards and market gardening. The southern facing slope also adds to the value for horticulture.</p> <p>Farmers locally have expressed concern over the shortage of good quality pasture land available locally all year round.</p> <p>Development of the plateau, would take away the highest grade agricultural land on this site and threatens to create an imbalance between the requirement to graze and maintain the lowland meadow and provision of adequate higher ground pasture during winter / flooding.</p> <p>We have also questioned why the assessment criteria for the value of the land only measured on its agricultural grading? The high land between Houghton and St.Ives is particularly valuable in terms of tourism for the stunning tree clad backdrop it creates to the meadows. The Houghton mill car park attracts over 120,000 visitors per year who use it to gain access to this area of the Great Ouse Valley.</p>	

<p>Lack of Environmental Impact Assessment</p>	<p>In January 2013 District Council planning officers concluded that an EIA was not necessary. This seems to have been achieved by effectively treating this as a single stand alone application for the purposes of EIA assessment. Despite answering yes to the questions - are there potential cumulative impacts with other developments? and should it be considered as an integral part of a more substantial project?, the officers somehow concluded that the cumulative effect was not significant in EIA terms.</p> <p>Combined with the adjoining planning applications , this has to be considered a major development for the area. It represents a growth of c10% to the housing stock of the town and a c40% increase in the size of the parish of Houghton &amp; Wyton. Furthermore it creates a conurbation by merging with the neighbouring village. As mentioned earlier – it removes the preferred option to incorporate Houghton Grange within a village setting and maintain a gap between town and village.</p> <p>Given the importance of tourism in the area, it is of more than local importance. With only limited river crossings, the area suffers from higher levels of through traffic, plus the A1123 which passes the site is recognised as the major relief road for this section of the nationally important A14.</p> <p>The location is environmentally sensitive sitting next to SSI, CWS, Conservation Area, adjoining a body of rare and ancient woodland (the Thicket) as well as the important Great Ouse Meadows which represent c15% of what remains of England’s flood meadows and are subject of an application to become an AONB.</p> <p>Being the only significant high ground on a valley edge in the area, it is very scarce. It takes away valuable land both in terms of agriculture, but also important habitat for wildlife (it also offers high ground relief during flooding) and the function it performs given its high level scenic quality as part of our quiet tourism offer.</p>	<p>Town and Country Planning Environmental Impact Assessment Regulations 2011/92/EU</p>
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Alternative sites:	There are many alternative sites which if assessed properly and fairly, offer much better and more sustainable growth solutions for the development of St.Ives.	See map attached.