



East Cambridgeshire
District Council

East Cambridgeshire Local Plan

Further Draft Consultation:

Key Issues Raised

May 2017

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Further Draft Consultation: Report on Key Issues Raised

1. Introduction

Further Draft Local Plan Consultation

- 1.1 Consultation on the Further Draft version of the East Cambridgeshire Local Plan took place between 12 January and 22 February 2017. This was the second stage of public consultation, undertaken to inform the emerging Local Plan.
- 1.2 The timeframe for the production and adoption of the East Cambridgeshire Local Plan is scheduled to be as follows:

Stage of Local Plan Preparation	Date
First Draft of Local Plan for consultation (<i>Preliminary Draft Local Plan</i>)	February – March 2016 <input checked="" type="checkbox"/>
Second Draft of Local Plan for consultation (<i>Further Draft Local Plan</i>)	January – February 2017 <input checked="" type="checkbox"/>
Final Draft Local Plan for consultation (<i>Proposed Submission Draft Local Plan</i>)	November – December 2017
Examination of Local Plan	Spring 2018 (subject to change)
Adoption of Local Plan	September 2018 (subject to change)

- 1.3 The East Cambridgeshire Strategic Planning Team wishes to thank all those who took the time to comment during the consultation on the Further Draft Local Plan.

Purpose of Key Issues Report

- 1.4 This report identifies and presents key issues, concerns or other important matters raised during the January – February 2017 consultation on the Further Draft Local Plan. The report is intended as a summary and does not contain every detailed comment made. All comments received will be considered fully and in detail as we prepare the next draft of the East Cambridgeshire Local Plan.
- 1.5 If you would like to read the detailed comments made during the consultation on the Further Draft Local Plan, including those submitted via post or email, please visit our online consultation portal¹.
- 1.6 A response to each of the key issues highlighted is not included in this report. All issues raised are still being carefully considered together with other relevant considerations, such as national planning policy. We will publish an Evidence Report for each of the Further Draft Local Plan policies on our website, in due course. These Evidence Reports will include commentary on how we have considered representations in finalising the next version of the Local Plan.

¹ Available at: <http://eastcams-consult.objective.co.uk/portal>.

Additional Site Suggestions

- 1.7 During the Further Draft Local Plan consultation, a number of additional sites were suggested for our consideration as possible options for future development. These new site proposals are currently being assessed to determine their suitability for inclusion in the Local Plan.
- 1.8 In March 2017, we published on our website a report outlining all Additional Site Suggestions received². Whilst this Key Issues Report identifies those settlements where Additional Site Suggestions were submitted, for further details on each additional site proposal please refer to the Additional Site Suggestions Report.
- 1.9 A small number of additional changes to Development Envelopes and additional suggested Local Green Spaces were received during the consultation. These submissions are noted within the relevant section of this Key Issues Report. Full details of such submissions can be viewed on the online consultation portal.

Document Structure

- 1.10 Following the introductory section, part 2 of this Key Issues Report presents a series of tables. Each table corresponds with a specific chapter (including settlement chapters for each town or village), section or draft policy of the Further Draft Local Plan. The tables provide bulleted lists of key issues raised by respondents during the consultation period.
- 1.11 For a summary of comments made in respect of a site (whether proposed for allocation in the draft plan or otherwise), please see the corresponding table for the town or village in which the site is located.
- 1.12 To locate a specific table of key issues, please refer to the report's contents page.

² See Additional Site Suggestions Report March 2017 (doc ref: 033) at: <https://www.eastcambs.gov.uk/local-development-framework/local-plan-review-document-library-0>

2. Summary of key issues raised during the Further Draft consultation

Note: all references to section, paragraph and policy numbers are to those in the Further Draft (February 2017) version of the East Cambridgeshire Local Plan.

Foreword
Summary of issues raised
<ul style="list-style-type: none">• Concern about housing completions figures in the Local Plan may be incorrect due to the huge development in Fordham.• Need to consider the impact of the vision to increase in housing completions on the infrastructure and schooling in the area.

Chapter 1: Introduction
Summary of issues raised
<ul style="list-style-type: none">• Concerns expressed about the comments made by local people have been ignored in the past.• Time scale of the Local Plan needs to be consistent in the document.• It is considered the document is too large and would put most people off from reading it.

Chapter 2: Introducing East Cambridgeshire
Summary of issues raised
<ul style="list-style-type: none">• General support for this section with some changes suggested to the text to reflect current situation. Some praise for Ely Cathedral is merited.• Comments made regarding the need of infrastructure provision to keep pace with development.• Agricultural land is needed to produce food and employ local workforce.• The title “inclusive communities” could be misleading and may be replaced with “strong communities” or “resilient communities”.• Concerns expressed that transport links are poorer than described and this should be reflected.• An important issue of meeting future housing needs is missing from the table of objectives set out at Paragraph 2.1.10.• Suggestion made to re-wording on an objective to read as “1. Minimise the irreversible loss of the highest quality agricultural land and productive agricultural holdings.”• Paragraph 2.1.6 –could include ancient woodlands.• Update number of conservation areas to 28 and to delete the word Ancient to scheduled monuments throughout the Plan. It would be helpful to include the number of assets on the Heritage at Risk Register, currently there are 16.• Sustainability Appraisal, in relation to exportation of 1,500 dwellings to Peterborough, this could lead to negative effects in terms of social elements of Sustainability.• The level of development should be limited to the level of water consumption is supportable by natural processes and storage systems.• Infrastructure is considered as a key topic for the area along with flood risk/surface water

which could be included in this section.

2.2 The Vision

Summary of issues raised

- Reference to the conservation and enhancement of the historic environment is supported.
- The Plan need to include housing for the over 60s.
- The Vision set out in section 2.2 is broadly consistent with the Local Transport Plan 3 for Cambridgeshire and the emerging Transport Strategy for East Cambridgeshire.
- Need to identify and promotes sustainable sites than can be brought forward to support the development in order to achieve the Vision.
- Reference to flood protection investment should be included in the plan to ensure people living in the District will be protected

2.3 Monitoring and Review

Summary of issues raised

- Concern about the robustness of the strategy as it could end up not meeting "local" housing needs.

Chapter 3: A Growing East Cambridgeshire

Summary of issues raised

- General support for this section as it is founded upon up-to-date evidence, and picks up on the Government's new household forecast data of July 2016.
- Most neighbouring councils support 'Memorandum of Cooperation' which requires Peterborough to accommodate 1,500 new dwellings from East Cambridgeshire's growth.
- Some support for the Council's approach to distribution of growth on a 'broadly proportionate' basis.
- Some concern regarding the potential impacts of growth on the green infrastructure network and the need for further consideration of cross-boundary effects from development.
- Concerns about robustness for assessment of land required for employment purposes. In the light of NPPF, there should be no artificial limit on job numbers or employment imposed by any 'fixed' level or ceiling of new employment land.
- Some support for concentrating new development where infrastructure can be more efficiently provided and sustained; for example older people's residential care.
- Concerns expressed about the draft Plan to distribute growth across the District with a range of settlements taking a proportionate share of the new development. There will be major implications for the delivery of school places.
- The Cambridgeshire Green Infrastructure Strategy requires review and updating to serve the level of growth coming forward across Cambridgeshire.
- Some amendments to paragraph 3.3.8, is suggested as Community Land Trust (CLT) schemes can be on both allocated and non-allocated sites.
- Local Plan needs to be flexible to respond to market conditions and change in circumstances and if necessary swift revision.

Policy LP1: A Presumption in Favour of Sustainable Development
Summary of issues raised
<ul style="list-style-type: none"> • General support for this policy. Growth should be supported by required infrastructure. • Some concern that the Screening Report for the Habitats Regulations Assessment has adequately assessed the combined effects of increased recreational pressures from all developments which may be considered significant. Wicken Fen (& Chippenham Fen), Ouse Washes, Devil's Dyke and Breckland could be affected. • Need to preserve ancient woods which are irreplaceable. With only 2.4% of the land area in Great Britain covered by ancient woodland. • Some consider that Littleport has too much housing growth that is unlikely to be delivered. Some of this housing growth could be distributed in line with the Growth Study. • The concept of 'material considerations', could include extant planning permission/s, positive pre application discussions and proposals for allocated or unallocated sites and viability requirements associated with sites.
Policy LP2: Level and Distribution of Growth
Summary of issues raised
<ul style="list-style-type: none"> • Considerable support for the policy although some variation to the wording of the policy are proposed. General support for the level of housing and job growth proposed in the policy including some from neighbouring. • Some concerned expressed over the high housing growth for Soham and this is not in line with the strategy of "proportional growth across the district". • Concerns expressed about too many houses are proposed without the necessary infrastructure to support these. • It would be better to concentrate development so that adequate transport and facilities infrastructure can be funded by developers. • The strategy of transferring 1,500 dwellings to Peterborough provides no assistance to those with a need for housing and affordable housing in the villages in the southern part of the District. • Concern that the housing target may need to increase following the outcome of the objectively assessed housing need for Cambridge and South Cambridgeshire, East Cambridgeshire may need to meet some unmet needs from these areas. • Policy LP2 which sets out the strategy for growth for housing is not based on a proportionate evidence, it may be necessary for the plan to allocate a further 4,594 dwellings. • Policy LP2 figure of 11,400 for new dwellings, should be replaced with the figure of 12,900 in order to ensure that the emerging Local Plan is consistent with the NPPF. • In line with NPPF paragraph 52, the "Garden City" option has not been tested as an alternative growth option in the East Cambridgeshire Growth study. • It is considered that the exportation of 1,500 dwellings to Peterborough, outside the Housing Market Area, does not comply with the NPPF or the PPG. The Plan should seek to meet the Full Objectively Assessed Housing Need in full within the District. • Housing distribution should be modified to increase the level of growth to south of the district, to ensure housing needs are met closer to Cambridge. • 'Memorandum of Cooperation' between Peterborough and the Cambridgeshire authorities was for the period between 2011 and 2031 whereas the East Cambridgeshire Local Plan period runs from 2014-2036.

- It would appear that LP2 is incompatible with LP24 as it does not ‘minimize the need for travel’, nor does it ‘maximize sustainable means of travel’.
- ECDC has to deliver its objectively assessed housing need before assuming housing needs are to be met elsewhere. 1,500 of the additional dwellings proposed in Peterborough would be likely to contribute to unsustainable patterns of movement, and fail to meet the needs ECDC residents.
- Policy LP2 is not based on a proportionate evidence base, as required by para 182 of the National Planning Policy Framework (NPPF), and is therefore considered to be unsound.
- The Housing White Paper highlights the need to increase housing delivery and encourages development at small and medium sized sites partly because they are less complex and can come forward quickly.

Policy LP3: The Settlement Hierarchy and the Countryside

Summary of issues raised

- Considerable support for this policy from developers who are promoting sites in the villages including Dullingham, Lode, Fordham, Ely, Wicken, Witchford, Isleham, Sutton, Littleport.
- The Settlement Hierarchy should also consider the impact of viability and market conditions, which will result in sites in the right locations coming forward.
- 193 standard letter objections to KEN.M1 site.
- Residential development should be dictated by the settlement hierarchy but this is not always the case.
- Considerable objection to major development at Kennett – development not in accordance with settlement hierarchy, medium village lacks infrastructure and facilities,
- To improve deliverability, smaller sites should be allocated and distributed through the hierarchy.
- Public transport in rural areas would need to be improved to make commuting to work possible.
- Witchford is large village as in population but lacks the facilities.
- Burwell should be considered as a main settlement rather than a large village due to large range of facilities and services located in the village.
- Object to Wentworth designated as a small village. Wentworth should be medium village due to its good connection to local infrastructure and should be allocated additional growth.
- Kennett is classified as medium village due to having a primary school. Only 25% of the children are from Kennett and the growth proposed for the village (4x current housing stock) is disproportional and unreasonable.
- LP3 should provide greater flexibility for development in the countryside and there should not be a blanket ban. NPPF encourage sustainable housing development in rural areas and this could help to retain or promote community facilities.
- Object to development at Kennett due to conflict of interest, traffic situation in and around village already bad particularly with HGVs, unsafe for children and £20 million estimated cost for infrastructure.
- Wicken should be classified as a small village as there is no primary school and population of Upware is included in Wicken parish which should not be. Wicken Fen facilities are included which does not contribute to the village.
- Support for Bottisham as a large village but more housing growth should be allocated to reflect this status.
- Village boundaries unnecessarily restrict development in rural areas and this is contrary to

NPPF. Development in sustainable locations should go ahead without delay.

- Viability of housing development at Littleport and to some extent Soham and Kennett. The capacity of primary school should be addressed. This could affect five year land supply.
- Isleham does not meet the criteria of a large village as it has limited shops and no doctor's surgery.

Policy LP4: Green Belt

Summary of issues raised

- Various detailed suggestions to improve clarity of policy wording, including the purpose of the green belt; the process for returning undeveloped allocations to the green belt;
- Concern that the policy is not in conformity with the NPPF, as not all reasonable alternatives have been considered during the SA/SEA process; SA scoring is incorrect for a number of topics.
- Various comments broadly supporting the policy

Policy LP5: Community-led Development and Self-build

Summary of issues raised

- Various concerns that the title of the section, and wording within the section, is too vague/unclear;
- Various detailed suggestions to improve the accuracy of the section, particularly in relation to Community Land Trusts; the number of dwellings and development on allocated and unallocated sites;
- Various site specific comments, particularly in relation to land at Kennett;
- Various detailed suggestions for: re-wording of a number of policy criteria; inclusion of reference to heritage assets;
- Concerns that the policy is not strict enough in relation to: affordable housing requirements; community support and financial transparency.

Policy LP6: Meeting Local Housing Needs

Summary of issues raised

- Some supports the current wording of Draft Policy LP6.
- Support the broad aim of Policy LP6 which suggests that affordable housing is set at 20% in Soham.
- Should make reference to Key worker housing. Clearer wording required on general & specialist older peoples housing including specified proportions of bungalows.
- Some concerns about the practicalities of delivering self build plots by a self-builder alongside the delivery of the majority of housing within a larger development by a housebuilder. It could be that the self build plots could remain uncompleted for a number of years after the main development have finished and this has health and safety implications for residents.
- Starter homes should be replaced with the term used in the White Paper, namely "affordable home ownership products" (White Paper, page 101).
- It may be more appropriate for the affordable housing requirement to be up to 30% rather than a minimum of 30%.

- It would be more appropriate to encourage self-build homes rather than require 5% of all plots to be self-build when there may not be market demand for self-build homes as part of larger sites.
- The increased life expectancy and the increased time that people spend in poor health or with a limiting chronic illness demonstrate the need for specialist care for elderly people in the District.
- Whilst we support the requirement for a minimum of 30% affordable housing provision onsite, the draft policy wording is too prescriptive and contains no flexibility for assessment of viability.

Policy LP7: Gypsies, Travellers and Travelling Showpeople Sites

Summary of issues raised

- Broad support for the policy, and the inclusion of protection of the natural environment and agricultural land quality.

Policy LP8: Delivering Prosperity and Jobs

Summary of issues raised

- Some support for this policy in particular preserving employment sites for B1, B2 and B8 uses.
- The policy should be strengthened so that before employment land can be redeveloped for other purposes it must have been offered for disposal at a proper value for a reasonable amount of time (e.g. 12 months) and no reasonable offers have been refused.
- Some objection to policy wording as it is too onerous on applicants to demonstrate that employment use is not viable on allocated employment site.
- Policy should be more flexible to allow other uses on employment sites that generate considerable jobs such MOT centres, children's nursery, etc.
- Policy wording regarding Lancaster Way should be amended to allow other ancillary uses to be permitted.
- The Enterprise Zone at Lancaster Way and other strategic employment sites will be major trip generators with potential to have significant impacts on the transport network. Planning applications should be supported by a transport assessment and consider the cumulative impact.
- Existing businesses should be allowed to expand and land should be allocated for this to occur.
- In the section relating to new employment development in the countryside, 'heritage assets' to the third bullet point should be added.

Policy LP9: Equine Development

Summary of issues raised

- Various comments suggesting rewording, including that any new buildings should be close to existing to prevent unwanted development within the countryside
- Comment suggesting that an additional criteria addressing the loss of equine related development;
- Comment seeking specific inclusion of equine tourism development.

Policy LP10: Development Affecting the Horse Racing Industry

Summary of issues raised

- The evidence behind the policy is lacking, in particular reference should be made to a specific report into the value of horse racing to the local area.
- Comments suggesting that greater flexibility should be given to development that may have an adverse impact upon a specific site related to the horseracing industry.

Policy LP11: Tourist Facilities and Visitor Attractions

Summary of issues raised

- Various comments broadly supporting the policy
- Comment seeking specific inclusion of equine tourism development
- Comments suggesting that greater emphasis should be given to the importance of horse racing to the local tourist economy, in particular references should be made to the National Stud and National Heritage Centre in addition to Newmarket Racecourse itself.
- Detailed suggestion to amend the third bullet with the inclusion of 'heritage assets'.
- A site specific comment was also received, relating to Ely.

Policy LP12: Tourist Accommodation (excluding holiday cottages)

Summary of issues raised

- Comments broadly supporting the policy;
- Concern that the policy as written would add burden on developers by being too restrictive, particularly in relation to marketing;
- Detailed suggestions, to improve clarity of policy wording, particularly in relation to heritage assets.

Policy LP13: Holiday Cottage Accommodation

Summary of issues raised

- Comments broadly supporting the policy;
- Concern that the policy is too restrictive in its definitions.

Policy LP14: Location of Retail and Town Centre Uses

Summary of issues raised

- Various suggestions that policy needs additional wording to cover: conservation and design; safeguarding town centre car parking;
- Various suggestions that policy needs rewording in relation to small scale facilities at strategic employment sites, thus enabling complimentary facilities.

Policy LP15: Retail uses in Town Centres

Summary of issues raised

- No comments were received on this policy.

Policy LP16: Infrastructure to Support Growth
Summary of issues raised
<ul style="list-style-type: none"> • Various comments broadly supporting elements of the policy, including specifically the new text added for the Further Draft; • Various suggestions for improved clarity of policy wording in relation to cross boundary impacts; provision of contributions towards green infrastructure; timing of infrastructure contributions and improvements and specific reference to County Council documents; • Various comments relating to the operation of the Community Infrastructure Levy (CIL); the need for contributions to be proportionate; the relationship between CIL and Section 106 contributions; and how contributions will be secured; • Comments that the policy is vague/unclear and should be removed • A number of specific comments in relation to proposed allocations in Isleham;

Policy LP17: Creating a Sustainable, Efficient and Resilient Transport Network
Summary of issues raised
<ul style="list-style-type: none"> • Detailed suggestions to improve the clarity of policy wording in relation to: the impact of development on designated sites; the protection of existing town centre car parks; • Various comments broadly supporting elements of the policy; • Comments suggesting the policy is weak, and should place more emphasis on rail travel; • Various comments relating to a number of specific settlements. Including, the lack of sustainable travel options in Isleham, and the highway impacts of the extension to Lancaster Way. • Various comments relating to matters beyond the remit of the Plan, for example speed limits and their enforcement.

Policy LP18: Improving Cycling Provision
Summary of issues raised
<ul style="list-style-type: none"> • Various comments broadly supporting elements of the policy; • Various comments relating to specific settlements, including Isleham and Stuntney/Stretham connectivity; • Detailed suggestions to improve clarity of policy wording, including deletion of reference to Market Town Transport Strategies; the inclusion of encouragement of walking.

Policy LP19: Maintaining and Improving Community Facilities
Summary of issues raised
<ul style="list-style-type: none"> • Various comments broadly supporting elements of the policy; • Various comments suggesting improvements to clarity of policy, including reflection of the role of community facilities, that new facilities must be multi-use, meeting criteria for re-use of community facilities and the provision of facilities at an early stage of development. • The policy is too vague and lacks detail, particularly in relation to the scale and type of facilities

to be provided.

- Concern that the policy as written would add a further cost burden on developers, which could make the development unviable. Evidence in this regard is weak.
- The requirements of the policy in respect of funding and governance arrangements are too onerous.

Policy LP20: Delivering Green Infrastructure

Summary of issues raised

- Various comments broadly supporting elements of the policy;
- Various detailed suggestions, to improve clarity of policy wording, including strengthening wording relating to ensure certainty of mitigation, the inclusion of the Wicken Fen Vision;
- Concern that the policy as written would add a further cost burden on developers, which could make development unviable;
- Various comments suggesting that mapping of the Green Infrastructure Network, designated sites and ecological networks should be included.

Policy LP21: Open Space, Sport and Recreational Facilities

Summary of issues raised

- Various comments broadly supporting elements of the policy;
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to: mitigating effects on designated sites; the creation of native woodland; that site specific circumstances should determine whether provision is on or off-site; developments under 400 dwellings should make contributions towards sports facilities; an additional requirement should be added to secure adequate ancillary facilities alongside sports facilities.
- Detailed suggestions for amendments to 'Part C' of the policy.

Policy LP22: Achieving Design Excellence

Summary of issues raised

- Various comments broadly supporting the policy;
- Various detailed suggestions, to improve clarity of policy wording;
- Various comments suggesting the policy needs substantial or significant rewording, particularly in relation to the requirement for Health Impact Assessments and the need for masterplans on large scale schemes;
- Comments suggesting that the evidence behind the policy is lacking, in particular in relation to Health Impact Assessments.

Policy LP23: Water Efficiency

Summary of issues raised

- Various comments broadly supporting the policy;
- Concern that the policy is not justified or in conformity with national policy, as the Technical Housing Standards are optional and therefore should not be a mandatory requirement;

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| <ul style="list-style-type: none"> Concern that the policy would add a further cost burden on developers, which could make development unviable. |
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<h3>Policy LP24: Renewable and Low Carbon Energy Development</h3>
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<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Concern that the policy would add a further cost burden on developers, which could make development unviable. Various comments suggesting the policy needs amending, especially in relation to the mitigation of or compensation for harm; the inclusion of a requirement for solar panels; Concern that the policy is not in conformity with the NPPF and Planning Practice Guidance. Comments broadly supporting elements of the policy |
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<h3>Policy LP25: Managing Water Resources and Flood Risk</h3>
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<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Various comments broadly supporting elements of the policy Various comments suggesting the policy needs amending, especially in relation to existing ponds and lakes, the Offshore Marine Plan (2014), and factual errors relating to the Old and New Bedford Rivers |
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<h3>Policy LP26: Pollution and Land Contamination</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Comments broadly supporting elements of the policy; A general comment relating to the need to protect new development from existing sources of pollution, in particular noise. |
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<h3>Policy LP27: Conserving and Enhancing Heritage Assets</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Detailed suggestions, to improve clarity of policy title and wording; Comments broadly supporting elements of the policy Concern that the policy is not in conformity with the NPPF |
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<h3>Policy LP28: Landscape and Townscape Character, including Cathedral Views</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Detailed suggestions to improve clarity of section and policy title; Comments broadly supporting elements of the policy; Comments that the policy is unclear and ambiguous in respect of 'general visual distinctiveness of Ely'; Comments that the policy needs significant rewording in order to be less restrictive in relation to the Cathedral views; |
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| <ul style="list-style-type: none"> The evidence base behind this policy is lacking/weak. |
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- The evidence base behind this policy is lacking/weak.

<h3>Policy LP29: Conserving Local Green Spaces</h3>
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<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Various comments stating the evidence behind the policy is lacking/weak, particularly in relation to the site appraisal process; Various comments relating to specific sites set out in the Local Green Space evidence report; Suggestions of additional sites for consideration |
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<h3>Policy LP30: Conserving and enhancing Biodiversity and Geodiversity</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Various comments broadly supporting the policy; Concern that the policy is not in conformity with the NPPF particularly in relation to SSSIs and protection across the hierarchy of sites; Comments that the policy needs rewording, especially in relation to the protection of ancient woodland, and the requirement for applications to be accompanied by appropriate surveys or impact assessments; inclusion of reference to the requirements of the Habitats Regulations. |
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<h3>Policy LP31: Development in the Countryside</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Various comments broadly supporting the policy; Comments suggesting the policy needs substantial or significant rewording, especially in relation to parts A, C and D, to include provision for equestrian residential estates, flexibility for affordable housing provision, removal of occupancy clauses and size of replacement dwellings; Part B requirement to go to three RSL's is unreasonable; Concern that the policy is not in conformity with the NPPF by setting out an overly restrictive approach to development in the countryside with limited exceptions. |
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<h3>Policy LP32: Infill Development in Locations Outside of Development Envelopes</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> Various comments that the policy is too vague/unclear, including in relation to the application of distance from the development envelope; Various comments suggesting the policy needs rewording, especially in relation to prioritising brownfield land over infill plots, including small villages, the distance from development envelopes and the size of an infill plot; Various comments broadly supporting elements of the policy; Detailed suggestions for rewording of the policy. |
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Section 7 : Policies for Places
Summary of issues raised
<ul style="list-style-type: none"> • Concern in relation to the number of settlements seeking improvements to bus services, with only small scale development proposed; • A specific comment making reference to Historic England's Advice Note 3: Site Allocations in Local Plans, which should be taken into account when assessing sites; • A number of comments in support of sites submitted for allocation in various settlements, including Soham, Fordham, Sutton and Stretham; • Support for the objective in many settlements to improve walking and cycling connectivity. • Various expressions of support for seeking to identify sites for an additional 500 – 1000 dwellings; • Various concerns expressed relating to the deliverability of some sites proposed for allocation; • Suggestion that the housing requirement should be increased to support the local economy and boost supply of housing.
Settlement: Aldreth
Summary of issues raised
<u>Infrastructure and Other constraints</u> <ul style="list-style-type: none"> • Haddenham Parish Council proposes revised wording of Aldreth1: Built development should respect the local character of the village, such as building design, height, window sizes and materials used. • Haddenham Parish Council requests that antiquated wiring to house is replaced to ensure high speed broadband connectivity.
Settlement: Ashley
Summary of issues raised
<u>Overarching Issues/Concerns</u> <ul style="list-style-type: none"> • Ashley does not have a primary school and there is limited public transport service and so categorisation of Ashley as a medium village is questioned. • Support no housing allocation in Ashley.
<u>Infrastructure and Other constraints</u> <ul style="list-style-type: none"> • Support - character and nature of Ashley's historical centre should be preserved and that any new building be sympathetic in style and nature. • The Parish Council's view on those priorities is as follows: <ul style="list-style-type: none"> • Improve road safety in Ashley by reducing speed of traffic through centre of village, Church Street and Mill Road and through highway improvements at junction of Church Street and Newmarket Road. • Provision of modern village hall with improved facilities to allow better use of recreation ground. • Improve capacity or efficiency of main drains to avoid flooding in village and routes into village caused by overcapacity. • More frequent, daily bus service to Newmarket and Bury St Edmunds.

Site Specific Comments

ASH.LGS1 Wavier Pond, Church Street

- Support the allocation of the Wavier Pond and the space around it as a Local Green Space.

Settlement: Barway

Summary of issues raised

Infrastructure and Other constraints

- One comment relating to the need for development to address surface water issues.

Settlement: Black Horse Drove

Summary of issues raised

Infrastructure and Other constraints

- Surface water receiving system is at capacity. Necessary surface water accommodation should be provided in advance of development.

New Site(s) suggested

- Site/18/24 Land at Black Horse Drove

Settlement: Bottisham

Summary of issues raised

Overarching Issues/Concerns

- In education terms, the scale of development proposed in Policy Bottisham 3 can be mitigated.
- The need for housing and affordable housing will not be met until additional land is released from the Green Belt.
- Any future development on Land around Bell Road should include a provision of children's play area.

Infrastructure and Other constraints

- Upgrade of sewage treatment facilities is essential.
- Both primary schools and the village college are being extended. Traffic calming measures implemented and are effective.
- Request for noise reduction from A14 and bus service no longer adequate.

Site Specific Comments

BOT.E1 Extension to Tunbridge Lane Business Park

- Site lie entirely within the Safeguarding Area for the Bottisham Waste Water Treatment Works (Policy W7D) designated by the adopted plan.
- Should be de-allocated and land returned to Green Belt if no longer required for employment uses.
- Surface water receiving system has no residual capacity to accept increased rates of surface water run-off. The proposed development would require the necessary surface water accommodation in place prior to development.
- BOT.E1 is supported.

BOT.H1 Land east of Bell Road

- Support for BOT.H1 Masterplan completed.
- The site is located in close proximity to Bottisham Conservation Area and a scheduled monument (a moated site south of Bendyshe Farm). The development should be of high quality design and protect and were possible enhance the conservation area.

BOT.H2 Crystal Park, Tunbridge Lane

- Site nearly completed.

BOT.LGS1 Ancient Meadows

- Considerable support for the designation of BOT.LGS1 as local green space.
- Site lie entirely within the Safeguarding Area for the Bottisham Waste Water Treatment Works (Policy W7D) designated by the adopted plan.

Site/02/01 Land off High Street (rejected site)

- Reconsider site 02/01 - land off High Street – 87 to 96 dwellings and review Green Belt boundary.

New Site(s) suggested

- Two Local Green Spaces are proposed at School playing fields and at The Meadow

Settlement: Brinkley

Summary of issues raised

Overarching Issues/Concerns

- Object to the wording of Policy LP3 as it appears to conflict with the development strategy for the district, outlined in Policy LP2.
- CIL should pay for the infrastructure and so there is no need for paragraph 7.6.3.
- Brinkley can accommodate some growth as there are facilities nearby that could be accessed by future residents.

New Site(s) suggested

- Site/03/01 Land south of High Street
- Site/03/02 Land off Carlton Road

Settlement: Burrough Green & Burrough End

Summary of issues raised

Overarching Issues/Concerns

- CIL should contribute to infrastructure that is fairly and reasonably related to the development proposed in accordance with CIL Regulation 122.
- Policy Burrough Green 2 fails to comply with National Policy and as such ought to be removed to make the plan sound.
- Paragraph 7.7.3 is therefore not compliant with national policy and therefore should be removed in order to make the plan sound.

Infrastructure and Other constraints

- There is spare capacity in the primary school to allow for a small increase in catchment numbers arising from Policy Burrough 3.

New Site(s) suggested

- Site/04/02 Land off B1052

Settlement: Burwell

Summary of issues raised

Overarching Issues/Concerns

- The Devils Dyke as an Anglo-Saxon earthwork and proposals should be scrutinised to ensure no adverse effect on this ancient monument.
- Policy Burwell4 be amended to include - Provide a detailed ecological assessment to include consideration of the effects of increased recreational pressure on Devils Dyke SSSI, SAC, sufficient to enable the LPA to undertake HRA.
- Policy Burwell4 - bullet 2 amended as follows: Provide a minimum of 2.2 hectares of public high quality informal open space on-site, incorporating a range of semi-natural habitats to benefit wildlife.
- Burwell should be considered as a main settlement rather than a large village due to large range of facilities and services located in the village.

Infrastructure and Other constraints

- Para 7.8.1 - Library could be included in the facilities.
- Need to address road and traffic issues throughout Burwell resulting from the increase in housing.
- Policy Burwell2 to include the expansion and improvement of library services.
- The primary school has been expanded by 1FE and has capacity and Bottisham VC is currently being expanded by 3FE.
- Supports for the proposal to designate Pauline's Swamp as a Local Green Space.

Site Specific Comments

BUR.E1 Land at Reach Road

- BUR.E1 - there are two scheduled monuments (Devils Ditch and a Roman Villa) and Burwell Castle. Burwell Conservation Area to the north east. Development of this site has the potential to impact upon the setting these historic asset.
- The proposals will require the necessary surface water accommodation in place to reduce flood risk.

BUR.H1 Land off Newmarket Rd

- Support for BUR.H1 - from 350 homes to 420 homes and significantly larger 5ha Sports Hub.
- BUR.H1 and Policy Burwell 4 - Although no designated heritage assets within the site, a grade II listed Mill to the west of the site. Any development will need to protect and enhance the listed buildings and its settings and should be of high quality design.

BUR.M1 Former DS Site

- The proposals will require the necessary surface water accommodation in place to reduce flood risk.

BUR.LGS1 Pauline's Swamp

- The proposals will require the necessary surface water accommodation in place to reduce flood risk.

Site/05/01 Low Road (Rejected site)

- The site is suitable for residential development and is immediately available for development unlike the viability and deliverability of sites in the north of the District.

Site/05/02 Land North East of Factory Road (Rejected site)

- Reconsider site 05/02 as location for housing due to lack of 5 year land supply.

Site/05/05 Land at Ness Road

- Site should be reconsidered as it is in sustainable location and well linked to the village.

DE/05/03 Land at 131 & 131B North St (Rejected suggested change to Development Envelope)

- Reconsider boundary of the development envelope at rear of 131B North Street as the reasons given for not changing is considered as unsound.

New Site(s) suggested

- Site/05/07 Land at 56 Low Road
- Site/05/08 Newstead Farm, Swaffham Road
- Site/05/09 Land off Newmarket Road

Settlement: Chettisham

Summary of issues raised

Overarching Issues/Concerns

- Whilst there are no housing allocations proposed for Chettisham, the plan is misleading as the North Ely site (ELY.M1) is located immediately adjacent to the development envelope. For transparency, the plan should make reference to this.

Infrastructure and Other constraints

- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development.

Settlement: Cheveley

Summary of issues raised

Site Specific Comments

- Amend para 7.10.4 - The land identified is already being developed and is almost complete.

CHV.H1 Land between 199 and 209 High St

- CHV.H1 - The site is south of Cheveley Conservation Area and is near to a number of grade II listed buildings. Development of this site will need to conserve and enhance the

- conservation area and listed buildings and their settings.
- Please note minor typographical error in title of Policy Cheveley 3.

New Site(s) suggested

- Site/06/03 Land to the rear of 15-25 High Street
- Site/06/04 Land at Brook Stud

Settlement: Chippenham

Summary of issues raised

Overarching Issues/Concerns

- Any future development proposals should be carefully scrutinised to ensure that there is no adverse impact on Chippenham Fen SSSI, part of Fenland SAC.
- Chippenham Park as a Registered Park and Garden, this is a designated heritage asset and should be referred to as such in para 7.11.1 and reference in Policy Chippenham 1.
- CIL should pay for the facilities in the village as such a direct contribution would not be CIL 122 compliant.
- Amendment to Policy Chippenham 1 wording suggested.
- Policy Chippenham 2 fails to comply with National Policy and as such ought to be deleted.

Site Specific Comments

Site/07/02 Land off Scotland End (rejected site)

- Site should be for reconsidered for allocation for housing.

Settlement: Coveney

Summary of issues raised

Infrastructure and Other constraints

- Policy Coveney2 should include the following infrastructure requirements: extension of 30mph speed limit and, improvements to schools, roads, transport and health services throughout the district.

DE/08/01 Land at Gravel End (Rejected suggested change to Development Envelope)

- Development Envelope should be amended to include land at Gravel End, as site offers a suitable infill plot.

DE/08/02 Land west of Mansion Farm Yard (Rejected suggested change to Development Envelope)

- Development Envelope should be amended to include land at Mansion Farm Yard. Site was granted planning permission in Nov 16 for seven dwellings, and should therefore be amended to reflect this planning decision.

New Site(s) suggested

- An additional change to development envelope submission was received for land at Gravel End.

Settlement: Dullingham
Summary of issues raised
<u>Overarching Issues/Concerns</u>
<ul style="list-style-type: none"> • Dullingham should be classified as a small village as population of village is smaller than parish population which is used to categorise the village in the settlement hierarchy. • Parish council suggested rewording of paragraph 7:13:1. • No reason for any changes to the current development envelope. • Dullingham 2 – remove reference to speed reduction as this has been achieved. • Dullingham House is a Registered Park and Garden and should be referred to as such in para 7.13.1. • No new development means no affordable housing for local people and infill policy will not deliver affordable housing. • Any development should be on previously developed land. • Object to site 09/01 as it will increase traffic in village and this will have impact on quality of life and on equine businesses.
<u>Site Specific Comments</u>
Site/09/01 Land south of Stetchworth Rd (rejected site)
<ul style="list-style-type: none"> • Land to the south of Stetchworth Road should be reconsidered as can provide affordable housing, open space and community uses, and fund other much needed local infrastructure. Suitable location and can be delivered in short time.
Site/09/02 Former Highways Depot (rejected site)
<ul style="list-style-type: none"> • Former highway depot, Brinkley Road should be reconsidered even though it may be a little detached from the main village envelope.
<u>New Site(s) suggested</u>
<ul style="list-style-type: none"> • Site/09/03 Land at Kettlefields • Site/09/04 Land west of Station Road

Settlement: Ely
Summary of issues raised
<u>Overarching Issues/Concerns</u>
<ul style="list-style-type: none"> • Whilst the Station Gateway (ELY.M4) is identified as a draft site allocation, there are other sites in proximity of the station that provide opportunities for sustainable development. • Chettisham will be ‘swallowed up’ by development at Ely. Better to ‘swallow’ Witchford, as less through traffic. • Draft site allocations are either very small or very large – more moderate sites should be included to provide a range of different development opportunities.
<u>Infrastructure and Other constraints</u>
<ul style="list-style-type: none"> • Housing development will place increased pressure on the existing green infrastructure network, including potential impacts on designated sites. Housing development policies should require proposals to deliver additional and/or enhanced GI to meet additional demand. • Reduce bypass speed limit.

- Build new housing further away from bypass to reduce noise and air pollution, improve safety and quality of life.
- Plan does not mention expansion of sewerage infrastructure.
- Council must ensure policies ELY1 and ELY2 are compliant with national policy tests for planning obligations and CIL regulations, and does not overburden development to the extent that viability is threatened.
- Cambs County Council confirm that mitigation of education impacts has already been identified in the form of two new primary schools (inc. Isle of Ely Primary which has already opened) and new secondary school in Littleport (open September 2017).

Site Specific Comments

ELY.M1 North Ely

- Support for scheme to be delivered in accordance with planning consent and/or principles of Ely North SPD.
- Site is located within a WWTW Safeguarding Area for allocation of a new Ely Waste Water Treatment Works.
- Development should protect and enhance the listed building (St Michaels Church) and its setting.
- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development.
- Site promoter confirms commitment to delivery of site, with planning permission granted for 2,000 dwellings (of 3,000) total.
- Landowner confirms commitment to bring forward land as mixed-use scheme.

ELY.M2 The Grange

- Development should conserve, and where opportunities arise, enhance the setting of Ely Conservation Area and listed buildings.
- Located in Conservation Area, development should be of particularly high quality and respond to local character and distinctiveness.

ELY.M4 Station Gateway

- Proposals should have no adverse impacts on the adjacent CWS and ideally enhance and provide public access.
- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development.
- Development should pay particular regard to adjacent County Wildlife Site and ensure no adverse impact upon it. Public access must be compatible with enhancement of ecological interest of site.
- Station Gateway policy to restrictive in respect of retail – needs greater flexibility.
- Development should conserve, and where opportunities arise, enhance the Conservation Area. Located in Conservation Area, development should be high quality and respond to character and distinctiveness.

ELY.M5 Octagon Business Park

- Site is located within a WWTW Safeguarding Area for allocation of a new Ely Waste Water Treatment Works.
- Development would have a negative impact on the setting of Ely Cathedral and the economic well-being of the city centre.
- Legal agreement in place with drainage board to manage surface water.

ELY.E1 Ely Road and Rail Distribution Centre

- Proposals should have no adverse impact on the adjacent SSSI, CWS and Ely Country Park by providing adequate landscape treatment and other mitigation.
- Development proposals should contribute significant ecological enhancements.
- In addition to avoiding impacts on SSSI, CWS and Ely Country Park, major development should enhance these sites and the wider ecological network along the Ely Ouse.
- Site is located within a WWTW Safeguarding Area for allocation of a new Ely Waste Water Treatment Works.

ELY.E2 Lancaster Way Business Park

- Site lies within a Waste Consultation Area. Typically B2, B8 employment uses are unlikely to prejudice waste management operations, but B1 may be sensitive.
- Development will retain and expand employment opportunities local to Ely and reduce the level of out-commuting.
- Site boundary should remain clear of bridleway (located west of site, which is well used and offers views of Ely Cathedral), should follow topography, and provide suitably landscaping. Site area should be reduced in size and redrawn towards Ely.
- Extension of Lancaster Way Business Park is not commensurate with its rural location.
- Site is excessive in its extent and would conflict with aspirations of the plan to protect open countryside, landscape and Cathedral views. This will have significant adverse impact on the rural setting of Witchford.
- Development of site would have severe transport implications for residents of Witchford. Direct vehicular access to A10 should be provided.
- To provide greater clarity, the draft site allocation should be split into smaller parcels reflecting the extent of the existing business park, area of Enterprise Zone, and proposed extension to south.
- Site promoter confirms deliverability of extension area.
- Site promoter welcomes draft site allocation, and confirms designation of area as National Enterprise Zone, with infrastructure progressing to serve extension land.

ELY.L1 Downham Road Sports and Leisure Hub

- Development would have a negative impact on the setting of Ely Cathedral and the economic well-being of the city centre.
- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development.

Site/10/05 Orwell Pit Farm (rejected site)

- Site promoter objects to rejection of site.
- Site assessment flawed as site will provide on-site infrastructure and facilities.
- Site can be readily assimilated into the landscape and will not have significant impacts on the character and setting of Ely.
- Progress of North Ely site (ELY.M1) indicates positive market conditions in locality – radical approaches required to meet housing shortfall.
- Site has similar characteristics to ELY.M1.
- Precedent for development west of the A10 already set by Sports and Leisure Hub.
- Site has clear boundaries and would be developed in phases, therefore would not harm landscape or setting of Ely.
- Views of Cathedral would be maintained.
- Sustainable location close to Ely's services and facilities; well-related to Ely.
- Site could provide up to 2,000 dwellings, of which 600 affordable, self-build plots, a primary school and 5ha of employment land.

Site/10/10 Greenacre Farm (North) (rejected site)

- Site promoter objects to rejection of site, and to site assessment process and findings - suggests proposal was misunderstood.
- Proposed use sought was recreational/leisure i.e. playing fields/sports facilities, including some commercial facilities – such as gym/spa, garden centre. Private sports clubs.
- Net area calculation not appropriate.
- Assessment assumes access via West End. However it is intended that access would be taken from adjacent Sports and Leisure Hub.
- Recreational uses will have less visual impact than other types of development.
- Site should be reassessed.
- Comprehensive assessment of formal open space is required to ensure needs of growth are met. Site/10/10 should be reassessed in light of this assessment.
- Site should be allocated to provide an extension to Sports and Leisure Hub.
- Site would support recreation needs of Ely North development (ELY.M1).

Site/10/14 Land to the south of Ely golf club and to the east of Cambridge Road (rejected site)

- Site promoter objects to rejection of site.
- Site can make a valuable contribution to supply of housing land.
- Site is in a sustainable location as it is in close proximity of Ely's main urban area, with pedestrian/cycle/public transport access to its wide range of services and facilities.
- Disagrees with Site Assessment Evidence Report, which suggests site is physically separate from Ely – as site can be developed in conjunction with Site/10/15.
- Separation is as a result of Ely golf club; however this is not open countryside and is urbanised in form.
- Site has clear, defensible boundary. Proposed highways works along A142 and A10 will strengthen the boundary of the site.
- Minimal impact on distant views of Ely Cathedral, due to topography and vegetation.
- Noise from A10 can be easily mitigated through design and layout.
- Development would be a logical extension to Ely.

Site/10/15 Land to the south of Witchford Road (rejected site)

- Site promoter objects to rejection of site.
- Site can make a valuable contribution to supply of housing land, and is suitable, available and deliverable.
- Site is in a sustainable location as it is in close proximity of Ely's main urban area, with pedestrian/cycle/public transport access to its wide range of services and facilities.
- Strongly disagree with findings that site will have significant adverse impact of historic City of Ely – site is over 500m from Conservation Area, 0.8km from nearest listed building, with views restricted by topography and built form.
- Opportunities to establish a strong accessible green fringe to the City.
- Any landscape impacts can be addressed through design and mitigation measures.

Site/10/16 Westmill Foods Site, Angel Drove (site rejected in part)

- Site promoter objects to rejection of wider site area as a mixed-use proposal. NB: eastern part of site, with frontage to Angel Drove, forms part of draft site allocation ELY.M4.
- Despite marketing, site has been vacant and underutilised for more than 12 years.
- Allocation should attract and secure potential developers/occupiers at the earliest opportunity.
- No reasonable prospect of site being developed for employment purposes.
- Site suitable for housing development and retail and commercial – particularly large-scale retail, which is unlikely to be met in the town centre.

- Site offers sustainable location for housing development, near rail station and town centre.
- Rear site well-related to built area.

New Site(s) suggested

- Site/10/27 Land at Kiln Lane
- Site/10/28 Princess of Wales Hospital site
- Site/10/29 Site to the north-east of Witchford

Settlement: Fordham

Summary of issues raised

Overarching Issues/Concerns

- The 200 houses proposed should not be exceeded.
- More sites need allocating to meet 5 year land supply.

Infrastructure and Other constraints

- Additional development will put further pressure on schools, doctor's dentists, youth clubs, social clubs etc
- Most people will commute – increasing car travel and congestion on and towards the A14
- Fordham2 – some of these items are 'strategic' and should be CIL funded, not site specific developer funded.
- Fordham 2 – needs 2 more bullets: provision of natural green space; management measures to avoid impact on SSSI
- Fordham Primary School can accommodate the 200 houses planned. However, school not be expanded further, to accommodate further growth.
- Deficit in early year's education provision.

Site Specific Comments

FRD.H1 Land south of Mildenhall Rd, east of Collins Hill

- No objection, but if mineral is extracted, it should be put to sustainable use.
- Object to this site, due to impact on Grade I listed St Peter's Church, opposite the site. If site continues, policy must have wording about high quality design and the need to conserve / enhance setting of the conservation area and listed church.
- (Promoter) support allocation. However, access should also be permitted off Collin's Hill. Also, if new suggested site adjoining to south is supported, alternative access to FRD.H1 might be appropriate.

FRD.H2 Land north-east of Rules Garden

- (Promoter) allocation supported
- Policy and supporting text should refer to need to conserve / enhance nearby listed building (Cromwell House)

FRD.M1 Scotsdale Garden Centre

- Proposed allocations have the potential to have an adverse effect on European protected sites and SSSI, through increased recreational pressure. Policy for both sites needs a requirement for HRA and a requirement for a net gain in biodiversity.
- FRD.M1 – (promoter) support allocation. However,
 - 150 target should be indicative, not maximum.
 - Policy should confirm that the garden centre will remain on site (albeit consolidated to approx 4 hectares), with rest (approx 9ha) for housing-led development.

- Policy too specific / restrictive in terms of access – this detail should be determined at masterplaning and planning application stage.
- Employment provision should be flexible (not B class)
- Other detailed policy wording amendments also suggested

FRD.M2 Land north of Mildenhall Rd

- Object: traffic / access make this site unsuitable.
- Proposed allocations have the potential to have an adverse effect on European protected sites and SSSI, through increased recreational pressure.
- No objection, but if mineral is extracted, it should be put to sustainable use.

FRD.E1 Employment Cluster south of Fordham

- Support need for HRA
- No objection, but if mineral is extracted, it should be put to sustainable use.
- The Transport Safeguarding Area and the Waste Consultation Area for the European Metal Recycling Railhead, Snailwell, designated by T2D of the M&W Local Plan is not identified / wrong respectively on the Policies Map – it should be added / corrected respectively. Policy Fordham6 should also refer to these designations.
- FRD.E1(A-G) – these should all be for B1, B2 and B8.
- FRD.E1 (D) - Object to the need for a concept plan
- Support reference to heritage and archaeology in the policy, but specific mention should be made of the scheduled ancient monument and listed buildings which are very nearby.

Site/11/01 Land south of Fordham Rd (rejected site)

- Site 11/01 – (promoter) site should be reassessed – recent permissions nearby demonstrate this site also suitable for up to 60 dwellings.

Site/11/02 Land at 5 Station Rd (rejected site)

- Site 11/02 – (promoter) site should be added, because it now has a resolution to grant planning permission (subject to s106) for 27 dwellings.

Site/11/03 Land off Soham Rd

- Site should be reassessed (detailed reasons given), for 45-60 dwellings

Site/11/13 Land fronting Soham Rd and Stewards Field

- (Promoter) this rejected site could be reduced to 0.5ha, accessed off Stewards Field, and allocated for 20 dwellings.
- (Promoter) site should be reassessed – especially error relating to access (which can be provided off Grove Park, contrary to evidence reports published by council).

New Site(s) suggested

- Site/11/25 Land to the east of Isleham Rd
- Site/11/26 Allotment Gardens, Collins Hill

<p style="text-align: center;">Settlement: Haddenham</p> <p style="text-align: center;">Summary of issues raised</p>
<p><u>Overarching Issues/Concerns</u></p> <ul style="list-style-type: none"> • Haddenham Parish Council is content with the draft allocations, as these are in line with comments made following the Call for Sites exercise. Strongly supports proposal for Community Led Development scheme – see Site/12/16.
<p><u>Infrastructure and Other constraints</u></p> <ul style="list-style-type: none"> • Haddenham Parish Council requests revision to policy Haddenham2, including: highway improvements and calming to reduce traffic speeds in the village; installation of traffic lights at Haddenham Top Corner; safety improvements at Witcham Toll junction; improvements to pedestrian/cycle routes, including installation of pedestrian crossing near Haddenham crossroads and provision of a new Northstowe – Aldreth – Haddenham – Stretham – Ely cycle route, and Haddenham to Witcham Toll cycle route; improved public transport links; improvements to community facilities, including the Arkenstall Centre, Sports Pavilion and other recreation facilities; expansion of primary school. • Village is served by fibre Broadband; however, cabling between homes and cabinet is antiquated and requires upgrading. • Cambridgeshire County Council confirms that the level of growth proposed by the plan can be mitigated at the local primary school which has potential for expansion. There is emerging pressure at secondary school, but site has potential for expansion.
<p><u>Site Specific Comments</u></p> <p>HAD.H2 Land at New Road</p> <ul style="list-style-type: none"> • Site adjoins the Conservation Area. Development of the site will need to conserve and where opportunities arise enhance the conservation area and its setting – this requirement should be included in the policy, and should reflect the statutory requirements. • Site promoter requests boundary is amended to include further land to the east, to enable the development of 180 dwellings – see Site/12/17. <p>HAD.H3 Land east of Chewells Lane</p> <ul style="list-style-type: none"> • Site promoter supports allocation of site, but requests that policy wording is amended to make it clear that the proposed dwelling figure (40 units) is indicative only. • Site will deliver public benefits, including new public open spaces, play areas and improved access to public rights of way. • Site is unconstrained and can be delivered within five years. <p>Site/12/05 Metcalfe Way (rejected site)</p> <ul style="list-style-type: none"> • The site promoter disagrees with the findings of the site assessment and objects to the rejection of the site. • The site is located approximately 340 metres from a Water Recycling Centre. An odour assessment will be undertaken to ensure no detrimental impact on the quality of life of future residents. • Proposed layout of the site can easily accommodate sloping topography, and respect adjoining development, through appropriate mix of dwelling sizes and sensitive placing and orientation. • A significant landscape buffer will be installed to protect neighbouring amenity. • Site promoter argues that the site is just as suitable as the draft site allocations, when considered against the assessment criteria. • Proximity to heritage assets should not be treated as a negative factor.

- Site will bring forward sustainable development, without harm to the character and facilities, and will bring investment in infrastructure.

Site/12/09 Anson packaging Site (rejected site)

- Site promoter disagrees with the findings of the site assessment, and the rejection of the site.
- The site is located within the development envelope and therefore is not physically separate from the main area of the village.
- The site is approximately 300 metres from village centre, and therefore is within walking distance of village services and amenities.
- The premises are vacant and do not therefore currently offer employment – land to the north of the site is allocated for employment use currently, therefore employment land is available in the area.
- The site generates HGV movements; therefore residential use would reduce highways impact.

Site/12/10 Land off Bury Lane (rejected site)

- Site promoter disagrees with rejection of site, and requests its reconsideration. Site promoter indicates site has excellent access to a range of village services and facilities.
- Site has limited landscape and visual merit.
- Opportunity to incorporate amenity space and landscaping.
- Unconstrained and could provide much needed housing in short term.

New Site(s) suggested

- Site/12/15 Land at Aldreth Road
- Site/12/16 Land off West End
- Site/12/17 Land north of Haddenham Road

Settlement: Isleham

Summary of issues raised

Overarching Issues/Concerns

- Village needs starter homes / homes for young people
- Affordable housing is needed.
- Large homes are not needed
- Isleham should stay as a village - Isleham is not a 'Large Village'
- Lack of services and facilities
- Over-development which will seriously change character of the village.
- New school is needed
- Stop building on farmland – needed for food.
- Growth welcome – will boost infrastructure and services
- Isleham 1 policy, para 2, needs to rule out tall buildings; and require materials which are typical of the village
- Very little employment in Isleham, therefore not suitable for housing growth.
- Small sites ok for development...but not large sites like ISL.H4
- Anticipated effects of US Base at Mildenhall have not been considered – this will free up lots of housing in Isleham.
- Some plots for self-build, for local residents, should be created

Infrastructure and Other constraints

- Only one shop – and this has insufficient parking
- School at capacity / not big enough already / cannot be expanded. Isleham 2 should refer to education (including more early years provision)
- Could the early years provision be moved off school site, to free up land for primary school expansion.
- Doctors are too busy / not local (Soham).
- Roads to/from/in Isleham not suitable / not safe / need slowing down.
- Bridge over former railway is not safe.
- No public transport – everyone will have to travel by car. Isleham 2 should refer to the need for improvements.
- Impact on Fordham and Soham roads/junctions, which are already a problem.
- Scale of development could put pressure on existing green infrastructure, including Chippenham Fen NNR (part of Fenland SAC) and Soham Wet Horse Fen SSSI.
- The Priory should be celebrated and improved.
- Sewerage infrastructure needs resolving
- Internet access very slow
- Frequent power cuts / low gas pressure
- Expansion of recreation ground needed
- Need a gym / swim
- Insufficient facilities for young people / teenagers.
- Local Nature Reserve needs management, funds contributed by developers.

Site Specific Comments

ISL.H1 Land south and west of Lady Frances Court

- Policy should refer to conservation area and its setting

ISL.H3 Land west of Hall Barn Rd

- Policy should require single storey only.
- Policy should refer to Listed Buildings to north-east of site

ISL.H4 Land off Fordham Rd

- Large volume of representations objecting to the site (summary of main issues below). Parish Council 'strongly object'.
- Policy should refer to conservation area and its setting
- Policy needs additional wording requiring a detailed ecological assessment sufficient to enable the LPA to undertake an HRA to mitigate against effects of increased recreational pressure
- Policy needs wording to require a net increase in biodiversity.
- Lack of accessible green space in Isleham, which is likely impacting on recreational pressure on Local Nature Reserve 1km away, which is being degraded by visitors / dog fouling.
- Won't help deliver objectives in Isleham2
- Not suitable because: insufficient space for 150 dwellings; access not appropriate; impact on neighbours.
- Should be safeguarded for a new school, not new houses – as was previously planned
- 2 storey limit, plus bungalows only, especially near Hall Barn Rd and West Street
- Loss of wildlife (owls / foxes / deer / bats / etc)
- 'Significantly exceeded' is too vague – should be a hard cap.
- If built, needs landscape buffer around entire site
- Site supported (landowner): various details in support given.
- (Landowner) Policy should be amended in various ways. Summary headlines: Happy to gift land to PC, but only 'up to 1ha' not 1-1.5ha; remove reference to a roundabout –

better/safer solution being discussed with highways authority; endorses reference to need for bungalows and landscape buffers; reference to clusters of 25 dwellings on site is overly restrictive – should simply refer to a ‘series of character areas’; number of dwellings should be increased to 180 (not 150).

Site/13/05 Land fronting Hall Barn Rd (rejected site)

- Reason for rejection inconsistent with reason for selecting ISL.H3.

Site/13/06 Land north of 55 Sun St (rejected site)

Site should have been included – small site, will provide some affordable homes, access is acceptable. Site suitable for 25 dwellings (revised down from 36 previously assessed), with open space at rear.

New Site(s) suggested

- Site/13/12 Land at Floral Farm
- Site/13/13 Land to the east of Wayside Farm
- Site/13/14 Land at Sun Street
- Site/13/15 Land at Station Rd
- Site/13/16 Land off Beck Rd
- Site/13/17 Land to the rear of 20 Waterside

Settlement: Kennett

Summary of issues raised

Overarching Issues/Concerns

- Kennet is a small village (population 340) – scale of development proposed is a massive over development
- Newmarket should take growth, not Kennett / Kentford
- Concern with scale of growth which surpasses that of all large villages, especially on education provision and sustainable transport implications.
- Lack of cross-border working.
- Number of dwellings at Kennett needs to be more proportionate

Infrastructure and Other constraints

- Object to increased traffic / HGVs / accidents (2 recent fatalities).
- Railway Bridge has 20T limit (not properly enforced).
- Currently 4,500 cars per day, each way, through the village – 500 homes will increase this by 1,000 (25-30%).
- A14/A11 Link Road needs building first.
- A14-A11 Link Road should be removed from Kennett2 – not needed / deliverable (KEN.E1 promoters)
- Problem at The Bell crossroads will get worse
- Object to increased air / light / noise pollution
- Education provision (including cross border provision) needs resolving with any development. 1 FE entry primary school required for 500 dwellings, plus possible expansion of Soham VC secondary school.
- Pavilion on sports field currently being extended, as a joint provision with Kentford. Kennett2 needs updating: ‘provision’ needs replacing with ‘improvements to the’.
- Kennett is not on the mains sewerage system
- Kennett has no gas – only (more polluting) oil

- Lack of any meaningful retail shops in Kennett
- Impact on operation of Studs in locality – especially due to increased traffic.
- Impact on horse-racing industry, due to more cars (from Kennett to Newmarket)

Site Specific Comments

KEN.M1 Land to the west of Station Road

All the following relate to Site KEN.M1 (*Note: there was a very high volume of objections to this site, covering a wide range of issues. The following attempts to capture frequent or particularly pertinent points:*)

- Objections (or very strongly expressed reservations) from the following councils: Cambridgeshire County; West Suffolk; Kennett Parish; Kentford Parish; Moulton Parish; Newmarket Town.
- Allocation not suitable regarding its anticipated impacts on the wider area singularly or cumulatively with the emerging Forest Heath Local Plan. Joint working with Suffolk Heath Council should have been done, under the Duty to Cooperate.
- Petition (signed approx 200) against the proposal received.
- Site within 2km of Breckland Farmland SSSI, a component of Breckland SPA. Development therefore poses a potential risk to Stone Curlews. Evidence needed in SA and HRA to demonstrate no adverse effect on Stone Curlews (Natural England)
- Scale of development poses recreational risk pressure on Chippenham Fen NNR (part of Fenland SAC), Breckland SPA, SAC, Breckland SSSI and Red Lodge Heath SSSI. Policy needs requirement for ecological assessment to enable project level HRA. Policy also needs requirement for a GI Strategy (Natural England).
- Net gain in biodiversity needed.
- Object to the lack of protection of the Historic Asset of a scheduled monument (Howe Hill Bowl Barrow). Site allocation should be reduced to remove the monument from the allocation and/or large buffer zone.
- Site must deliver all infrastructure, including doctor's surgery – Newmarket must not be relied upon.
- If there is a lack of evidence regarding deliverability (see 7.18.4), the allocation is questioned. Not enough evidence to suggest the site is the most suitable and sustainable option
- Allocation contrary to CLT Policy LP5. The proposal is not a CLT development.
- Kennett CLT: withdraws support for the proposal until four issues are negotiated: (a) number of homes; (b) relief road / downgrading of B1085; (c) future development of south / west parts of allocation beyond 2036; (d) infrastructure.
- Loss of biodiversity (deer, hares, birds)
- Will not contribute to five year land supply – smaller sites at Kennett would.
- Site falls within Mineral Safeguarding and Consultation Areas, and Waste Consultation Area – we support these references in the policy.
- Site has no defensible western boundary.
- Site not viable
- Loss of agricultural land
- South-east part of site is within a Groundwater Protection Zone
- Profound impact on landscape, and on settlement pattern in the area.
- Air quality assessment should be required
- Significant concern that the beneficiaries of this site are ECDC corporate objectives and finances. Potential Conflict of Interest.
- Devolution Deal, upon which this proposal rests, has no status in the plan led system. It has not been subject to necessary rigours of consultation.
- Development should be carefully limited (with particular concern for traffic)
- Support the policy where it aims to preserve and enhance the special qualities of the village
- Support the policy for 500, we need new housing - and welcomed the planning weekend.

- Comments from promoter (brief summary):
 - Other than A14/A11 Link Rd (which should be deleted), the scheme will assist delivery of Kennett2 items
 - Site area should be reduced to about 40ha (map provided)
 - Masterplan, not concept plan, should be prepared. Draft masterplan has been prepared.
 - 500 dwellings is acceptable
 - Employment provision should be subject to demand / viability. B2 and B8 reference should be removed.
 - Requirement for joint pre-school and primary school too inflexible – might be better split.
 - Level of local centre provision should be subject to demand / viability.
 - Reference to high proportion of Community led development is unnecessary, too vague and should be deleted in favour of a cross reference to LP5.
 - Transport assessment work underway.
 - Trial pits indicate gravel deposits not high enough % to make it a viable mineral for extracting.

Comments relating to other (non-preferred) sites:

- Other sites have been deleted for political reasons, not technical reasons
- Reasonable alternative sites have not been considered appropriately, as they should have been under SA legislation.
- Reasonable alternatives to less growth at Kennett have not been considered appropriately, as they should have been under SA legislation.

New Site(s) suggested

- Site/14/06 Land to the north of Dane Hill Road
- Site/14/07 Land west of Dane Hill Road
- Site/14/08 Land east of Dane Hill Road
- Site/14/09 Land to the west of Station Road
- Site/14/10 Longstones Stud

Settlement: Kirtling and Upend

Summary of issues raised

New Site(s) suggested

- Site/15/01 Land at The Street

Settlement: Little Downham

Summary of issues raised

Infrastructure and Other constraints

- Policy Little Downham1 makes reference to development contributing to the maintenance of community facilities. As development will be subject to CIL, his policy requirement is not compliant with CIL r122. Requirement should be removed.
- Policy Little Downham2 identifies a number of infrastructure priorities. Developer contributions over and above CIL should be fairly and reasonably related to the development and cannot be sought to address an identified shortfall or deficiency in provision. This requirement is not compliant with national policy and should be removed.

- Cambs County Council indicates that it may be necessary to mitigate impact of development with a small scale expansion of primary school.

Site Specific Comments

LTD.H1 Land west of Ely Road

- Concerns raised regarding location of access. Access to Canon Street would cause unacceptable traffic congestion at busy times and be a safety concern for pedestrians.
- Access should be onto Ely Road, preferably via a mini-roundabout.
- Site is adjacent to the conservation area. Development of the site will need to conserve, and where opportunities arise, enhance the conservation area and its setting. This requirement should be included within the policy and supporting text.
- There is a quintessential view of Ely Cathedral to the south of the site. The impact of development on this view should be considered, and the Council should demonstrate that any impacts on the historic environment would be acceptable.
- Surface water receiving system has no residual capacity. Appropriate surface water accommodation should be provided prior to development.
- Site promoter welcomes the proposed allocation. However, suggests indicative dwelling figure should increase from 25 to 35 dwellings, to make efficient use of land.
- Policy requirements are too prescriptive and should be removed.
- It is unnecessary to specify in the policy minimum open space requirement as this will be calculated on no. and size of dwellings proposed.
- Need to minimise visual impact on Ely Road is accounted for by other policies in the plan and will be addressed at the planning application stage.
- Site remains deliverable and available. Expressions of interest received from developers are currently being explored.
- Site area should be increased to include land to the south east – see Site/16/02.

Site/16/02 Land off Ely Road (rejected site)

- Site promoter objects to rejection of site.
- Site promoter supports LTD.H1, and suggests draft allocation is extended to include Site/16/02.
- Development of site would increase the supply of housing, and improve the visual character and amenity of the area through removal of existing agricultural buildings and associated heavy vehicle movements.
- Site is currently in agricultural use; therefore development of site would not result in the loss of employment.
- Site could provide vehicular access to Ely Road.
- Site supported by Parish Council.

New Site(s) suggested

- Suggested development envelope change at Tower Mill

Settlement: Lt Thetford

Summary of issues raised

Infrastructure and Other constraints

- Parish Council fully supports policies Little Thetford1 and Little Thetford2.
- Development envelope should be amended to include the former scaffolding site at Holt Fen which has recently been granted planning permission for four dwellings

(15/01476/OUT).

Site Specific Comments

LTT.H1 Land north of The Wyches

- The draft site allocation is incorrect – it includes an area of land which is not available for development. Part of the site, on the western boundary, is owned by Little Thetford Parish Council and is intended to provide an extension to the cemetery. The available area is therefore smaller than indicated by the draft site allocation, and dwelling capacity likely to be lower.
- Site may have capacity for more than 15 dwellings – to be determined through a masterplanning exercise.
- No residual capacity for surface water. Necessary surface water accommodation should be put in place prior to development of site.
- Landowner supports allocation. Indicates site is largely free of constraints and has capacity for more than 15 units.

LTT.H2 Land south of caravan park, Two Acres

- Impact of development on the A10 junction remains a considerable concern.
- No residual capacity for surface water. Necessary surface water accommodation should be put in place prior to development of site.

Site/17/03 Land south of Popes Lane (rejected site)

- Site promoter objects to rejection of the site.
- Lt Thetford is a Medium Village with a range of facilities and services and good connectivity with Ely and Cambridge – sustainable location - level of growth should therefore be higher / more allocations should be made.
- Site could accommodate 20 – 30 dwellings, public open space, and a building for community use / local retail.
- Site available now and in single ownership.
- Site adjoins residential development and is adjoined by public byway open to all traffic.
- Concerns raised during site assessment – lack of defensible boundary, adverse visual impact, can be addressed.
- Landowner has access rights from Palisade Court – suitable access can be achieved.

New Site Suggestions

- Site/17/05 Land east of Caravan Park
- Suggested Development Envelope change at Holt Fen Rd

Settlement: Littleport

Summary of issues raised

Overarching Issues/Concerns

- Strategy of allocating large areas of land at Littleport is questionable as viability of development considered to be relatively low.

Infrastructure and Other constraints

- Recognition of the need to provide high quality green infrastructure as part of major allocations, is supported.

- Policy Littleport1 requires that new development should improve opportunities to access to open space through investment in a network of attractive greenspaces, linking to the wider countryside. This is crucial for Littleport due to current deficit in green infrastructure provision, namely the 2ha Accessible Greenspace Standard.
- Essential that new development delivers Green Infrastructure, in accordance with the objectives of the Cambridgeshire Green Infrastructure Strategy – to provide recreation opportunities for residents, and reduce pressure on sensitive sites.
- Scale of growth proposed will require expansion of library services - through provision of a new library site, located close to town centre.
- Cambs County Council indicates that planned growth in the Local Plan 2015 was reflected in the proposals for the education campus, now under construction.
- To meet additional needs, a new primary school could be provided on-site when required and secondary school expanded from 4FE to 5FE.
- Proposed growth will require further school provision. Will need to investigate whether Secondary School can expand beyond 5FE. If not, alternative mitigation may be necessary.
- Strategic plan needed to resolve shortage in early years places.
- Provide additional roundabout access at A10 to enable development at LIT.E1, LIT.M1 and Saxon Business Park (which is constrained by current access) (see additional site suggestion Site/18/23).
- Consider long distant view of Ely Cathedral from south of Littleport. Council should demonstrate that any historic environment impacts, arising from all/any draft site allocations would be acceptable.
- Drainage Board's water receiving system has no residual capacity, therefore new development proposals should put in place surface water accommodation prior to development phase.

Site Specific Comments

LIT.M1 Land west of Woodfen Road

- Policy Littleport4 should include a requirement for proposals to contribute to the preparation and implementation of an integrated green infrastructure and biodiversity. The strategy should be agreed by relevant parties.
- Suggested that site has access constraints, requiring a revised policy approach.
- Site promoter indicates that the policy fails to recognise the public objection to an unfettered vehicular access onto Woodfen Road – these objections can only be addressed through provision of a new roundabout onto the A10.
- As a consequence of a need for a roundabout and affordable housing, the scheme is not viable.
- To ensure scheme is viable, scale of housing development should be increased from 250 to 420 dwellings; and employment development should be reduced from 7 hectares to 2 hectares with an emphasis on starter and incubator units.
- Supports employment allocation to west of A10 to assist delivery of roundabout.
- Littleport4 policy should include requirement for 5% self-build units (as required by current Local Plan 2015 policy). Self-build units, utilising a temporary access, could provide upfront capital to assist in delivery of essential infrastructure.
- Policy wording should be amended to produce a residential-led mixed-use scheme, akin to policies for sites LIT.M2 and LIT.M3.

LIT.M2 Land west of Highfields

- Outline planning application currently being prepared for residential use with neighbourhood centre, including convenience store.
- Address should be changed from 'The Grange' to 'Grange Lane'.
- Site can provide approximately 660 dwellings (of which 300 already allocated).
- Proposed scheme to provide residential development including assisted living/sheltered accommodation, self-build, bungalows/single storey dwellings and live work/dwelling with annex units, and also public open space, landscaping, community facilities inc. meeting spaces, retail and small business units, etc.
- Request removal of requirement to work jointly with promoter of LIT.M3 – aspiration unlikely to be realised as LIT.M2 already working up planning application.
- Request removal of requirement for employment development, in light of pre-application advice received.

LIT.M3 Land south of Grange Lane

- Policy Littleport6 should include a requirement for proposals to contribute to the preparation and implementation of an integrated green infrastructure and biodiversity. The strategy should be agreed by relevant parties.
- Support for inclusion of Country Park (where incorporated into GI and Biodiversity strategy). However 20-25% of the development site is insufficient for delivery of a multi-functional high quality area of informal open space. Area should be increased to 40%, in line with ANGSt standards.
- Small part of site lies within Waste Consultation Area. Policy Littleport6 / supporting text should make it clear that that development should not prejudice the waste depot – albeit unlikely in this instance.
- Site should provide high quality natural green space, in addition to formal open space.
- Policy Littleport 6 requirement for primary school welcomed by Cambs County Council, as additional provision needed to meet growth needs.
- Site promoter indicates landowners support allocation, who are proactively collaborating. Site promoter requests clarity on a number of matters relating to policy Littleport6, namely: scale and nature of employment development and retail provision; how community facilities and social infrastructure should be provided on site and other land allocations in locality; Highways Authority's views on connectivity and vehicular access; open space requirements and how 20-25% proportion has been defined.

LIT.E1 Land at Wisbech Road

- Site lies partly in Waste Consultation Area. The waste management facility has ceased to operate; however the principle of the use is established and any development proposed should be compatible. Situation should be made clear in policy.
- Site is described as 33ha – implies this amount of land is available, but the site includes a number of existing developed sites and operational businesses. Figure should be revised / explanatory note provided.
- Site name is unhelpful / inaccurate as much of the site is located south of Wisbech Road.
- Site includes one large detached dwelling. Not clear if it is intended to change the use from residential to employment.
- Not clear how extended site will be accessed. Black Bank Road will require improvements to serve HGVs.
- Shape of southern part of site is of limited width – new access roads may make parts of this land undevelopable.

Site/18/11 Eastfield Farm [not a draft site allocation, but identified for further development potential]

- Co-owner of site requests site is included for residential development, with possibility of providing site for further primary school.
- Site would focus development in proximity of town centre.
- Site has multiple access points.

New Site(s) suggested

- Site/18/23 Land west of A10
- Site/18/24 Land at Black Horse Drove
- Site/18/25 Land north of Wisbech Road

Settlement: Lode with Longmeadow

Summary of issues raised

Overarching Issues/Concerns

- Delete reference to the Social Club since it is now a private pub.
- Facilities also include a chapel, allotments, recreation ground, tennis court, play area, community hall and orchard.
- Very supportive of better cycle links to Waterbeach and Quy.
- Support for development in village envelope – no affordable housing or mixed-used development in past 20 years.
- This area is outside the Swaffham Internal Drainage District but in an area that drains into the Board's surface water receiving system. The Board do not support or object to the proposal but require that the necessary surface water accommodation is put in place prior to the development.

Site Specific Comments

LOD.H1 Sunny Ridge Farmyard

- LOD.H1 - site is located within the Lode Conservation Area. There are two grade II listed buildings and any development of this site has the potential to impact upon these heritage assets and their settings
- Support for LOD.H1 allocation.

Site/19/02 Former Lode Station Yard (rejected site)

- Support for site 19/02 should be allocated, previously developed land, could accommodate 41 dwellings including affordable and is available for immediate development.
- Disagree with scoring for site 19/02, accessibility to services is incorrect.

New Site(s) suggested

- Site/19/03 Former Lode Station Yard

Settlement: Mepal

Summary of issues raised

Overarching Issues/Concerns

- New development/dwelling types should be in keeping with character of village.
- Concerns housing would not be affordable for local residents and their children. Housing should be available to people with a link to Mepal, either to get on the property ladder or through social housing.

- Concerns that traffic will increase, and will exacerbate existing problems especially at junctions.
- Mepal Parish Council indicate that residents expressed they are strongly protective of the village feel.
- New development should reflect rural village nature and not create a suburban atmosphere.
- Development of family houses would improve the housing mix.

Infrastructure and Other constraints

- Concerns regarding impact of new development on capacity of water infrastructure and sewerage. Sewerage system insufficient, with flooding of houses at Bridge Road. Sewer capacity should be increased.
- Ample play space in village, therefore new development should not include additional play areas.
- Improve access to the major play space provided at the Recreation Ground and play space at Meadow Way estate.
- Improve junction access to the village from the A142 road – difficult in turning out from Mepal village. Witcham Toll junction also has safety and capacity issues as villagers frequently use this alternative route.
- A142 is busy/congested/dangerous – development will increase this.
- Speeding on Sutton Road. Traffic calming measures required along Sutton Road, such as a roundabout at the junction of Sutton road and Witcham Road and road narrowing feature incorporating a pedestrian crossing on Sutton Road.
- Concerns about safety and capacity of A142 from Mepal to Ely, including each junction, and A10 Ely to Cambridge.
- Concerns about impact of development on local services - Sutton Doctors surgery and Mepal school at capacity, and wider facilities such as Princess of Wales Hospital, Addenbrookes and Hinchingbrooke hospitals. Lack of plans for expansion of existing doctors surgery.
- Houses close to A142 suffer badly from traffic noise.
- Mepal Parish Council proposes the following amendments to policy Mepal2: improvements to the (Diocesan Academy) School and privately run preschool facilities; improvement sand extension to village hall; provision of leisure pedestrian and cycle ways including a route across the Washes to facilitate access to existing routes along the Old Bedford bank and potentially to the intended nature reserve at Block Fen; improved crossing routes over Sutton Rod and from the school and preschool and from and to the new development into the village centre, which would also serve to calm traffic. No current demand for a cricket pitch, but provision of hard surface cricket nets would be advantageous.
- Cambs County Council indicate that there is limited spare capacity at the school and no potential to expand. As proposed levels of development are low, mitigation may be possible on a small scale.
- As development is CIL liable, policy Mepal1's requirement for new development to contribute to maintaining facilities would not be CIL r122 compliant. The first sentence in Mepal1 should be removed.
- Projects identified in Mepal2 should be funded by CIL. Other developer contributions to off-site facilities would not be complaint with national policy tests. Policy Mepal2 should be deleted.
- Contributions over and above CIL are to be fairly and reasonably related to the development and cannot be used to address an identified shortfall or deficiency in provision. Para. 7.24.3 is therefore not compliant with national policy and should be removed.
- Concerns over deliverability of policy Mepal2, due to lack of land allocated.

- Mepal2 inaccurate and out of date lifted out of previous plans. Should not be in local plan in present form.

Site Specific Comments

MEP.H1 Land at Brick Lane

- Site is located within Sutton's parish boundary, but adjoins Mepal village. Parish boundary should be amended to bring site into Mepal parish.
- Support for policy requirement to retain the landscape buffer / wooded margin.
- A resident expressed concern their home may be surrounded by taller buildings.
- Proposals should be sympathetic to existing dwellings.
- Development of site will make Sutton and Mepal considerably closer to becoming one settlement.
- Vehicular access from Brick Lane is a key issue. Parish Council received substantial representation from residents on this matter. Narrow access, with junction width constrained by existing dwellings. Inappropriate, unsafe, would create a dangerous environment for existing residents. Brick Lane in poor condition. Traffic noise would be unfair on existing residents.
- Brick Lane/Sutton Road junction has poor visibility due to gradient and road layout, parked vehicles and bus stops. Dangerous for pedestrians.
- Access should be provided from Sutton Road, preferably from a new roundabout at the junction of Sutton Road and Witcham Road which could help restrict speed and reduce traffic volumes on Brick Lane.
- Development would severely impact view from the houses in Brick Lane.
- Bungalows preferable to houses.
- Tall hedge running alongside Brick Lane should be retained.
- Brick Lane is a quiet road, where children play, and is used by walkers, dog-walkers, horse-riders to access bridleway to Sutton Gault.
- Brick Lane has a history of water/sewerage problems, requiring investigation, and may be made worse by additional development. Surface water drainage ditch alongside Brick lane should be retained.
- Site currently absorbs substantial run-off and often lay wet.
- Property at west end of Brick Lane suffers from flooding issues, and should be remedied through development.
- No residual capacity in surface water receiving system – necessary surface water accommodation should be put in place prior to development.
- New development should install protection from traffic noise – affordable housing should not be used for this purpose. Existing vegetation insufficient at blocking noise.
- Site owner/promoter welcomes allocation of the site. However suggests Policy Mepal4 is reworded so as to give greater flexibility and to not prejudge how site access and landscaping should be designed.

Site/20/01 North-east Mepal (rejected site)

- Site promoter objects to rejection of site.
- Site can make a valuable contribution to housing land requirement.
- Site is in a sustainable location. Good access to services and facilities.
- Available to deliver and in single ownership.
- Objects to the site being described as public open space. It is private land in agricultural use.
- PROW onsite can be diverted or incorporated into site layout.
- Site is agricultural in character and is likely to be of low ecological value.
- Site Assessment Evidence Report provides no assessment of the potential impact of the development on the County Wildlife Site (located to the north-west). No assessment of

- trees has been undertaken to support CWS SPD.
- CWS could be incorporated into site.
- Church site is well contained within defined grounds, and screened by mature trees and hedgerows. Therefore development would no fundamentally alter the character and setting of the church – and could provide an opportunity to improve setting of the church.

Site/20/02 Land west of Mepal Church (rejected site)

- Site promoter objects to rejection of site.
- Site can make a valuable contribution to housing land requirement.
- Site is in a sustainable location. Good access to services and facilities.
- Available to deliver and in single ownership.
- Questions ecological value of CWS present on site, and suggests this could easily be incorporated into site layout.

New Site(s) suggested

- Site/20/03 Land south of Witcham Road
- Site/20/04 Land between New Road and Witcham Road

Settlement: Newmarket Fringe

Summary of issues raised

Overarching Issues/Concerns

- Proposal for allocation of Local Green Space at Peterhouse Drive, in Newmarket. Local children use this playing field for outdoor pursuits, and it is the only open space in the area for them to do so.
- Support for development proposals which contribute to maintaining the community facilities at present.
- The economic and character contribution made by the horse racing industry to the town, and that this should be respected within any new development.

Settlement: Prickwillow

Summary of issues raised

Infrastructure and Other constraints

- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development.

Settlement: Pymoor

Summary of issues raised

Site Specific Comments

PYM.H1 Land north-east of 9 Straight Furlong

- No residual capacity in surface water receiving system. Necessary surface water accommodation should be put in place prior to development of the site.

New Site(s) suggested

- Site/16/09 Land at Mount Pleasant Farm

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| <ul style="list-style-type: none"> • Site/16/10 Land at Straight Furlong • Site/16/11 Former Memorial Hall |
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<h3>Settlement: Queen Adelaide</h3>
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<h4>Summary of issues raised</h4>
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<u>Infrastructure and Other constraints</u>

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| <ul style="list-style-type: none"> • Policy Queen Adelaide2 should include provision of Superfast Broadband. • Surface water receiving system has no residual capacity. Necessary surface water accommodation should be put in place prior to development. |
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<h3>Settlement: Reach</h3>

<h4>Summary of issues raised</h4>
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<u>Overarching Issues/Concerns</u>

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| <ul style="list-style-type: none"> • Support for the current development envelope and protection of views across the landscapes around the village, including an SSSI and a European designated nature reserve. • Support for Hythe as accessible Local Green Space. • Reach1 also need to refer to protecting the natural environment and only identifies the Devils Dyke for protection. • Increase in dwellings in Burwell, Bottisham and Swaffham Bulbeck will impact on Reach transport links and this should be mentioned in Reach2. • Support for improvements to cycle paths and routes for the Villages of Reach, Prior and Bulbeck to access into Cambridge. • Amendments to Reach1 policy is suggested and also the text in paragraph 7.29.1. • Support housing development backed by housing needs survey up to 10 dwellings. |
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<u>Infrastructure and Other constraints</u>

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| <ul style="list-style-type: none"> • Amend Reach2 policy to reflect changes and new infrastructure requirements. |
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<u>New Site(s) suggested</u>

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| <ul style="list-style-type: none"> • Suggested amendment to Development Envelope to include garden land in Great Lane, Reach. |
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<h3>Settlement: Snailwell</h3>

<h4>Summary of issues raised</h4>
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| <ul style="list-style-type: none"> • No comments were made in specific relation to Snailwell. |
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Settlement: Soham
Summary of issues raised
<u>Overarching Issues/Concerns</u> <ul style="list-style-type: none"> • Support for Soham1, in relation to protecting Soham setting etc • Support for Soham2, in relation to developer contributions • Object to growth – how will Soham cope? • Concerned about loss of community feel
<u>Infrastructure and Other constraints</u> <ul style="list-style-type: none"> • Scale of development could put pressure on existing green infrastructure, including Soham Wet Horse Fen SSSI and County Wildlife Sites. • An integrated landscape, ecology and access management strategy is needed for Soham's green infrastructure assets, esp the Commons • Soham13 (Green Lanes and commons) – support, but revised wording suggested. • Lack of facilities in Soham to take growth – shops, doctors, • Surface water /sewerage is already a problem – more housing will make it worse. • Support proposed growth, but only if infrastructure provided and the development envelope is used to strictly control further 'creep'.
<u>Site Specific Comments</u> <ul style="list-style-type: none"> • Support for various site specific policies which stipulate the need for open space, protection of the Commons etc • Various proposed allocations have the potential to have an adverse effect on European protected sites and SSSI, through increased recreational pressure. Policy for sites needs a requirement for HRA and a requirement for a net gain in biodiversity.
SOH.H1 Land off Brook St <ul style="list-style-type: none"> • All / Part lies within Mineral Safeguard Area – if mineral is extracted, it should be put to sustainable use. Policy should refer to this.
SOH.H5 Land south of Blackberry Lane <ul style="list-style-type: none"> • All / Part lies within Mineral Safeguard Area – if mineral is extracted, it should be put to sustainable use. Policy should refer to this. • Object to improve crossing of A142 – this could increase dog walkers etc, and thereby impact on SSSI.
SOH.H6 Land north of Blackberry Lane <ul style="list-style-type: none"> • Object to improve crossing of A142 – this could increase dog walkers etc, and thereby impact on SSSI.
SOH.H7 Land west of Cherry Tree Public House <ul style="list-style-type: none"> • All / Part lies within Mineral Safeguard Area – if mineral is extracted, it should be put to sustainable use. Policy should refer to this.
SOH.H8 Land east of The Shade <ul style="list-style-type: none"> • All / Part lies within Mineral Safeguard Area – if mineral is extracted, it should be put to sustainable use. Policy should refer to this.

SOH.H9 Land south of Cherry Tree Lane, west of Orchard Row

- All / Part lies within Mineral Safeguard Area – if mineral is extracted, it should be put to sustainable use. Policy should refer to this.

SOH.H10 Land off Kingfisher Drive

- Site should have its own policy
- Site is close to Soham Water Recycling Centre. Buffer will need agreeing. Detailed policy wording suggested (Anglian Water)

New Site(s) suggested

- Site/23/41 Land at Mereside
- Site/23/42 Land at 117 Mereside and paddock
- Site/23/43 Land east of The Shade
- Site/23/44 Land at Old Tiger Stables
- Site/23/45 Land at Northern Gateway

Settlement: Stetchworth

Summary of issues raised

Site Specific Comments

- The Plan should be amended to include residential estate at Stetchworth Park Stud, Church Lane, Stetchworth (site 24/01)
- The majority of the 15.9 hectares gross being promoted for the equestrian village will remain as paddock land for the grazing and exercising of the horses. The maximum number of dwellings proposed would be twelve.

Settlement: Stretham

Summary of issues raised

Infrastructure and Other constraints

- Stretham2 seeks to provide improved pedestrian/cycle routes to Ely and other key locations. Central Govt has promised funding in the Cycling and Walking Investment Strategy. Reliance on CIL and s106 could result in insufficient resources.
- Stretham2 implies that it prioritises pedestrian/cycle access between Stretham/Ely over other routes – this should be clarified.
- Cycle access between Stretham and Waterbeach is very poor. A link with the proposed upgraded Waterbeach Greenway is important.
- Improved cycle access between Stretham and Wicken would bring additional benefits, including access to Soham, Upware and NCN11/51 to Bottisham and Cambridge.
- Cambs County Council indicates that plans are already in place to expand the primary school in response to development at Manor Farm.

Site Specific Comments

STR.H1 Land at Manor Farm

- Southern half of site lies in Safeguarding Area for Stretham Waste Water Treatment Works – but already has planning permission.
- Plans for primary school expansion in place.

- No residual capacity to accept increased rates of surface water run-off. Surface water should be managed on-site.
- Site is located east of Stretham Conservation Area. Development of the site should conserve, and where opportunities exist, enhance the conservation area and its setting.
- Site promoter supports allocation of site for 100 dwellings (of which 75 benefit from planning permission, with phases under construction), and confirms site is suitable, available and deliverable, contributing to five year supply of housing.

Site/25/01 Land to the north of Berry Close (rejected site)

- Site promoter objects to non-inclusion of site.
- Site Assessment Evidence Report acknowledges that site has merit as a development site – site promoter suggests site has significant development potential.
- Stretham is a Large Village and offers a wide range of services and facilities, and is therefore a sustainable location to accommodate development.
- Village services and facilities are within walking/cycling distance of the site.
- Impact on primary school capacity likely to be limited.
- Parish Council raised concerns about local road impact. However local highways authority did not object to the site, subject to reasonable mitigation measures.
- Site is of negligible ecological value.
- Development would not cause undue harm on views of wider countryside, Ely Cathedral, Stretham Conservation Area, listed buildings or scheduled monuments.
- Landscape buffer on northern boundary would reduce visual impact on countryside.
- PROW adjacent to site would be largely unaffected by development.
- Site suitable and available for development, and will contribute to increasing supply of housing within five years.
- Site would deliver public benefits in terms of public open space, additional market and affordable housing, and enhanced PROW.
- Site should be allocated for approximately 50 dwellings and associated public open space.

Site/25/03 Wilburton Road (rejected site)

- Site promoter objects to rejection of site.
- Site would provide an attractive new development well-related to the existing settlement. Vehicular access can be achieved from Wilburton Road.

New Site(s) suggested

- Site/25/08 Land off A10 at Stretham / Lt Thetford

Settlement: Stuntney

Summary of issues raised

Infrastructure and Other constraints

- Road-level crossing at new roundabout will not be acceptable for cyclists. Underpass under roundabout, or cyclepath to NCN11 and improvement of that onward route should be provided to ensure cycle connectivity between Stuntney and Ely.

Settlement: Sutton

Summary of issues raised

Overarching Issues/Concerns

- Description of Sutton (in paras. 7.35.1-2) is over optimistic in identifying local services and facilities. This contradicts data in the Settlement Hierarchy report which suggests Sutton has low level of facilities despite its large size.
- Sutton has grown substantially in recent times - suggestions that the village has grown by in the region of 25% or 30% over the last 15+ years – a greater proportion of growth than other settlements, with development ‘crammed’ in, too few open spaces and lack of investment in infrastructure and services.
- Development has been piece-meal without a coordinated plan.
- Concerns development will make Sutton a small town, rather than a village.
- Whilst Sutton1 addresses the protection of views from the village, a major concern is the protection of external views of the village particularly from the fen south and west of the village.
- Isle character and imposing church tower most obvious when viewed from outside village. Views of the church from the surrounding fen to the south should be protected.
- At the same time the plan was out to consultation, a developer was promoting larger schemes which incorporate two of the draft site allocations. This led to fears that the plan was unreliable, not robust or misleading.

Infrastructure and Other constraints

- Sutton2 includes a requirement for a new burial ground north of The Brook. This need not be located north of The Brook, provided it is funded by development on that site (north of The Brook).
- Parish Council proposes a series of changes to Sutton2, including requirements for additional play equipment at Stirling Way play area for toddlers and juniors; creation of a new equipped youth play area; additional multi-functional sports fields; new burial ground at suitable location in parish boundary; and include references to LP21 and LP29.
- Village infrastructure is under strain and does not meet the needs of the current population – shortage of play space and facilities; school above capacity; pre-schools near full; traffic congestion; GP surgery expanding, belatedly, and has long waiting times.
- Concerns GP surgery won't be able to meet needs of village in future due to increase in population.
- Requirement for traffic management (Sutton2) is too vague as village is suffering enormous traffic volumes. High Street is restricted and dangerous due to parked vehicles and bus stops.
- Effect of development at Sutton and Mepal will impact on safety and capacity of A142 between Mepal and Ely, especially at Sutton roundabout, Witcham Toll, Lancaster Way roundabout, BP garage roundabout, and also on A10 from Ely to Cambridge.
- Cambridgeshire County Council (the LEA) indicates that the primary school will need to expand by 0.5FE or 105 places, in response to the proposed level of development. There is also emerging pressure on places at Witchford Village College (secondary school) and appropriate mitigation needs to be considered. The College can be expanded on its present site.
- Questions whether list of infrastructure requirements (Sutton2) have been evaluated, and if value is reasonable or unaffordable.
- Concerns whether policy Sutton2, which sets out infrastructure priorities is deliverable and compliant with CIL regulations.
- Lack of a practical plan to deliver infrastructure outlined in Sutton 2.
- Plans to control traffic should be agreed in advance of new development.
- Infrastructure gap should be met ahead of new development proceeding.

Site Specific Comments

SUT.H1 Land north of The Brook and west of Mepal Road

- Development of site should fund provision of new burial ground.
- Fears that allocation of the site will lead to a much larger-scale development than is set out by the draft policy, as a developer is currently engaging in pre-application consultation in the area.
- Concerns that development of the site will split Sutton into two halves, resulting in village losing its centre.
- Concerns that site will not be delivered sustainably due to shortfall of school places, and limited bus service. Suggestion that development is phased in a manner which reflects school capacity.
- Concerns that transport issues have not been addressed, and development will generate extra traffic volume, pollution, noise, vibration, and speeding.
- Parish Council has proposed amended wording to policy Sutton4, including development should provide: a maximum of 250 dwellings, new multi-functional sports fields, provision towards a multi-use game area along with public open space and areas of play for infant, junior and youths, burial ground at suitable location in village, landscape buffer providing a wildlife corridor joining to green space within the development at northern boundary to frame development.
- Developer requests that indicative dwelling figure is increased from 250 dwellings to 427, as lower figure would be an inefficient use of land.
- Developer confirms site would deliver the policy requirements set out in Sutton4, and that the site is controlled by a housebuilder and is deliverable.
- Technical assessment of site demonstrates that contamination is not a constraint to development.
- Whilst site is located greater than walking distance from some services, public transport provides realistic alternatives, with bus stops located at The Brook.
- Previous/other community consultation exercises suggest site is most favoured by local residents.

SUT.H2 Land east of Garden Close

- Development of the site will have a great visual impact on the village; and will change character of this part of the village, turning it into a noisy estate.
- Site is a 'green lung' for village, is a valuable habitat for local wildlife, and is close to the historic village core with its unique isle character.
- Green area that makes Sutton a pleasant place for families to live and to get outdoors. Pleasant and tranquil; one of the last green areas in the village. Provides rural village edge.
- Abundance of biodiversity and wildlife including Sparrow Hawks, Owls, Deer, Great Crested Newts, Woodpeckers, Frogs, Pheasants and more. Presence of newts could be a constraint to development.
- Hedgerows and trees should be retained.
- New habitats and green spaces should be created. Habitat buffer should be provided to protect existing species.
- A scheme of 25 low-density single-storey dwellings preferred, to reflect neighbouring development.
- High-density, 2-3 storey town/urban style development would harm rural feel and character, and block light and views.
- Concerns development of site will lead to increase in traffic, congestion, noise and air pollution, parking issues and that highway access is not suitable to serve development. Safety concerns for Lawn Lane junction with High Street.
- Effect on water management, flood control and water infrastructure. Site susceptible to flooding. Concerns run-off from site will flood the recreation ground, and that water table will

rise in Garden Close, affecting neighbouring dwellings. Fear that drainage solution won't be as good as leaving site undeveloped.

- Fears that allocation of the site will in fact lead to a much larger-scale development than set out by the draft policy, as a developer is currently engaging in pre-application consultation in the area.
 - Development would harm residential amenity of neighbouring development, and result in loss of views of open countryside.
 - Development would affect views of church and village. Has potential to impact on setting of conservation area.
 - Site was rejected from Local Plan 2015 due to high landscape value, lack of local support, and availability of more suitable sites.
 - Some suggestions that site could provide accommodation for the elderly. However, some concerns around accessibility for elderly/disabled people due to steep incline of Lawn Lane.
 - Suggestion that an agreement is already in place that land east of Garden Close would not be built on for 99 years.
 - Perception that SUT.H1 is better placed to accommodate development and will deliver more community benefits, and therefore SUT.H2 isn't necessary.
 - In previous consultation exercises, not popular with community. Many responses of local opposition.
 - Far from village amenities.
-
- Site promoter supports allocation but considers extent of the allocation and policy wording should be changed, to enable development of up to 60 houses – planning application currently being worked up.
 - Site boundary should be extended to include land to the south – see additional site suggestion Site/26/14.
 - Higher level of development would support area's five year land supply.
 - Development would deliver public benefits, such as public open space.
 - Site should not be restricted to low density development.
 - Hedgerows and trees are of no particular value.

SUT.E1 Elean Business Park

- Site boundary should be amended to include Sutton Sale Ground to west (see additional site suggestion Site/26/12).
- Site should have its own bespoke policy. One such requirement should be to prepare a development brief or masterplan for the site.
- There are a number of existing developed areas within the site. The plan implies 35ha of land is available, but is much less and should be clarified.

LGS/26/04 The Paddock & Old Recreation Ground (rejected LGS submission)

- Objects to rejection of site and assessment process applied. Assessment concluded site is an 'extensive tract of land' - respondent argues that this criterion should be determined relative to size of settlement and development sites, and is therefore not extensive in context of Sutton. Allocation of the site would contribute to achieving the Fields in Trust standard for accessibility to informal open space.

Site/26/02 Land off Station Road (rejected site)

- Site promoter objects to reasons for rejection of site.
- Indicates site has safe, convenient access to village services, and cycling and public transport opportunities.
- Site is available now and deliverable within five years.
- Additional traffic movements arising from development and impact on school capacity likely to be negligible.

- Careful design will ensure setting of Conservation Area is not unduly affected.

Site/26/03 Land off The Row/The America (rejected site)

- Objects to the rejection of the site and to findings of the site assessment process.
- Site is enclosed and can be readily assimilated into landscape and will not have significant impacts on village character.
- Positive market conditions.
- Hedgerow and specimen trees will be retained/replanted.
- Site is within walking distance of village services and facilities.
- Surface water run-off from site will be managed.
- Vehicular access will be taken from The Row.
- Site is in a sustainable location and will come forward rapidly, contributing to five year housing land supply.

Site/26/08 East of Bury Lane (rejected site)

- Site promoter objects to the reasons for rejection of the site, and suggests that development of the site, along with Site/26/09, would complement the existing development and form a natural extension of Sutton.
- No formal landscape designations covering site, and visual impact will affect only a small number of dwellings.
- Improvements to highway network can be readily achieved through planning application process. Option of vehicular access from York Road has not been considered by the Council.
- Site is a sustainable location, with access to local services and facilities, and would make a valuable contribution to the housing land requirement.

Site/26/09 West of Bury Lane (rejected site)

- Site promoter objects to the rejection of the site, and suggests that development of the site, along with Site/26/08, would complement the existing development and form a natural extension of Sutton.
- Development would not have significant impacts on landscape character or visual amenity, limited to those properties which overlook it. The site has no landscape designations.
- Development would create new areas of open space which are accessible and better managed.
- Development would seek to retain mature trees and vegetation pattern, where possible, and would enable improved management of Great Spinney.
- Site is a sustainable location, with access to local services and facilities, and would make a valuable contribution to the housing land requirement.

New Site(s) suggested

- Site/26/11 Land at former Mepal Airfield
- Site/26/12 Sutton Sale Ground
- Site/26/13 Land at Mill Field
- Site/26/14 Land east of Garden Close
- Site/26/15 Land north of Bellairs

Settlement: Swaffham Bulbeck

Summary of issues raised

Overarching Issues/Concerns

- The village is in part bounded by the Cambridge Green belt.
- The policy should clearly state what direct impacts a development is likely to have and make clear which infrastructure should be funded from CIL payments.
- The draft plan does not use the results of the hierarchy to distribute growth.
- The requirements to enhance the conservation area and listed buildings and their settings should be included in Policy Swaffham Bulbeck 3 and Swaffham Bulbeck 4.

Infrastructure and Other constraints

- Support to improvement of cycle paths and any improvements to access across the river Cam to Waterbeach areas.
- Swaffham Bulbeck1 policy should include the village green known as The Denny.
- Swaffham Bulbeck2 policy should include cemetery extension. A pedestrian crossing from The Denny to Station Road has now been provided, negating this requirement.
- The junction between High Street and Quarry Lane should be improved to enable sensible sight lines.
- Speed limit should be reduced to 20mph in High Street.
- The primary school cannot be expanded.
- Bottisham VC secondary school is being expanded.
- The necessary surface water accommodation should be put in place prior to the development of the site to protect lands and properties from increased flood risk.

Site Specific Comments

SWB.H1 Land off Heath Rd and Quarry Lane

- Development will have impact on green corridor, listed buildings, adjoining Conservation areas the Denny Scheduled Monument site. Limit to 40 dwellings.
- Not suitable for development- considered as an area of best landscape value, site too large, and development will affect key views of the village.
- Vehicle access via Quarry Lane and protect major open corridor space.
- The site is available for immediate development, will come forward as CLT development, could provide extension to cemetery, additional village car parking and provide affordable housing.

SWB.H2 Land fronting Heath Rd

- Support for development on site, should improve pedestrian and cycle access.
- There are two grade II listed buildings (Hillside Cottage and Hillside House) to the east of the site. Any development of this site will need to conserve and where opportunities arise enhance listed buildings and their settings.

New Site(s) suggested

- Site/27/06 Hillside Mill
- Site/27/07 Land north of Station Rd
- Site/27/08 Land north of Green Bank Rd

Settlement: Swaffham Prior

Summary of issues raised

Overarching Issues/Concerns

- One comment suggested that as a medium village, Swaffham Prior could accommodate more allocated sites.

Infrastructure and Other constraints

- No comments were made in respect of infrastructure or other constraints

Site Specific Comments

DE/28/01 Land north of Mill Hill and DE/28/05 Land adjacent to 75 High Street

- Originally submitted as development envelope changes, without a site submission. Now being promoted as a site submission for the combined area (Site/28/06)

LGS/28/04, 05, 07 & 08 (rejected sites)

- The Local Green Space promoters disagree with the findings of the assessment of the site, stating that they believe, despite being an extensive tract of land, the site fulfils the criteria for a Local Green Space.

New Site(s) suggested

- Site/28/06 Land South of High Street
- Site/28/07 Adjacent to 38 Mill Hill

Settlement: Upware

Summary of issues raised

Overarching Issues/Concerns

- Support for a bridge over the river to open up improved cycle and foot paths around and through the countryside.
- Sewage arrangements will need to be improved to support the needs of the village in light of its inability to cope with current usage.
- Pavements and street lighting should be improved
- Improvements to the junction with the A1123 and the Upware Road

Settlement: Wardy Hill

Summary of issues raised

Infrastructure and Other constraints

- Policy Wardy Hill2 should include extension of 30mph speed limit and improvements to schools, roads, transport and health services throughout the district.
- Surface Water receiving system has no residual capacity. Necessary surface water accommodation should be put in place prior to development.

Settlement: Wentworth

Summary of issues raised

Overarching Issues/Concerns

- Development boundary drawn very tightly restricting development opportunities which could help deliver infrastructure and facilities.
- Proposed amendment to development envelope at land adjacent to Garwood Lodge, Main Street is supported; reflecting planning permission 16/00299/VAR, is supported.

Infrastructure and Other constraints

- Wentworth needs improvements to the village hall, and Witchford needs school places.
- Surface water receiving system at capacity. Surface water accommodation should be provided prior to development of site.

Site Specific Comments

Site/29/01 Main Street (rejected site)

- Development boundary should be amended to include land to the rear of No 3 Main Street, which is developable and deliverable.
- Housing development of site would provide infrastructure and community facilities.

New Site(s) suggested

- Site/29/04 Land south of Witcham Toll
- Site/29/05 Land at Marroway Lane (NB. Adjoins Witchford village)
- Suggested change to Development Envelope to include land rear of 3 Main St

Settlement: Westley Waterless

Summary of issues raised

- No comments were made in relation to Westley Waterless.

Settlement: Wicken

Summary of issues raised

Overarching Issues/Concerns

- 7.42.1-2 – revised wording for paragraphs suggested (and set out in detail) by Parish Council, setting out a slightly longer description of the village, its facilities and Wicken Fen.
- Wicken is not urban – design solutions must be a rural solution
- 2 bed housing needed – as reflected in 2015 ACRE study
- Sufficient off-road parking is needed.
- Development envelope is out of date / doesn't reflect recent permissions
- Wicken has received a large volume of dwellings approved in last few months on small sites, and more pending. This is not reflected in the Local Plan, but should be taken account when allocating any new sites.

Infrastructure and Other constraints

- Various suggestions for infrastructure items to be added to Wicken2 (including: shop; cycle routes; bus services; public realm; sewerage; traffic calming)
- Roads aren't safe to cope with more development
- Lack of amenities: no shop, school, post office
- Sewerage on Chapel Lane is a known problem, and cannot cope – development will make worse
- Surface water must be dealt with appropriately – the internal drainage system has no capacity to take further surface water.

Site Specific Comments

WIC.H1 Land off Lower Rd

- Object due to impact on recreational area, traffic and inadequate sewerage facilities
- Object to phrase 'urban design solution' – Wicken is rural not urban
- 24 dwelling estate development scheme is not in-keeping with Wicken character
- Far too dense: should be 8-10 dwellings
- Site should be deleted (poor access / encourage ribbon development), and instead coordinated development within Chapel Lane / Drury Lane area should be promoted.
- (Promoter) – site should be enlarged to south, and increased to 40 dwellings
- (Promoter) – first bullet (groups of dwellings) overly restrictive. Should simply be a need for a 'masterplan'.
- WIC.H1 policy and supporting text should refer to need to conserve / enhance nearby conservation area and listed buildings

WIC.H2 Land south of Chapel Lane

- Policy and supporting text should refer to need to conserve / enhance nearby conservation area and listed buildings

Site/31/03 Land off Hawes Lane

- Site should be reconsidered

Site/31/05 Land between 61 & 71 Church Road

- Site should be reconsidered

Site/31/07 Existing LP15 housing allocation, land north-west of The Crescent

- The 2015 WIC2 allocation should be reinstated

New Site(s) suggested

- Site/31/08 Land rear of 34 & 36 Chapel Lane
- Site/31/09 Land at Lower Rd
- Site/31/10 Land at Chapel Lane

Settlement: Wilburton

Summary of issues raised

Overarching Issues/Concerns

- Stretham & Wilburton Community Land Trust (SWCLT) is active and has support of Parish Council.
- SWCLT should be primary means for delivering housing, as it will ensure the needs of the local community are met and deliver development sustainably.
- Only one site identified, this is insufficient to meet village's needs over plan period – further development would enable SWCLT to meet its aims.
- Wilburton is a sustainable location for growth, and is a thriving, vibrant rural community with local services and facilities, in close proximity of Ely.
- Additional allocations should be made to enable the community to shape future growth, which is important for community cohesion.
- Parish has a disproportionately high number of traveller sites, and cannot accommodate more sustainably.

Infrastructure and Other constraints

- Wilburton Parish Council rejects statement that the village has infrastructure constraints - Wilburton has many community facilities, including three schools, preschool, nursery, pub, social club, shop and post office, garden centre and two churches. Also has a wide range of clubs and societies, and holds civic events.
- School being at capacity indicates its success, as children travel in from neighbouring parishes.
- Opportunity to relocate pre-school using benefits of SWCLT.
- Cambs County Council confirms that primary school is operating close to capacity on a constrained site preventing further expansion. It may be necessary to seek mitigation at a neighbouring village school.
- Surface water receiving system has no residual capacity. Necessary surface water accommodation should be put in place prior to development of land.

Site Specific Comments

WIL.H1 Land off Station Road

- Due to constraints, including listed buildings and features, drainage issues, protected trees means the site would be unlikely to accommodate 30 dwellings (NB: site identified for 35 dwellings). Site area should be extended to include adjacent Site/32/06.
- Site is within Conservation Area and there are several listed buildings to the south of the site. Policy should be strengthened to ensure proposals conserve, and where opportunities arise, enhance the conservation area and setting of listed buildings.
- TPO site scoring (A-C) is incorrect.
- Site promoter fully supports proposed allocation.

Site/32/01 Land west of Clarke's Lane and south of Hinton Way (rejected site)

- Site is in a central village location, and not a greenfield site.
- Landowner keen to work with SWCLT.
- Site should be allocated in plan.
- Site promoter objects to site not being selected as a draft site allocation.
- Disused farmyard and orchard, no longer suitable for modern farming.
- Site is available for development in short term.
- Site assessment flawed / inconsistent, as site scores similarly to draft site allocation WIL.H1.
- Local road impact / access requirements less severe than implied by site assessment evidence report. Site can be accessed via a PROW through The Limes, 1 Church Lane and a gated field access off Hinton Way, and via 13 Clarkes Way.
- Site borders settlement boundary, and is therefore considered a logical extension and well related to built form.
- Site can be designed to ensure no detrimental impact on the character of the Conservation Area.

Site/32/02 Land off Townsend Mews (rejected site)

- Recent planning approvals have set a precedent for ribbon development along Stretham Road.
- Landowner is keen to work with SWCLT to promote a phased housing development.
- Site is sufficiently large to enable development of a mix of house types and tenures.
- If developed, infrastructure improvements would be required, including new footpath on south side of Stretham Road, new zebra crossing and traffic management such as extension of 30mph speed limit.

- Site should be allocated in plan.
- Site promoter objects to rejection of site.
- Site is within walking distance of shops and services.
- Site available for development now.
- Supports CLT development.
- Suitable vehicular access can be achieved.
- Visual impacts on countryside can be mitigated through establishment of landscape buffer at boundaries.
- Careful design and landscaping would ensure development is not detrimental to conservation area.
- Should be allocated for approx. 50 dwellings, supporting retention of facilities and increasing supply of housing.

Settlement: Witcham

Summary of issues raised

Overarching Issues/Concerns

- Development should not be restricted in Small Villages, such as Witcham, which offer a sustainable location for growth. Additional allocations should be made.
- Development boundary is tightly drawn, and historic character of village centre, mean opportunities for windfall development are limited.

Infrastructure and Other constraints

- It is not clear how the infrastructure requirements set out in policy Witcham2 will be delivered, when opportunities for development in the village are limited.

Site Specific Comments

WTM.H1 Kings of Witcham

- Site is located south of the Witcham Conservation Area. The policy should require development of the site to conserve, and where opportunities exist, enhance the conservation area and its setting.
- Surface water receiving system has no residual capacity. Necessary surface water accommodation should be put in place, prior to the development of the site.

New Site(s) suggested

- Site/33/02 Land east of The Slade

Settlement: Witchford

Summary of issues raised

Overarching Issues/Concerns

- Objection to classification as a 'Large Village' – does not meet the criteria.
- Witchford does not have a good range of services - Settlement Hierarchy should therefore be reassessed and housing allocations redistributed.
- Witchford is a large Village due to recent housing growth, without infrastructure to support it. Does not have the services and facilities which might be expected in a large village.
- Plan should have full acceptance of local people.

- Draft site allocations do not reflect the preferences of the Parish Council and Neighbourhood Plan committee – requests explanation. Unwillingness of Council to listen to views of local people.
- Sites on north side of village not sustainable – better options have been supported by residents elsewhere.
- No justification for amount of housing suggested for allocation.
- No residual capacity for surface water receiving system – surface water accommodation should be addressed prior to development of site.
- Further clarity needed about role of planning applications permitted throughout plan preparation process.
- Current proposed allocations do not provide sufficient critical mass to deliver necessary infrastructure.
- Perception that Witchford is already doing its ‘fair-share’, through development of housing at site north of Field End.
- Support for proposed designation of the various Local Green Spaces.

Infrastructure and Other constraints

- Witchford1 should not only maintain community facilities but plan for significant expansion and also respect green areas prioritised for protection.
- Note should be made of the emerging Neighbourhood Plan.
- New developments should make provision for community use to support the rapidly growing needs of the village.
- Provision of medical facilities a key priority amongst residents (‘critical’) – currently no doctors’ surgery in village.
- Improvements to pedestrian/cycle routes required – including cycleway improvements at Lancaster Way Business Park roundabout / cycle lane on north side of LWBP; improvements to Witchford–Wentworth cycle path; increased footpath widths with provision for cyclists; priority for cyclists at road junctions; encourage cycling as a means of transport from the villages (in west of district) through Witchford to Ely.
- Traffic management including traffic controls on Main Street and calming near Rackham Primary School, to reduce congestion and village being used as a ‘rat-run’.
- Cambs County Council indicates that the cumulative impact of growth would require expansion of existing primary school. However, this may be difficult to achieve on current site and discussion with planning authority and developers may be required. There is emerging pressure on Witchford Village College (secondary school) – this can be expanded on current site.
- Witchford Parish Council believes proposed housing allocations will have a significant detrimental effect on educational, medical, public transport and highways services.
- Existing open spaces should be retained, especially those along southern side of Main Street which give views into the landscape.
- No shops providing day to day items, Post Office offers limited range only.
- Public transport is poor, 2-hourly service during peak and no Sunday service. No direct bus to Ely station. Car dependent.
- Concerns for primary school and pre-school capacity – currently oversubscribed – lack of plan for how this will be remedied.
- Witchford has large equine population and busy horse riding centre, livery yards, professional trainers’ yards and domestic yards – Local Plan does not make provisions to support these businesses and recreational pastimes. Improvements to bridleways and improved connections from village to countryside required.
- Developer contributions should be aggregated to ensure sufficient funding for major schemes including doctors surgery and roundabout on A142 at the Common Road junction.
- Scale of developer contributions should be proportionate to the scale of the impact of the development on amenities and facilities.

- Policy Witchford1 which requires development to contribute to maintaining community facilities is not compliant with CIL r122 and the requirement should be removed.
- Contributions over and above CIL should be fairly and reasonably related to the development proposed and cannot be sought to address an identified shortfall – policy Witchford2 (which provides a list of infrastructure requirements) does not comply with national policy and should be removed.
- Reference to the BP garage should be clarified – A10/A142/Witchford Road junction.
- Policy Witchford2's requirement for a bridge over A10 should be removed as it prevents alternative and potentially better or deliverable alternatives from being considered – need more flexibility.
- Support for a green wedge policy, with several suggestions for its location/extent, focussing on an area north and south of Ely/Witchford Road, between Lancaster Way Business Park and Witchford village.
- Green wedge should be designated as Local Green Space to ensure a high level of protection.
- Green Wedge essential to protect character and identity of village.
- Green Wedge should ensure views of Ely and Cathedral from Witchford village are maintained.
- Green Wedge should seek to ensure Lancaster Way Business Park does not extend toward Witchford village.
- One objection to proposed green wedge policy on the basis that land between Witchford, Ely and Lancaster Way Business Park is classed as open countryside and is therefore protected from development.

Site Specific Comments

WFD.H1 Land north of Field End

- Noisy and polluted, therefore risk to health.
- Will lead to increase in traffic levels.
- Site has longer distant view of Ely Cathedral. Not clear whether site would impact on view, but this should be considered. Council should demonstrate historic environment impacts would be acceptable.
- Site promoter supports draft allocation of the site.
- Site has outline planning permission for up to 128 residential dwellings, including 30% affordable housing.
- Site will be developed in accordance with principles of planning permission within five years (subject to approval of Reserved Matters).

WFD.H2 Land east of Marroway Lane

- Noisy and polluted, therefore risk to health. Proposed green buffer not sufficient to overcome health concerns.
- Will lead to increase in traffic levels.
- Site has longer distant view of Ely Cathedral. Not clear whether site would impact on view, but this should be considered. Council should demonstrate historic environment impacts would be acceptable.
- Site promoter supports draft allocation, and indicates that the site will deliver: approximately 55 dwellings; 0.36ha of public open space; network of footways and cycle paths; and 6m woodland planting landscape along northern boundary.
- Site is deliverable within five years.

WFD.H3 Land off Meadow Close

- Site was ranked low preference by residents and Parish Council - feel they haven't been listened to.
- More suitable sites available elsewhere in village. Considerable support for removal of site from plan and replacement with site north of Common Road (see Site/34/14) – which, it is suggested, is more suitable for development, could deliver more dwellings, less impact on neighbouring dwellings, and could address a number of key issues – for example, provide a new access to Village College, provide site for new primary school, etc. Other suggestions include replacing site WFD.H3 with land south of Sutton Road (see Site/34/01).
- Village envelope should be redrawn to exclude site.
- Site access main reason for objection - site not appropriate for development due to lack of safe, suitable vehicular access. Meadow Close is narrow and congested due to on-street parking and volume of traffic accessing the Village College (mornings, afternoons, evenings and weekends); often gridlocked and a danger to children crossing; already at crisis point for existing residents.
- Lack of availability of parking it results in parking on-street, reducing the Meadow Close to a single lane.
- Access cannot be achieved via Broadway, as road is narrow and adjacent land is Common Land and cannot be developed.
- Development will also exacerbate traffic problems on Common Road.
- Vehicle access to Main Street difficult at busy times of day due to poor junction visibility.
- Additional traffic a safety risk for road users and pedestrians, namely children accessing primary school and Village College.
- Lack of suitable access a reason for rejecting sites elsewhere – should apply to this site.
- Sloping site down toward Broadway.
- Development could increase flood risk for housing at Broadway which frequently floods and sewerage system becomes blocked, most recently in Dec 16. Risks to structural integrity of existing dwellings (subsidence, etc.).
- Grunty Fen Main Drain passes through the site – this drains Grunty Fen area and is a vital asset that cannot be impacted by any proposed development.
- Site is elevated above housing at Broadway and would therefore result in loss of privacy for housing at Broadway.
- Existing dwellings on Meadow Close with frontage facing the field, loss of open field through development would result in loss of character and appeal, and would lead to properties being overlooked, lose privacy, be disturbed by noise and spoil visual amenity.
- Sandpit Drove, located at end of Broadway, is a conservation area managed by the Village Open Space Group – development would harm the recreational value of this amenity.
- Quiet area with views toward Ely over fields.
- Development would cause noise pollution.
- Development of site does not support local development needs and priorities – such as infrastructure improvement, community led development, open space, etc.
- Northern section of site should be reserved for expansion of Village College / development of Sixth Form College.

WFD.E1 Sedgeway Business Park

- Site has longer distant view of Ely Cathedral. Not clear whether site would impact on view, but this should be considered. Council should demonstrate historic environment impacts would be acceptable.

Site/34/02 Land west of Mills Lane (rejected site)

- Parish Council objects to rejection of site. Considers site suitable due to its location away from busy, noisy roads; large areas of green space linking to pathways would enhance village's vitality; good access roads; non-intrusive impact and close proximity to centre of the village; offers 30% community-led development.

Site/34/06 Land at Main Street (rejected site)

- Site promoter objects to rejection of site.
- Site rejected reflecting views of Parish Council – not a sound rationale for excluding the site.
- Open aspect and countryside views offered by site could be retained through retention of footpaths/PROW on site.
- Development could facilitate expansion/improvements to Rackham primary School by offering land for a staff car park.
- Excellent access to local services and facilities.
- Better suited for allocation than any other draft site allocation.
- Could provide up to 55 dwellings.
- Would not have severe impacts on highway network.
- Available for development within 3 years.

Site/34/07 Land south of Main Street (rejected site)

- Site promoter objects to rejection of site, as site scores similarly to other sites which were selected as draft allocations.
- Originally assessed on the basis of 60 dwellings, now promoted for 46 dwellings.
- Suitable and available for development within five years.
- Outline planning application submitted.

LGS/34/11 Field west of West End (rejected LGS submission)

- Objects to rejection of sites as Local Green Spaces – important to maintain the rural character of the village by preventing ribbon development. At threat of development and should be protected.

LGS/34/13 Open space south of Ward Way (rejected LGS submission)

- Objects to rejection of sites as Local Green Spaces – important to maintain the rural character of the village by preventing ribbon development. At threat of development and should be protected.

LGS/34/15 Field east of Millennium Wood (rejected LGS submission)

- Objects to rejection of sites as Local Green Spaces – important to maintain the rural character of the village by preventing ribbon development. At threat of development and should be protected.
- Concern that the site (and adjoining land) may be subject to a speculative planning application. Site should be allocated in the plan to enable expansion of the primary school.

New Site(s) suggested

- Site/34/11 Land south of Sutton Road
- Site/34/12 223 Main Street
- Site/34/13 Land rear of 223 Main Street
- Site/34/14 Land at Common Road
- Site/34/15 Land rear of Needham's Farm Barn
- Site/34/16 Land south of Main Street
- Also note, the following sites which adjoin Witchford village but are located in adjacent parishes:
 - Site/10/29 Site to the north east of Witchford
 - Site/29/05 Land at Marroway Lane

Settlement: Woodditton and Saxon Street
Summary of issues raised
<u>New Site(s) suggested</u>
<ul style="list-style-type: none"> • Site/35/03 Land at Stetchworth Road • Change to development envelope requested at Ditton Green

Appendices
Summary of issues raised
<u>Appendix A – Open space, sport and recreation standard</u>
<ul style="list-style-type: none"> • No comments were received in relation to this appendix
<u>Appendix B – Parking provision standards</u>
<ul style="list-style-type: none"> • A comment relating to existing parking problems in Soham; • The cycle parking standards should include quality (e.g secure, covered and lit) as well as quantity. Stronger statements could be made around facilities such as shower and changing facilities at employment locations; • Car and cycle parking requirements for railway stations should also be included.
<u>Appendix C – Neighbourhood planning</u>
<ul style="list-style-type: none"> • A comment stating that proper notice should be taken of Town and Parish Councils; • A number of comments relating to a specific site (Kennett) were also received.
<u>Appendix D - Glossary</u>
<ul style="list-style-type: none"> • Registered Parks and Gardens and Locally Listed Buildings should be included.