

Regulation 16 Consultation – Draft Reach Neighbourhood Plan

ECDC published for consultation the draft Reach Neighbourhood Plan for the period 22nd June - 3rd August 2023. The table sets out all comments received during the publication period. A total of 20 were received. Comments are arranged alphabetically by name of organisation, or by surname where submitted by an individual. Original copies of the representations are held by ECDC.

Name	Date Received	Comments
Claire Acklam	24/7/2023	<p>I write to express my wholehearted support for the draft Neighbourhood Plan. I believe that it is an important document that reflects accurately the views of villagers who participated in the process and that it will be a valuable record for the future in protecting the aspects of Reach that are most precious and potentially vulnerable to irreversible change. I also believe that the community of Reach has a responsibility to acknowledge and actively safeguard those particular and unique characteristics for future generations.</p> <p>I would also like to pay tribute to the villagers who put the plan together. They have worked enormously hard over a considerable time to ensure that the process was fair, transparent and accessible to all villagers who wished to participate in it. There were ample opportunities to follow the progress of its development and to express views and opinions. These were scrupulously recorded and huge amounts of personal time and effort were given over by members of the Neighbourhood Plan Group to gather and collate a wide range of information, both from villagers and external, objectively independent experts, that helped inform the final draft document.</p> <p>The document will, if passed, allow Reach to thrive and develop within carefully judged parameters so that the very best features of this special village can continue to create a vibrant environment for the present, but be preserved for the future inhabitants lucky enough to live here.</p>
Nicholas Acklam	18/7/2023	<p>I support the Reach Neighbourhood Plan (NP) as submitted. I believe that the draft NP accurately reflects the views of the majority of Reach residents and will usefully supplement ECDC's Local Plan. By adding detail and colour to the Local Plan, the NP will help protect the things that residents value about living in Reach, especially the tranquillity, the ease of access to recreational space and the village's uniqueness as a discrete and largely unchanged fen-edge community. The Plan will also assist in addressing aspects of living in Reach identified by residents as requiring remedial action. These include developing vehicle-free routes to neighbouring settlements and removal of the redundant sewage works on the Hythe.</p> <p>I consider that work to develop the NP has been assiduously conducted and, in the context of this stage of process, has involved extensive engagement with external stakeholders. Responses by statutory bodies to the pre-submission consultation concurred</p>

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		<p>with (and in some instances were positively supportive of) its policies. In a letter of 23 July 2021 Edward Dade, the then Strategic Planning Officer for ECDC commented: that the NP’s spatial strategy RCH1 ‘makes adequate provision for Reach Neighbourhood Area’s development needs over the plan period’, ‘meets SEA Regulations and Habitats regulations’ and concludes that the NP is ‘capable of satisfying the basic conditions and other relevant legal obligations’.</p> <p>The submission of this draft NP to ECDC has been delayed by a vocal group in the village who oppose the modification of the development envelope at 16 Chapel Lane that the draft proposes. All indications are that the group is a minority in the village. Furthermore the group has failed to make the case for retaining the development envelope in its current form.</p> <p>Modification of the current development envelope is a core policy proposal of the NP (RCH1) and its retention is key to the credibility of the plan as a whole. The case for modifying the development envelope is, in my view, compelling and based on the following:</p> <ul style="list-style-type: none"> • The land in question is subject to a section 52 agreement implemented by ECDC in 1989 to ‘safeguard the character of the area’. The current owner purchased the land some years after the section 52 agreement had been implemented. • Amendment of the development envelope is consistent with subsequent planning decisions related to the site. ECDC’s Planning Committee’s decision in 2016 to refuse an application for two houses on the site and the Planning Inspector’s decision in 2017 to dismiss the owner’s appeal both place weight on the adverse visual impact of housing development on this site. • The land in question sits in a landscape that is particularly sensitive to development - on the fen edge and highly visible along Reach Lode and from the network of footpaths through recreational land belonging to the National Trust at Hurdle Hall and the 24 Acres. This sensitivity is identified in the independent landscape appraisal conducted by Alison Farmer Associates (AFA) in June 2020. AFA assessed that the area that includes this site “is sensitive to development within the wider fen landscape where it may undermine rural qualities or open expansiveness.... For these reasons development should be avoided in the vicinity of the Hythe and on the slopes leading to the rear of the village and conservation area”. <p>The above assessments and decisions were made by professionals who are experts in their fields and independent of the village. There is a consistent thread running through all of them, namely the protection of our sensitive fen-edge landscape and the Hythe which is historically and culturally at the heart, in all senses of the word, of our village.</p> <p>Furthermore:</p> <ul style="list-style-type: none"> • There are firm indications that the site is of archeological significance and forms a sizeable and integral part of the medieval port of Reach, today known as the Hythe. There has been limited excavation/investigation of the Hythe as a

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		<p>whole and of this site in particular. However, recent work notably ‘The case for reclassifying The Hythe, Reach, Cambridgeshire as a site of historic and archaeological significance’ (S Boreham, C Moseley & JA Boreham)¹ and the archeological evaluation of nearby land at 11 Chapel Lane(19/01439/FUL)² highlight the significance and scale of the archeology relating to the port of Reach and reveal that the port extended well beyond what today is called the Hythe. LIDAR data and historic maps suggest the presence of port channels to the side and through the site in question. The above mentioned paper concludes that the Hythe ‘probably comprises Medieval, Saxon and Roman remains, and protects an earlier peat sequence, makes it a pivotal and important East Anglian site. The land to the east of The Hythe is an artificial promontory, which was once bounded on two sides by navigable water courses and dock basins, and thus is of a similar level of archaeological interest’.</p> <ul style="list-style-type: none"> • When consulted as part of NP evidence-building, villagers were strongly in favour of protecting and improving the recreational, historical and environmental value of the Hythe. In the residents’ survey of February 2020, 80% of respondents (111 villagers) saw it as very important to 'minimise the effect of development' on the Hythe. Furthermore 90% of respondents (126 villagers) wanted Anglian Water to remove the redundant sewage works on the Hythe. <p>An argument that development of 16 Chapel Lane would meet local housing need has been examined by the NP Committee and the Parish Council and was considered to carry negligible weight. In 2021 ECDC set the housing requirement for Reach through to the 2030s at nil. Nonetheless the village has, rightly, seen modest housing growth in recent years and the draft NP endorses further modest growth elsewhere in the village, on sites better suited for development than this land.</p>
Steve Boreham	19/7/2023	<p>I am writing in support of the Reach Neighbourhood Plan.</p> <p>I have watched the plan develop from the beginning and have been partially involved in its conception.</p> <p>I believe that a chance to change the direction of development of a community such as this only comes along once in a generation.</p> <p>Reach village sorely needs clear and balanced guidance for the future that takes in to account the needs of everyone in the community, rather than just the views of a few influential people.</p>

¹ In Proceedings of the Cambridge Antiquarian Society October 2016

² In commenting on the evaluation, a member of Cambridgeshire County Council’s Historic Environment Team concluded ‘significant archaeological remains have been found including Post-medieval clunch walls, surfaces and pits as well as deep medieval deposits extending more than 1m below the ground surface. It is possible that these deep deposits relate to a basin off one of the infilled channels that once surrounded the hythe peninsula’

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		<p>Although my areas of expertise are principally water quality, biodiversity, space for wildlife, archaeology, heritage and geodiversity I see that the case for a cohesive plan that sets out infrastructure and housing development in Reach village is an overwhelming one.</p> <p>I believe that the Reach Neighbourhood Plan has been prepared to the highest standards and has involved extensive consultation with the community.</p> <p>A small number of individuals with vested interests have already attempted to prevent the plan getting to this stage. The ‘wolves’ are waiting in the wings and are intent on bringing this plan down.</p> <p>It is imperative that the merits of adopting the Reach Neighbourhood Plan are examined in a fair and balanced way, and the views of the whole community are taken into consideration.</p>
Nathan and Natasha Bridgeman	26/6/2023	Just a line to say our household support the Reach Neighbourhood Plan in its entirety.
Cambridgeshire County Council, Public Health Directorate	3/8/2023	<p>Thank you for consulting me on the Reach Neighbourhood Plan Consultation. The Plan has been compared to the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA) for Cambridgeshire³</p> <p>The JSNA contains an evidence review of the built environment’s impact on health and has distilled the evidence into the following themes:</p> <ul style="list-style-type: none"> • Generic evidence supporting the built environment’s impact on health. • Green space. • Developing sustainable communities. • Community design (to prevent injuries, crime, and to accommodate people with disabilities). • Connectivity and land use mix. • Communities that support healthy ageing. • House design and space. • Access to unhealthy/“Fast Food”. • Health inequality and the built environment.

³ <http://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/New-Housing-Developments-and-the-Built-Environment-JSNA-2015.pdf>

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		<p>The Plan has therefore been reviewed against these themes to ensure it addresses relevant impacts on health and wellbeing.</p> <p>Public Health specific comments on the Plan are as follows:</p> <p>Spatial Strategy POLICY RCH 1</p> <p>We welcome and support measures that protect green space, enhance a sense of local of community and improve health outcomes in all sizes of settlement and communities.</p> <p>Housing</p> <p>Due to the nature of Reach’s needs as a small settlement and community, and as identified in the Local Plan there is no requirement to identify future sites for development policy 2 supports the status quo.</p> <p>POLICY RCH3 - HOUSING MIX</p> <p>6.8 Given the relevant shortfall in three bedroomed houses, new development that provides such a home will be supported where it satisfies the other requirements of the Plan.</p> <p>From a Public Health perspective ensuring an appropriate mix of housing to suit needs of settlement is essential. Considerations re size and space minimums are important for any future development as reasonably sized properties are more affordable to heat and or cool therefore associated with better health outcomes.</p> <p>Any conversion of existing dwellings to alternate configurations of housing maybe appropriate to provide better life-time housing options for occupants. Changes must be of good quality; ensuring minimal noise transfer between dwellings and with adequate space provisions being adhered to. Having sufficient storage space, access to privacy, space for working from home needs, improved day light and ventilation are all essential to positive health outcomes.</p> <p>Qualitative studies have found that homes with improved thermal comfort reported: increase in usable indoor space; improvements in diet, privacy and household/family relationships. Although no clear evidence on health improvement, respondents made links to improvement in physical and mental health⁴</p> <p>Local Economy and Tourism</p> <p>POLICY RCH4 - NEW BUSINESSES AND EMPLOYMENT POLICY RCH5 - FARM DIVERSIFICATION</p> <p>These policies respond to economic development and tourism sensitively with consideration to the health of local residents.</p>

⁴ <http://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/New-Housing-Developments-and-the-Built-Environment-JSNA-2015.pdf>

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		<p>7.8 The inclusion in the Neighbourhood Plan of the following ideas for investigation are welcomed by Public Health as they promote active travel, sustainability, physical activity and enhanced social capital and sense community:</p> <ul style="list-style-type: none"> • Promote Reach as an isolated destination only accessible via sustainable modes of transport • Consider the creation of a car park for visitors outside of the village • Support the creation of community cafe /cycle hire (linked to cycle hire at Wicken Fen) • Consider establishing field centre/ environmental education programme and Youth Hostel linked to the National Trust • Provision of additional footpaths and/or signage to improve dispersal and reduce pressure. <p>The above considerations as reasonable and thoughtful solutions to be investigated as they support health and wellbeing while addressing village concerns.</p> <p>Natural Environment POLICY RCH6 - LANDSCAPE QUALITY POLICY RCH7 – GREEN INFRASTRUCTURE POLICY RCH8 – BIODIVERSITY POLICY RCH9 - LOCAL GREEN SPACES</p> <p>Public Health welcomes the enhancement of biodiversity through lane verges, hedgerows and trees. As well as improvements to the visual landscape by planting to screen pylons and Burwell Sub-station.</p> <p>The protection and enhancement of existing blue and green infrastructure is of significant value to human health. Policy 7 and the designated Local Green Spaces as identified on Map 7 and the Policies Map ensure this infrastructure is managed appropriately for human health.</p> <p>Provision of green space and infrastructure supports health through bringing with it co-benefits that occur when accessing it such as activity and social interaction. Protecting and enhancing biodiversity is critical to maintaining the green infrastructure of:</p> <p><i>Providing adequate green space can promote physical activity with the subsequent benefits of reducing overweight and promoting mental health⁵</i></p> <p><i>Also accessibility to green space for older people is beneficial as walkable green spaces near residences of older people aged 75+ significantly and positively influences five-year survival.⁶</i></p> <p>Historic Environment</p>

⁵ <http://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/New-Housing-Developments-and-the-Built-Environment-JSNA-2015.pdf>

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		<p>POLICY RCH10 – HERITAGE ASSETS POLICY RCH11 - BUILDINGS OF LOCAL SIGNIFICANCE Local Heritage assets are an important element of the architectural and historic make up of Reach. Policy 10 supports the maintenance of these assets for the benefit of the public realm. And in turn ensuring an attractive visual landscape all of which brings positive mental health benefits. Shared assets at community level may also help to encourage increased social cohesion and a greater sense of community as well as provide economic and tourism development opportunities for the community at large.</p> <p>Sustainable Development and Design POLICY RCH12 - DESIGN CONSIDERATIONS We welcome the use of design codes set out in 10.2 and reflected in policy 12 to facilitate balanced and sustainable development which meets the evolving needs of Reach. Protecting and enhancing the local character courtesy of design led development will maintain an agreeable public realm suitable for residents, maintain the interface of open space and settlement while ensuring a positive visual landscape to support and maintain mental wellbeing.</p> <p>POLICY RCH13 - MITIGATING THE RISK OF FLOODING FROM DEVELOPMENT Even though the risk of flooding from surface water is relatively low in the village centre. We welcome that development proposals should be designed to incorporate measures that will not add to or create surface water flowing.</p> <p>We support the use of SuDs and other mitigation approaches in new development to protect human health from flood risk. We welcome all flood risk management initiatives that can be incorporated into existing and future development. Residents who may be affected in flood prone areas, particularly vulnerable ones, could be encouraged to create/ join a flood group. These are typically lead by the Parish Council or by a nominated flood warden(s). Community action of this type supports community resilience and wellbeing thereby reducing physical and mental health impacts from severe weather. Completing personal flood plans and community flood plans also form part of this resiliency.</p> <p>POLICY RCH14 – SUSTAINABLE BUILDING Energy efficiency is a key factor in developing sustainable communities. Public Health welcome policy 14 which seeks to ensure opportunities are taken at the development stage to improve the environmental performance in development. Where feasible making use of design principles such as passive cooling, rainwater harvesting, solar collectors, maximising natural daylight etc. Also housing that is a reasonable size and affordable to heat is associated with positive health outcomes. With increasing summer temperatures another consideration is how to manage overheating in summer. Possible solutions include external shading, louvres/ shutters and solar control glass to alleviate excess solar gain. These varying design approaches to mitigate excess heat are more readily considered with new development but ought to be reviewed in retro fitting and conversions too.</p>

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		<p>COMMUNITY ACTION 2 – COMMUNITY ENERGY SCHEME POLICY RCH 15 – COMMUNITY ENERGY PROPOSALS</p> <p>We encourage the use of community energy schemes, which can help to make renewable energy more economically accessible to all and reduce risks of fuel poverty. As well as support idea of possible small scale community renewable energy generation and the stated criteria. However, as community heat networks need to be available to all, i.e. if there is a joining cost it can lead to health inequalities. The potential is those that cannot afford to join will not receive the benefit and will spend more on fuel. These individuals are likely already financially disadvantaged compared to others who can access the scheme. The Neighbourhood Plan is focused on sustainable development and should keep this potential concern at the forefront of any scheme development.</p> <p>POLICY RCH16 - DARK SKIES</p> <p>Public Health finds policy 16 beneficial - it seeks to ensure any environmental impact of light pollution is mitigated, however we suggest the use of renewable/solar lighting as needed. As acknowledged in the Neighbourhood Plan implementation must always be in the context of supporting human safety and wellbeing for example ensuring sufficient lighting year round for those using active travel after dark in green space and current or future travel routes/ parking areas. Ensuring that public spaces are safe especially for more vulnerable persons.</p> <p>Infrastructure and Services</p> <p>POLICY RCH17 - PROTECTING EXISTING SERVICES AND FACILITIES POLICY RCH18 - OPEN SPACE, SPORT AND RECREATION FACILITIES</p> <p>Due to Reach’s size the infrastructure and services are minimal however we support the objectives to retain what is present and encourage new provision. As well as maintain and improve highways provision.</p> <p>There is a clear association between the built environment and physical activity (1)⁷, where the physical characteristics of neighbourhoods are identified as having a positive impact on health, wellbeing, physical activity and walkability, these characteristics are: choice and diversity; well-kept environments; affordable and efficient public transport; safe and sociable play areas; the presence of greenspace; well-lit and pedestrian-friendly footpaths; and street patterns that provide opportunities for informal contact among residents⁸</p> <p>TRAVEL POLICY RCH19 - NEW VEHICLE-FREE ROUTES</p>

⁷ Board, Cambridge Sub-Region Housing. Housing Market Bulletin 27. 2015. 27

⁸ <http://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/New-Housing-Developments-and-the-Built-Environment-JSNA-2015.pdf>

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		Active travel is a key priority for Public Health. Well connected and attractive public places and streets encourage more people to move, exercise, make active travel choices and connect socially. Reach has a clear need to keep traffic density low due to a variety of identified factors in the neighbourhood plan and policy 19 supports this. An important consideration for active travel routes includes ensuring the surfacing is appropriate to the active users group e.g hard surfacing for pedestrian/ cyclist, soft for equestrian etc.
The Coal Authority	11/7/2023	<p>Thank you for your notification in respect of the above.</p> <p>It is noted that the East Cambridgeshire area does not lie on the coalfield. You can check if you LPA is on the coalfield via the link below</p> <p>Local planning authorities on the coalfield</p> <p>On the basis that the area does not lie on the coalfield the Planning team at the Coal Authority have no comments to make on the Neighbourhood Plan.</p> <p>The Coal Authority</p>
East Cambridgeshire District Council.	3/8/2023	<p>This letter sets out East Cambridgeshire District Council’s response to the submitted plan, which is being consulted upon between 22 June – 3 August 2023.</p> <p>The District Council welcomes the Parish Council bringing forward this Plan, and, broadly speaking, the Plan is considered to be well presented, with useful and engaging images and a generally easy to read writing style. This letter does not comment on all matters in the Plan, but rather concentrates on those matters which we believe should be brought to the attention of the Examiner (once appointed).</p> <p>Policy RCH 1 – Spatial Strategy</p> <p>The draft Reach Neighbourhood Plan proposes a new Development Envelope for Reach village, which, the Plan states at para. 5.3, “is based on that in the Local Plan but takes account of recent planning decisions and other changes in circumstances since the Local Plan was published”. The District Council is comfortable that a Neighbourhood Plan can adjust a development envelope as a matter of principle, and it raises no fundamental concerns with the adjustments as proposed in this specific Plan.</p> <p>The rest of Policy RCH 1 sets out the approach to development within and outside of the (as updated) development envelope, and the approach is broadly consistent with Policy GROWTH2 of the Local Plan, and therefore the District Council raises no objection to it.</p>

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		<p>Policy RCH 2 – Housing Development The Local Plan 2015’s locational strategy⁹ concentrates the vast majority of development in the market towns of Ely, Soham and Littleport. In addition, the Local Plan identifies a housing requirement for ‘villages’ and a rural windfall estimate. ECDC’s monitoring of housing completions and committed sites shows that the Local Plan’s housing ‘target’ for the villages and rural windfall has been exceeded. Consequently, there is no strategic requirement to make provision for further growth in the Reach Neighbourhood Area. ECDC therefore considers that policies RCH 1 and RCH 2, when taken together, make adequate provision for Reach Neighbourhood Area’s development needs over the plan period. Whilst the Single Issue Review (SIR) of the Local Plan is reaching its conclusion, there appears no reason why this conclusion would not remain valid should the SIR progress to adoption as proposed (including having taking account of the main modifications on the SIR as out for consultation at the point of writing this letter).</p> <p>Policy RCH 8 – Biodiversity At the Reg 14 consultation stage (June 2021), the District Council welcomed the introduction of this policy, though cautioned about its content / deliverability should the Environment Bill proceed.</p> <p>Matters have clearly moved on considerably since that Reg 14 consultation stage, with mandatory Biodiversity Net Gain (BNG) now set to commence from Nov 2023 (for major development) and April 2024 (minor development). The implementation of mandatory BNG will be via extensive government legislation and guidance. In this context, it is now considered inappropriate for a Neighbourhood Plan to repeat such requirements (or, worse, establish policy which has the potential to contradict legislation). As such, the District Council therefore recommends that Policy RCH 8 be scaled back considerably to just the last paragraph (with appropriate adjustment). For example, the following single paragraph may be suitable:</p> <p>“For applications which are exempt from mandatory biodiversity net gain, there is still an expectation that an element of biodiversity net gain should be incorporated into the proposal, such as bird boxes, insect ‘hotels’, bee blocks, bat boxes and/or hibernation holes. More extensive biodiversity gain would be welcomed.”</p> <p>If the above is accepted, then some adjustment to the supporting text is also necessary, though potentially this might be limited to the deletion of para 8.19.</p> <p>Policy RCH 9 – Local Green Space</p>

⁹ Local Plan 2015 policy GROWTH2

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		<p>The District Council notes the list of proposed LGS designations, and the helpful supporting document to justify them. The District Council agrees, in principle, that a Neighbourhood Plan can designated LGS sites, and it has no fundamental concern with any such proposed sites in this Plan.</p> <p>Policy RCH11 – Buildings of Local Significance Whilst this is not a matter of fundamental concern to the District Council, the opening paragraph of the policy appears in need of adjustment for clarity of what is intended. In particular, it is unclear what is meant (or how a decision maker should react) by the phrase “...must be appropriately secured”.</p> <p>Policy RCH14 – Sustainable Building The District Council, which has declared a climate emergency, strongly supports the intent of this policy. However, the District Council is concerned whether the policy, as written, is clear as to how a developer and decision maker should react to it. For example, the policy includes phrases such as ‘as appropriate’, ‘best practice’, ‘maximise / maximum’, and ‘incorporate current sustainable design and construction methods’, with very little explanation to define what such expectations are, or clarity as to whether a development proposal would ‘pass’ or ‘fail’ such requirements.</p> <p>The District Council therefore suggests the following adjusted policy, which seeks to retain the intent of the current policy and much of the same wording, but enhances the policy so it is clearer how the policy should be implemented:</p> <p>For all appropriate development, pProposals that incorporate current the latest best practice in energy conservation will be supported where provided such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings.</p> <p><u>Unless covered by an exception as defined below</u>, development proposals should, as appropriate:</p> <ol style="list-style-type: none"> a. maximise the benefits of solar gain in site layouts and orientation of buildings, <u>whilst avoiding overheating during summer months;</u> b. incorporate best practice in energy conservation, be designed to achieve maximum achievable energy efficiency <u>be designed with a ‘fabric first’ approach to construction, incorporating a high degree of thermal energy efficiency, and, for dwellings, targeting a space heating demand of around 15-20kWh/M2/yr;</u> c. avoid <u>have no direct</u> fossil fuel-based heating systems; d. incorporate current sustainable design and construction measures and energy efficiency measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems <u>generate at least some on-site (and preferably on-plot) renewable energy, but target, where possible, generating enough energy from renewable</u>

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		<p><u>sources on-site (and preferably on-plot) to meet reasonable estimates of all regulated and unregulated total annual energy demand across the year; and</u></p> <ul style="list-style-type: none"> e. make provision for grey water/rainwater, and/or surface water harvesting and recycling, <u>which, as a minimum, means the provision of at least one appropriately sized water butt for external garden use; and</u> f. <u>Include an Energy Statement setting out how the above measures (a)-(e) have been incorporated in the development proposals.</u> <p><u>Where, on an exceptional basis, the above points cannot be met for technical (e.g. overshadowing) or other policy reasons (e.g. heritage), then the Energy Statement must demonstrate both why they cannot be met and the degree to which each of the points are proposed to be met.</u></p> <p>Development proposals on <u>peat-based</u> fen soils should consider and offset the carbon losses associated with building through the incorporation of commensurate carbon offsetting measures.</p> <p>If the Examiner is minded to reject both the submitted policy and the suggested policy above, then the District Council respectfully asks the Examiner to give the Parish Council an opportunity to further refine the policy. The District Council would be very happy to assist in any such refinement.</p> <p><i>Conformity with strategic policies</i> As a general comment, the Neighbourhood Plan policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 and national policy. The District Council is therefore satisfied that the draft Neighbourhood Plan does not undermine its strategic policies and is capable of meeting the requirement for ‘general conformity’.</p> <p><i>Other obligations</i> As set out in Submission Document 4, the District Council issued a Determination Statement in August 2021 that concluded that the District Council considers that no likely significant environmental effects will arise from implementation of the Reach Neighbourhood Plan, as drafted at the Regulation 14 stage.</p> <p>Having reviewed the Submission version of the Neighbourhood Plan, the policy intent and content are very similar to the earlier Regulation 14 Plan, and the District Council sees no reason why the conclusions set out in the Statement issued in August 2021 do not remain valid.</p>

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		<p>In conclusion, ECDC considers that the Reach Neighbourhood Plan is capable of satisfying the basic conditions and other relevant legal obligations.</p>
<p>Environment Agency</p>	<p>24/7/2023</p>	<p>Thank you for consulting us on the Draft Neighbourhood Plan for Reach.</p> <p>We aim to reduce flood risk and protect and enhance the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. Based on the environmental constraints within the development envelope, we have no detailed comments to make in relation to your Plan at this stage.</p> <p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning</p> <p>The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces.</p> <p>We have no comment to make on the SEA Screening Report.</p> <p>We hope this is of assistance. If you have any queries, please do not hesitate to contact us.</p>
<p>Claire Halpin (please also see Appendix 1 and Appendix 2 of this report for maps referred to in this representation)</p>	<p>2/8/2023</p>	<p>Letter of Objection</p> <p>We are writing on behalf of Mrs Claire Halpin, of No 16 Chapel Lane, Reach, to respond to the final public consultation of the draft Reach Neighbourhood Plan (“RNP”). We wish to draw your attention to serious shortfalls in the consultation process and errors in the production of the RNP.</p> <p>Mrs Halpin objects to the proposed removal of part of her property from the Development Envelope (“Envelope”). It is our submission that a fundamental mistake has been made, which it is paramount to address, if this RNP is to succeed and become adopted.</p>

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		<p>We set out in this letter an analysis of which parts of the RNP submission are errant and the change we require to be made by you, before the RNP is sent to the Inspector for Examination. This letter is divided into sections referencing the relevant document and the corresponding paragraph with which we do not agree. Where appropriate a suggested change is made.</p> <p>1. Introduction</p> <p>Mrs Halpin made representations on the removal of part of her property from the Envelope to the Neighbourhood Plan Project Group (“Project Group”) in the RNP’s initial development stages. She then made a representation as part of the formal Pre-Submission consultation process (“Halpin representation”), echoed by 11 other respondents. With her submission, Mrs Halpin enclosed a petition (“Petition”) with 88 signatures of support. In a village with less than 300 people on the electoral register, this is a significant endorsement from the local community. Thereafter she continued to make representations on the removal of part of her property from the Envelope to the Project Group and to Reach Parish Council in the RNP’s ongoing development and decision-making stages.</p> <p>Despite her active participation in all stages of the consultation process, and demonstrable support for her case, her voice and the voices of local residents have been ignored, seemingly wilfully and without any justification at all.</p> <p>The re-drawing of a development envelope is significant and is usually addressed as part of a review of the Local Plan. Here, it is being done through the Neighbourhood Plan process, but it has been revised without due transparency and consultation. Inadequate consultation is in direct contravention of the now well-established law and guidance associated with the production of Neighbourhood Plans.</p> <p>In summary, the responses to the Pre-Submission Consultation survey were not made available to those outside the Project Group until a year after the consultation closed, despite important decisions being taken in the interim.</p> <p>Similarly, changes to the Envelope were not presented in a transparent manner. The current Envelope, from the adopted Local Plan 2015, was not displayed alongside the proposed Envelope in the Consultation documents, obstructing a clear assessment of the changes. For ease of reference, we attach the proposed Envelope, Map 4 on p.16 of the RNP, which we have reproduced and annotated to show the desired area for reinstatement (Appendix 1¹⁰) and the current Envelope, which includes the entirety of Claire Halpin’s property, from the 2015 adopted East Cambridgeshire Local Plan (Appendix 2)¹¹.</p>

¹⁰ This appendix is provided as Appendix 1 to this document also.

¹¹ This appendix is provided as Appendix 2 to this document also.

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		<p>We consider that revising the Envelope to exclude part of No 16 Chapel Lane, on the grounds of a planning appeal decision, is unjustified given the design specific nature of any planning application, and that application in particular. Visual and setting impacts of this land either being in or outside of the Envelope cannot accurately be assessed on this basis and have not been adequately assessed as part of the Neighbourhood Plan process in relation to this land.</p> <p>2. Consultation process</p> <p>2.1 Notice of Public Consultation</p> <p>2.1.1 We note the deadline for submission of consultation responses. We would question, given the seriousness of the shortcomings whether this consultation needs to be extended, or the plan sent back to the Project Group for redrafting and re-consultation.</p> <p>2.2 Consultation Statement – March 2023</p> <p>2.2.1 We note that this is a very large document, seemingly very thorough in its production. However, there are serious shortcomings in the way consultation has been approached and conducted. The plan is unsound unless the issues we raise are addressed.</p> <p>2.2.2 We object to the lack of availability of critical baseline information, not only for residents but, crucially, also for members of the Parish Council.</p> <p>2.2.3 Namely, in July 2021 residents were invited to comment on the PreSubmission RNP. 12 comments, in total, were submitted as part of this consultation in support of a reinstatement of No 16 Chapel Lane to the Envelope. Just 3 comments did not support reinstatement. In addition, 88 residents signed the Petition circulated by Claire Halpin signalling their support.</p> <p>2.2.4 However, publication of the results of the 2021 survey were only made available in July 2022, one year later. The results were not available to the Parish Council when it voted on the proposed Envelope in December 2021. This is clearly totally unacceptable in any democratic process, and certainly not regarding the production of part of the Development Plan.</p> <p>2.2.5 We specifically comment on the paragraphs of the Consultation Statement as follows:</p> <p>Page 3 paragraph 1.2</p>

Name	Date Received	Comments
		<p>This is an incorrect assertion. This document does not accurately: explain how people were consulted; summarise the main issues and concerns raised by the persons consulted; and describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood plan.</p> <p>Page 3 paragraph 1.3</p> <p>This statement is not true. The engagement with the community has not been extensive and responses to the consultation have been wilfully ignored.</p> <p>Page 7 paragraph 5.1</p> <p>This list is not an accurate reflection of the number of respondents. Claire Halpin submitted with her representation a Petition with 88 signatures.</p> <p>Page 7 paragraph 5.2</p> <p>We object to the phrase ‘appropriately amended’. It is our contention that the Envelope was not amended to include No 16 Chapel Lane despite support for this in comments from respondents.</p> <p>Page 32 Appendix 5</p> <p>We object to the lack of weight given to the Halpin representation, as well as the regard for 11 other respondents who asked for the reinstatement of No 16 Chapel Lane.</p> <p>Page 32 Appendix 5</p> <p>We object to the Parish Council’s response to all respondents asking for a reinstatement of No 16 Chapel Lane to the Envelope: “The area that has been removed was refused planning permission for two dwellings in 2016 and a subsequent appeal to the Secretary of State was dismissed in 2017 due to it being contrary to policies in the adopted Local plan and the National Planning Policy Framework. In particular it was considered by the Planning Inspector that development would ‘harm the views into the settlement and its intrinsic natural setting.’ It is unjustified to revise the Envelope on the grounds of a planning appeal decision which is design specific. The Inspector’s findings were in relation to that proposal only. It is not acceptable or appropriate to alter the Envelope, ignoring consultation responses, on that basis.</p>

Name	Date Received	Comments
		<p>Page 34 Appendix 5</p> <p>We object to ECDC’s support for revising the Envelope via the Neighbourhood Plan process, without due regard to the consultation process. There has been inadequate and flawed consultation and it is clear that the proposed (revised) Envelope does not have the support of local people.</p> <p>Page 82 Appendix 5</p> <p>We object to zero weight given to the Petition, which was ignored, despite being noted as ‘received’.</p> <p>Page 96 Appendix 5</p> <p>We object to zero weight being given to the Petition, circulated by Claire Halpin and submitted alongside the Halpin representation. The Petition is an accurate reflection of public opinion and a discontent with the proposed Envelope, which has the potential to derail the adoption process. In addition to the 88 signatures, an additional 12 comments were submitted as part of the June 2021 consultation in support of the change and there was a total of 27 comments about the Envelope.</p> <p>Page 104 paragraphs 3.2.4 & 3.3.1</p> <p>There has been a great deal said about protecting the views towards the village from The Hythe. There is already a natural, dense boundary between the property and The Hythe. This is illustrated by the inclusion of two photographs in the Halpin representation. As also stated here, if development were permitted at No 16 Chapel Lane at some point in the future, a single storey building (for example) would not intrude on the identified Important View.</p> <p>Pages 110, 114, 117 Appendix 6</p> <p>We object to an inconsistent approach in applying weight to the consultation responses of local residents. Given the level of support as outlined above, we are surprised that a modification has not been included in the Proposed Modifications to the Neighbourhood Plan, with a corresponding amendment to the Envelope. There is an inconsistency of approach and complete lack of justification as to why the views of local residents have been completely ignored. Table shows modifications made. When cross-</p>

Name	Date Received	Comments
		<p>referenced with the number of Pre-Submission consultation comments in Appendix 5: Plot 2 Hill Farm – modification made in response to 2 comments (pages 29&30). Little Back Lane – modification made in response to 2 comments (pages 29&30). No 16 Chapel Lane – 12 comments made. No modification made (pages 30-36).</p> <p>3. Planning policy</p> <p>3.1 A rejected planning application at appeal, visual and setting impacts are cited as reasons for the removal of No 16 Chapel Lane from the Envelope. 3.2 We strongly challenge this approach. Not only are planning permissions design specific, but there are numerous examples throughout the RNP of an inconsistent approach to visual and setting impacts. There has been an enlargement of the Envelope into gardens and in the line of Important Views. The sole retraction of the Envelope has been at No 16 Chapel Lane.</p> <p>3.3 Reach Neighbourhood Plan (submission version) May 2023</p> <p>Page 4 paragraph 1.7</p> <p>We do not believe that the RNP represents the ‘aspirations of the residents of Reach.’ Due regard has not been given to Pre-Submission Consultation responses.</p> <p>Page 11 paragraph 2.13</p> <p>Given the weight that has been given to the results of the May 2020 Residents’ Survey to inform the RNP, it is not acceptable that it is not included as part of the submission documents. The survey is available at: http://www.reach-village.co.uk/neighbourhood_plan.html. Of particular note is Q.11. The comments show a general concern for inconsistency when making development decisions against the Envelope. It also demonstrates an appetite for a carefully expanded Envelope. The comments submitted by residents provide valuable additional information. An over-reliance has been placed, throughout the RNP, on the headline percentages without due reference to the accompanying free-text comments.</p>

Name	Date Received	Comments																				
		<div data-bbox="577 225 1626 619"> <p>11. Location of land for housing. Do you think that we should allow development:</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Response Percent</th> <th>Response Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Only within the development envelope?</td> <td>44.19%</td> <td>57</td> </tr> <tr> <td>2</td> <td>Within a carefully expanded development envelope?</td> <td>55.81%</td> <td>72</td> </tr> <tr> <td colspan="2"></td> <td>answered</td> <td>129</td> </tr> <tr> <td colspan="2"></td> <td>skipped</td> <td>17</td> </tr> </tbody> </table> </div> <div data-bbox="577 635 1626 1198"> <p>Comments: (14)</p> <ol style="list-style-type: none"> 1 Depending on where it is. 2 The current development envelope has absolutely not served the village reasonably well. The envelope as shown has been breached on a number of occasions with the agreement of ECDC. It does not reflect the built environment. 3 As long as it didn't upset the balance of the village or wildlife 4 Though it depends how far any expansion of the development envelope might reach. 5 This plan does not show the envelope relation to built environment and is misleading 6 The current envelope excludes 20+ houses who (sic) are in Reach so needs redoing. 7 This envelope is irrelevant as 20+ Reach houses are already existing and not within the envelope. Taking the real envelope being where current houses are. 8 Only because developments have already taken place /been given permission outside the envelope. 9 Respondent's own box 'within reasonable boundaries' 10 Outside development envelope only by exception (but possible in the right circumstances) 11 Respondent states that salient of the development envelope alongside the Hythe needs to come out of envelope 12 Respondent highlights gardens of the Manor House and Red Bar and land on either side of Burwell Road down to Churchfield Farm, presumably as suitable for an expanded envelope 13 Respondent has created a tick box marked 'Within a larger envelope' 14 We have very limited infrastructure to accommodate more. </div> <p>Page 13 paragraph 3.3</p> <p>We regret that a re-drawing of the Envelope has been carried out by the Project Group, rather than through the Local Plan process. There has been a lack of due consultation and a wilful ignoring of the responses received.</p>			Response Percent	Response Total	1	Only within the development envelope?	44.19%	57	2	Within a carefully expanded development envelope?	55.81%	72			answered	129			skipped	17
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Name	Date Received	Comments
		<p>Page 16 paragraph 5.3</p> <p>We object to the failure to display the current and proposed Envelopes alongside each other in the Consultation document. This paragraph explains the Development Envelope and is important. Without clear baseline information however, an endorsement of the proposed Envelope is clearly open to challenge. It is a decision failing to take into account material information and is unreasonable in the “Wednesbury” line of case law.</p> <p>Policies Map April 2015 (current Envelope) should be set alongside Map 4.</p> <p>(https://www.eastcambs.gov.uk/sites/default/files/8_33_Reach_J.L.pdf)</p> <p>The summary: ‘It is based on that in the Local Plan but takes account of recent planning decisions and other changes in circumstances since the Local Plan was published’ is not representative of the differences between the plans.</p> <p>There has been development outside the Envelope and the Envelope has been expanded. The changes made are hard to ascertain without the two maps, even to the well-trained eye. It is very challenging indeed for the general public to be able to “spot the difference” if the original/existing Envelope which forms the adopted Local Plan is not provided.</p> <p>Page 17 paragraph 5.5 & RCH1</p> <p>We object to an Envelope re-drawn on the basis of a rejected planning application on this site.</p> <p>It seems likely that exceptions to development outside the Envelope are likely to be severely restrained: ‘strictly limited to that which it can be demonstrated is essential for the operation of utilities infrastructure, existing businesses, agriculture, horticulture, forestry, outdoor recreation and other uses that need to be located in the countryside.’</p> <p>For this reason, it is even more important that No 16 Chapel Lane is reinserted within the Envelope. The application for a two-storey dwelling was refused on landscape grounds. However, a single storey dwelling would have very little landscape impact (see Halpin Representation).</p> <p>Development at a future point, to meet the future needs of the village should not be excluded.</p> <p>Page 19 paragraph 6.4 & RCH2</p>

Name	Date Received	Comments
		<p>Although there is no housing target for Reach imposed by the Local Plan, a strategic approach to organic, future growth would be welcomed. Changes to the Envelope seem to have been reactive – in response to current planning permissions.</p> <p>Page 24 paragraph 8.7 We object to landscape impact and intrusion on Important Views as grounds for re-drawing the Envelope to exclude No 16 Chapel Lane</p> <p>Landscape Appraisal Management Guidelines: ‘Undertake research and conservation work at The Hythe and consider the suitability of pursuing an extension to the existing Conservation Area boundary. Given this area’s historic significance and the lack of encroachment from development within the village, consideration should also be given to the refinement of the Settlement Boundary (Development Envelope) as set out in the Local Plan in order to exclude land which forms an immediate setting.’</p> <p>This feels targeted at No 16 Chapel Lane. We would argue that the land excluded from the Envelope does not fall within the immediate setting of The Hythe.</p> <p>The archaeological importance of The Hythe has been greatly overstated. As part of the No 16 Chapel Lane 2016 planning application, three consultation responses were received from three different members of the Cambridgeshire County Council (“CCC”) Historic Environment Team including their most senior officers. CCC stated that the property had archaeological potential but was satisfied that it could be dealt with by a Planning Condition and the planning refusal did not raise concerns relating to archaeology.</p> <p>Furthermore, the integrity of the area has been damaged by the existing Sewage Works built on the Hythe.</p> <p>Page 25 paragraph 8.9</p> <p>We object to an inconsistency in approach with regard to views: Appraisal of Important Views. Despite the Plan stating that development which has a detrimental impact on the key features of views will not generally be supported, some of the Important Views look back onto approved planning sites.</p> <p>Page 26 paragraph 8.10 & RCH6</p> <p>We object to a removal from the Envelope on grounds of visual impact.</p>

Name	Date Received	Comments
		<p>‘It also abuts the northern, western, eastern edges of Reach’s development envelope such that the visual impact of any proposed development in these areas needs particular scrutiny.’</p> <p>The Local Plan Envelope includes No 16 Chapel Lane. We question whether it is appropriate for a Neighbourhood Plan to overrule this, particularly in this manner – a transparent consultation on amendments to the Envelope has not been conducted. Particularly, when there is clear local support for the inclusion of No 16 Chapel Lane, demonstrated by the Petition.</p> <p>Page 38 RCH12</p> <p>We object to inconsistencies of approach when re-drawing the Envelope.</p> <p>Design Considerations ‘b) do not involve loss of gardens’.</p> <p>This is in contrast to Housing Development policy, RCH2, which favours infill and approved planning permissions include expansion of the Envelope into gardens.</p> <p>Page 47 Inset Map</p> <p>We object to inconsistencies of approach when re-drawing the Envelope. When compared with the April 2015 Envelope, new buildings outside the 2015 Envelope have been permitted, even in the Conservation Area.</p> <p>4. Landscape Appraisal May 2020</p> <p>Page 21 paragraph 4.4.2</p> <p>We object to the removal of No 16 Chapel Lane on the grounds of intrusion on important views. There is an inconsistency of approach.</p> <p>Page 28 LCA 2</p> <p>South of Burwell Road. Sensitivity/Capacity: ‘New development should not extend further than the existing building line to the north to avoid extending the village to the northwest.’ We object to this. It is not in keeping with the local opinion, which</p>

Name	Date Received	Comments
		<p>overwhelmingly supports keeping the Envelope as it stands with regard to the northwest, namely inclusion of No 16 Chapel Lane. It is also not justified in planning terms as there is insufficient evidence to back this up. This change has not been properly or adequately consulted upon and the responses to this have been ignored.</p> <p>Page 34 paragraph 6.2</p> <p>We object to the removal of the garden of No 16 Chapel Lane on the grounds that it intrudes on the setting of The Hythe.</p> <p>“Changes to avoid: Development within the setting of important heritage assets including Devil’s Dyke and The Hythe which undermines the landscape setting and historic significance.”</p> <p>We would contend that 16 Chapel Lane is not within the immediate setting of The Hythe. A dense hedge line separates them. Furthermore, The Hythe is not within the Conservation Area and has Sewage Works sited on it.</p> <p>5. Reach Design Code May 2020</p> <p>Page 22 paragraph 3.4</p> <p>We dispute that the inclusion of No 16 Chapel Lane in the Envelope would intrude on future plans to make a larger green space at The Hythe.</p> <p>If there is an ambition to make a larger green space at The Hythe once/if the sewage works are removed, there is natural screening already in place between No 16 Chapel Lane and The Hythe.</p> <p>‘the option to remove the redundant sewage plant from the site of The Hythe is strongly supported by villagers, as indicated in the 2020 residents’ survey’.</p> <p>In the survey, comments raised the question as to whether it is indeed redundant, with residents speaking about the presence of raw sewage, suggesting this is a long-term ambition rather than an aspiration in the short term. In any event, removing this land from the Envelope does not further this aim.</p> <p>6. Conclusion regarding the submission of the RNP</p>

Name	Date Received	Comments
		<p>6.1 In summary, we consider that there has been an abject failure to reflect residents' comments submitted as part of the formal consultation process, inadequacies in the baseline information provided to parish councillors and residents, and inconsistent application of planning policies.</p> <p>6.2 The consultation has been inadequate, and representations have been wilfully ignored. As a result, the Envelope has been re-drawn without adequate justification.</p> <p>6.3 Given the views of the village that have already been expressed – and ignored – the RNP is at a grave risk of failure at the Referendum stage.</p> <p>6.4 It is our view that these procedural and policy failings render the RNP, in its current form, unsound. Without modification, the RNP has not been produced in accordance with law and policy. It has failed to take into account material considerations and its production is unreasonable. The RNP's validity in its current form is vulnerable to challenge by Judicial Review.</p> <p>6.5 It is our submission that the Envelope, with regard to No 16 Chapel Lane, should be redrawn to match the Envelope set out in the current Local Plan (2015). This would be a small change, but there is insufficient justification for its removal. Neighbourhood plans are a tool for the local community to shape the places in which they live and work – it is paramount that the RNP reflects the voices of the people who live in Reach.</p> <p>6.6 We look forward to hearing from you with regards to this matter but respectfully request the Envelope is amended back to its previous boundaries with regard to No 16 Chapel Lane.</p>
Historic England	31/7/2023	<p>Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle but, owing to staff vacancies, we do not currently have capacity to provide detailed comments.</p> <p>We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.</p> <p>Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p>

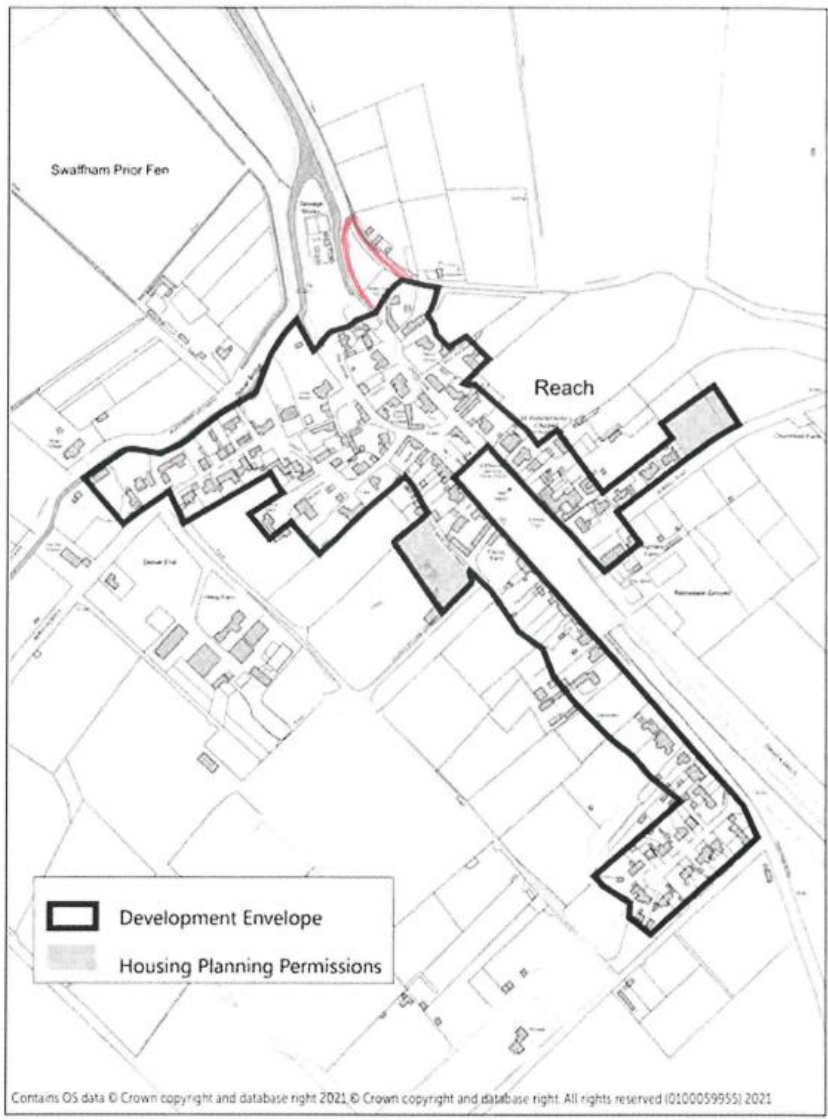
Name	Date Received	Comments
		<p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p> <p>Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.</p>
Isleham Parish Council	17/7/2023	Isleham Parish Council have no objections to the above plan and wish Reach Parish Council every success in its implementation.
Charles Moseley	3/7/2023	<p>I write as someone who has lived in this village for 60 years.</p> <p>The Neighbourhood Plan has been constructed with conspicuous care and openness, and the number of residents responding to questionnaires has been unusually high. There is a very high level of consensus about preserving the special nature of this remarkable village, not the least factor in which is its visual amenity both in landscape and in the built environment. A few people, led by one vociferous resident, have however fomented controversy, with a distressing (and hardly necessary) amount of ad hominem argument, over the line of the development envelope. That orchestrator of the controversy has a clear personal interest. This has to be seen against this background of very substantial support for the Plan.</p> <p>In my view, a neighbourhood plan by its very nature acknowledges a duty not only to the present and present inhabitants but also to those who will come after us and whom we shall never know. That is quite some responsibility. Had that thinking been more general in the 1960s, the village would not have lost nearly half of the beautiful, flower-rich, biodiverse Hythe to the appalling development of the sewage plant, which now is redundant. That eyesore, despite the welcome camouflaging by now mature trees, is memorial to the shortsightedness and lack of vision of the PC and RDC of the time.</p> <p>There is a powerful case for seeing what is left of the Hythe and its environs - which extend past North End House along the old driveway to Burwell and in the other direction as far as Water Hall - as historically important. That case has been argued in a 2016 paper, Boreham, S, Boreham, J, and Moseley, C.W.R.D.: 'The Case for Reclassifying the Hythe, Reach, Cambridgeshire as a site of historic and archaeological significance', Proceedings of the Cambridge Antiquarian Society, (2016), pp. 61-4, which has provoked a good deal of continuing discussion, some of which may find its way into a further paper or papers. Moreover, that area is also visually important. The Development Envelope as set out in the Draft Plan of July 2021 recognises both those issues, and I would urge the Council to vote in favour of the draft as it stands as a declaration of policy and intent.</p>

Name	Date Received	Comments
		<p>Finally, it perhaps should be mentioned that no Development Plan, once agreed by the District Council, wholly precludes specific activity outside a development envelope. There have been cases, here and elsewhere, where permission to build has been granted by the District Council despite the site being outside an existing designated boundary. Each case has to be considered, and stringently judged, on its merits and compatibility with the ethos and overall intent of any neighbourhood plan.</p>
National Highways	5/7/2023	<p>Thank you for consulting National Highways on the abovementioned Neighbourhood Plan.</p> <p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
Natural England	2/8/2023	<p>Thank you for your consultation on the above dated 22 June 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the Reach Neighbourhood Plan.</p>

Name	Date Received	Comments
Norfolk County Council Growth and Infrastructure Community and Environmental Services	26/6/2023	Thank you for consulting Norfolk County Council on this Neighbourhood Plan. The County Council has no comments to make.
David Parr	3/8/2023	<p>1. Some good work has been done by the NPPG but the area that has been hugely mishandled is regarding the Development Envelope (“DE”).</p> <p>2. On page 16 of the Reach Neighbourhood Plan Pre-submission Consultation Version (RNPPSCV”) there is a diagram entitled Map 4: Development Envelope. This is not the DE, it is the Proposed Development Envelope (“PDE”). The Inset Map on page 47 uses the same PDE with “Crown copyright and database right 2021 etc” as a subtitle which is further confusing. On page 46 we see again the term DE used when what is shown is the PDE.</p> <p>3. The two Development Envelopes should have been colour-coded and overlaid and each change should have been numbered and in the text, each should have had an explanation. In the Consultation Document the question should have been asked “do you support this change? “Yes”, “No” or “No Opinion”. If this had been done, all the subsequent problems would have been avoided since the NPPG would have been able to see whether or not it had a mandate to proceed with its proposed change regarding 16 Chapel Lane.</p> <p>4. This mishandling with regard to planning policy, which the NPPG would have known is a hugely sensitive area, is inexcusable and it led to the owner of 16 Chapel Lane (whose property is negatively affected in the PDE and who was at no stage contacted by the NPPG prior to publication of the RNPPSCV) having to produce a petition which stated: REGARDING NORTH VIEW HOUSE, 16 CHAPEL LANE, REACH. We the undersigned want the Development Envelope contained within the Reach Neighbourhood Plan to be that depicted in the map titled Policies Map (April 2015) Reach (Insert Map 8.33) which is incorporated within the East Cambridge District Council Local Plan Adopted 2015, and not the Development Envelope as depicted in the Reach Neighbourhood Plan, Pre-Submission Consultation Version (dated June 2021). This petition gained 88 signatures in a village that has less than 300 people on the electoral register.</p> <p>5. The owner of 16 Chapel Lane included the petition in her response to the RNPPSCV and in addition there were 13 comments made by villagers, but the NPPG decided to make no changes to the draft NP. On the web page, provided by the Chair of the RNPC,</p>

Name	Date Received	Comments
		<p>it states that “Ultimately an NP for Reach will only succeed if it reflects what the majority of villagers want, feel comfortable with and crucially, are prepared to vote for”.</p> <p>The draft NP as it stands, as evidenced by the petition and the responses, undoubtedly does not fulfil this success criteria and it should be amended accordingly by reinstating the garden of 16 Chapel Lane into the PDE.</p>
Bryan Pearson	3/8/2023	<p>Much of the scheme is very good, but equally it doesn’t need an NP to adopt and nurture a range of conservation ideas and plans. We can do these anytime.</p> <p>But (as an ex Parish Councillor) I am very concerned about a) the impact the planning aspects will have on our local democracy; and b) I also have serious concerns about some dubious decision making in the process of preparing and drafting the draft document.</p> <p>Local democracy</p> <p>Reach is a very small community, where by definition, a much higher percentage of people know each other than in larger communities. It makes planning issues very difficult, and often personal. Defining when declarations of interest should be made, becomes greyer and greyer.</p> <p>We now have only four (of seven) Parish Councillors, with unprecedented turnover in the last three years. I moved here over 30 years ago, and in the past we always had a full compliment of councillors. But now few people are prepared to devote time to serving their community. From village conversation, I am convinced that this is because people do not wish to be placed in the invidious position of seeming to ‘rule’ on their close neighbours planning applications.</p> <p>I therefore object to the draft plan, as I believe it will have an adverse impact on the strength of our local democracy. Planning issues are much better formally dealt with by ECDC. Perhaps I should also add that i am surprised that the Plan doesn’t actually have any plans for the growth of the village beyond the current envelope. I’m not sure that in an era of significant national housing shortfall, any community has the right to try and claim that it is too special to take on any growth whatsoever. What we have could be perceived as the very definition of a NIMBY NP.</p> <p>Dubious decision making</p> <p>A few years ago I was one of the leaders of a community group that successfully opposed a planning application down on the Hythe. The application was refused by ECDC, and again on Appeal. To now see an element of this community group coalescing (under the umbrella of the unelected NP Committee) to alter the village envelope with the removal of the land that had been the subject of this planning application, leaves me feeling very uneasy. Had the community been invited to a NP Committee Meeting</p>

Name	Date Received	Comments
		<p>that was going to discuss the village envelope, there would have been a significant turnout. We weren't invited. Had there been proper before and after maps in the initial draft showing proposed changes to the envelope, there would have been significant comment. Had the then NP chair provided an honest answer to parish councillors when asked about responses to the questionnaire sent out (which extraordinarily had been hidden from view for over a year), it is very likely the PC would not have approved the document. The list could go on. It was undemocratic, unsatisfactory, and unedifying. A subsequent petition objecting to the change in the village envelope was signed by nearly 100 residents (including five ex PC chairs) but it was ruled inadmissible by the incumbent PC chair on grounds that it was only accepting responses to the questionnaire (a 'fact' that was not stated anywhere).</p> <p>It should not be allowed to stand.</p> <p>Thank you for your attention</p>
Dafila Scott and Tim Clutton-Brock	3/8/2023	<p>We are writing to support the Reach Neighbourhood Plan which has been submitted to you. The people in Reach who drew it up, with the help of outside professionals, took great care to make sure they based their decisions on the best evidence available.</p> <p>The outcome is a well thought out Neighbourhood Plan and we, like many other villagers, support it in full.</p>
Andrew Trump	6/7/2023	<p>I am writing to support the excellent neighbourhood plan produced by the group in Reach. There has been some vocal opposition within the village which I am sure will be contacting you and I didn't want you to get an impression that there is no support for the proposed neighbourhood plan. Whilst I support the plan I am technically outside the parish and so won't be eligible to vote in the referendum.</p>
Robert Wood	2/8/2023	<p>Thank you for the email below and being invited to provide comments on the Reach Neighbourhood Plan (Submission Version), I only have a few brief comments as detailed below.</p> <p>I am very happy with this version of the Reach Neighbourhood Plan which has been submitted to East Cambridgeshire District Council, I would like to thank the Reach Parish Council for progressing this Neighbourhood Plan and the team of Reach villages and parish counsellors who have worked so hard to get the Reach Neighbourhood Plan to this stage.</p> <p>Having been born in the village and live here most of my life, I am very happy that this version of the Reach Neighbourhood Plan will safe guard the village of Reach for future generations.</p> <p>To confirm, I am very satisfied with this version of the Reach Neighbourhood Plan.</p>



Map 4: Development Envelope

