



WITCHFORD Neighbourhood Plan

CONSULTATION STATEMENT

SUBMISSION VERSION OCTOBER 2019

Witchford Neighbourhood Plan Consultation Statement October 2019

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1. Introduction

1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012. Accordingly, this Consultation Statement contains the following information:

- details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan (hereinafter the 'Witchford Neighbourhood Plan')
- an explanation as to how they were consulted
- a summary of the main issues and concerns raised by the persons consulted; and
- a description as to how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan (hereinafter the 'Witchford Neighbourhood Plan').

1.2 Community and stakeholder engagement has been an integral part of the Neighbourhood Plan making process. The consultation activity can however be broken down in four key stages as follows:

Stage	Description	Time period
1	Inception – Neighbourhood Plan Committee and steering group established	December 2015 – September 2016
2	Initial plan development including evidence gathering and consultation	October 2016 – July 2017
3	Advanced Plan development	August 2017 – May 2019
4	Regulation 14 pre-submission consultation	12 th June – 25 th July 2019

1.3 This consultation statement provides an overview of the activity which took place at each of these stages.

2. General overview of approach to consultation

2.1 The Witchford Neighbourhood Plan has been developed for the community by the community. In January 2016 Witchford Parish Council set up a free-standing Neighbourhood Plan Committee (which sat until April 2019) to oversee the production of the Plan, while the day-to-day detailed work was carried out by a steering group of residents assisted by a professional planning consultant. The Parish Council resumed responsibility for the Neighbourhood Plan in May 2019 before the Regulation 14 Consultation.

2.2 In preparing the Witchford Neighbourhood Plan the Neighbourhood Plan Committee has endeavoured to keep residents and other stakeholders informed of the plan making process, and to encourage participation as widely as possible.

2.3 Early on in the process, a separate page on the Parish Council website was set up to host the Neighbourhood Plan news, consultation survey results, evidence documents, the draft text as well as the Regulation 14 version draft of the Witchford Neighbourhood Plan. In order to encourage public participation, the Neighbourhood Plan Committee ran as an open meeting so that the public could fully partake in discussions. All meeting Agendas and Minutes are published on the Parish Council website and Witchford Residents Facebook Group page, and in The Witchfordian village magazine.

- 2.4 Over time, the Witchford Residents Facebook Group page was found to be a particularly useful conduit for informing residents about updates with the Witchford Neighbourhood Plan and for getting feedback, on a day-to-day basis. This Facebook Group is for Witchford residents only and membership is by invitation only. As at June 2019 there are 2054 members, out of a village population of 2360 (2015 figure).

3. Inception stage December 2015 – September 2016

- 3.1 East Cambridgeshire District Council adopted the East Cambridgeshire Local Plan on 21st April 2015. However, following a successful planning appeal in June 2015, the reliability of the five-year housing supply as set out in that Local Plan was brought into question. The fact that the successful planning appeal that had led to the District Council reviewing its Local Plan was for a housing development in Witchford meant that this was a high-profile matter in the village.
- 3.2 In October 2015 the Parish Council was advised by District Council planners that the village development envelope and the Village Vision (a Witchford-focused chapter in the 2015 East Cambridgeshire Local Plan) were no longer valid. The formal decision to prepare a Neighbourhood Plan for the parish of Witchford was taken by the Parish Council on 2nd December 2015 and the Neighbourhood Plan Committee was established in January 2016.
- 3.3 During the period January – April 2016 the Committee was busy with various procedural matters including learning more about the Neighbourhood Plan process, appointing professional support, discussions with an adjacent parish about possibly producing a joint Neighbourhood Plan, registering the Neighbourhood Plan Area with the District Council, and devising a work programme. The need for wide-ranging consultations with residents, local groups and relevant organisations was recognised from the very first Committee meeting.
- 3.4 It was agreed that the Annual Parish Meeting on 20th April 2016 would be a good opportunity for a Neighbourhood Plan 'launch' and to this effect a flyer was produced and hand delivered to every house in the village. This resulted in a well-attended Parish Meeting where a presentation about the Witchford Neighbourhood Plan was made by the Committee Chairman.
- 3.5 Neighbourhood Plan Committee meetings during May, June and July 2016 were also well attended by residents. A number of interested residents left their contact details; and from these a Neighbourhood Plan steering group was formed that sat from September 2016 onwards. The steering group comprised a majority of residents, with two Parish Councillors and a professional planning consultant to provide support.

4. Initial Plan Development October 2016 – July 2017

Initial Plan Development Stage - Who was consulted and how were they consulted?

- 4.1 The Neighbourhood Plan Committee and steering group followed the advice set out in the Locality Neighbourhood Plan Road Map to hold an 'early engagement' survey with Witchford residents to get a steer as to their key priorities for the parish, which could be used as a structure for further research, evidence gathering and consultation. Again, using the advice in the Locality Road Map, the survey was purposefully wide ranging to allow themes to emerge organically. The survey used the suggested questions included in the Locality Road Map (page 29 of the 2016 edition, replicated at Part C page 16 of the 2018 edition):
- What's good about living in Witchford?
 - What's bad about living in Witchford?
 - What makes a place good or bad to live in
 - What pressures affect the area now or in the future
- 4.2 This survey was printed in hard copy and two copies were delivered to every household in Witchford (2000 copies total) in November 2016. The survey was advertised via a full page article in Fenscene magazine. Fenscene magazine is published by a Witchford-based media company and is professionally delivered monthly to every house in Witchford.
- 4.3 Every house in Witchford was revisited to collect completed forms. 251 completed forms were returned. Appendix 1 is a copy of the survey leaflet. Appendix 2 is a copy of the report into the results of the survey. The themes emerging from the survey were used during the spring of 2017 to formulate a draft Vision and seven draft Objectives for the Neighbourhood Plan.



Fig. 1 Publicity for November 2016 village survey in Fenscene magazine

- 4.3 The draft Vision and Objectives were tested via direct consultation with residents by means of a presentation at the Witchford Parish Meeting on 26th April 2017 and stalls at the Rackham Primary School Funday Sunday on 25th June 2017 and the Witchford Village Fete on 2nd July 2017.



Fig. 2 Neighbourhood Plan stall at Witchford Village Fete 2nd July 2017

Initial Plan Development Stage – Summary of the main issues and concerns raised and how these have been considered and addressed in the proposed Neighbourhood Plan.

Issue or concern	How this has been addressed
Need to retain community spirit	<p>Incorporated in the overall vision for the Plan, 'To <u>value and protect the rural character and community spirit of Witchford</u>, ensuring that future development meets local needs.</p> <p>Inclusion of Objective 4 Infrastructure 'To encourage and promote the provision of sufficient infrastructure, amenities and services <u>to allow Witchford to retain its character as a self-sustaining, thriving community</u>'</p> <p>Inclusion of Policy LC2 Area of Separation with the purpose of maintaining Witchford as a distinct community.</p>
Housing development and its effect on village.	<p>Reinstatement of the village development envelope as part of policy SS1 A Spatial Strategy for Witchford.</p> <p>Inclusion of Objective 3 Housing 'To maintain a thriving community through the provision of housing to meet the range of needs of current and future</p>

	<p>residents of Witchford’.</p> <p>Inclusion of Policy H1 Housing Mix and Policy H2 Affordable Housing to ensure housing development addresses the needs of all sectors of the population.</p> <p>Inclusion of requirement for a Building for Life Assessment and Policy H3 Housing Design to ensure housing development is sympathetic to the rest of the village.</p>
Impact of housing development on social infrastructure especially public transport, schools and GP services	<p>While the provision of these services is beyond the remit of the Neighbourhood Planning process, they are included in Section 6 Community Projects under CIL Funded Project List and schemes the Parish Council will support and lobby for.</p> <p>Objective 4 ‘Infrastructure: To encourage and promote the provision of sufficient infrastructure, amenities and services to allow Witchford to retain its character as a self-sustaining, thriving community’ allows for policies to be developed to address these concerns within the bounds of the Neighbourhood Planning process.</p>
Need to support provision of services such as pub, post office, shops, social club.	<p>Joint working with Village Hall Committee to look at wording for Policy IC2 Witchford Village Hall and Recreation Ground.</p> <p>Inclusion of Policy IC3 Protection of Witchford’s Community Facilities directly to address these concerns.</p>
Concerns about volume and speed of traffic through the village	<p>During 2018 Witchford Parish Council developed and adopted Policies relating to pedestrian and cycle spine route, and grade-separated crossing at A10 into Ely.</p> <p>Inclusion of Objective 5 ‘Traffic in Witchford: To address issues relating to the speed and volume of traffic through the village, and to create attractive and usable opportunities for pedestrian and cycle access within Witchford with the aim of reducing in-village car use’</p> <p>Inclusion of Policy T1 Getting Around the Village, including the aim of creating a more walkable neighbourhood and implementing local transport improvements.</p>
The desire to protect green space and open space within and around the village	<p>Commissioning and adopting Witchford Landscape Appraisal as a core part of the Neighbourhood Plan, informing policy development throughout the Plan.</p>

	<p>Inclusion of Policy LC1 Landscape and Settlement Character and Policy, particularly protecting areas where the surrounding landscape extends into the village, and protecting views from the village to the wider countryside.</p> <p>Inclusion of Objective 2 'Green infrastructure: To identify, protect and enhance the green infrastructure, open spaces and valued views of Witchford and the opportunities to enjoy the Witchford countryside</p> <p>Inclusion of a suite of Green Infrastructure policies: Policy GI1 Public Rights of Way, GI2 Local Green Space, and GI3 Development and Biodiversity. Production of the Local Green Spaces Report detailing the importance of each designated site to the local residents.</p>
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5. **Advanced Plan Development August 2017 – May 2019**

- 5.1 Policy development was undertaken by the Neighbourhood Plan Steering Group and Neighbourhood Plan Committee, under the headings of the seven Objectives. Detailed policy development was also informed by the results of further consultations during 2018-19.

Advanced Plan Development Stage - Who was consulted and how were they consulted?

- 5.2 A second residents survey was held in January and February 2018. 1000 copies of the questionnaire were printed and one copy was professionally delivered to every household in Witchford (961 houses) over the weekend of 3rd-4th February 2018. The questionnaire was also put online via SurveyMonkey (set up to allow only one response per IP address to try to avoid multiple responses from one address). An advert was placed in the village magazine, boards and banners placed around the village and regular postings made on the Witchford Residents Facebook page. The questionnaire comprised 47 questions and a free text box for respondents to raise any other issues.



Fig.3 Front page of village magazine January 2018

- 5.3 Overall, 410 individual responses were made to the questionnaire, representing an approximate response rate of 40%. Appendix 3 is a copy of the February 2018 questionnaire and Appendix 4 is a copy of the report on the questionnaire taken to the Neighbourhood Plan Committee on 13th March 2018.
- 5.4 To accompany the questionnaire, the Neighbourhood Plan Committee held a drop-in session on Tuesday 20th February 2018 2-6pm at St Andrew's Hall Main Street Witchford. A report on the drop-in session is at Appendix 5.



Fig.4 St Andrew's Hall drop-in session 20th February 2018



Fig.5 Drop-in session 20th February 2018

5.5 Further consultations during 2018 were:

- i. Business survey June 2018 (copy at [Appendix 6](#) and report at [Appendix 7](#))
- ii. Local Green Space surveys on potential Local Green Space sites at Sandpit Drove and at land south of Main Street (copy of forms at [Appendix 8](#) and summary at [Appendix 9](#)) – full details of these surveys are included in the Local Green Space Report accompanying the Witchford Neighbourhood Plan.
- iii. A dedicated Facebook page was set up in June 2018 to collect posts about how people use and enjoy the proposed Local Green Space sites in Witchford – full details of posts on this page are included in [Appendix 10](#).

Advanced Plan Development Stage – Summary of the main issues and concerns raised and how these have been considered and addressed in the proposed Neighbourhood Plan.

Issue or concern	How has this been addressed
Demand for smaller homes and bungalows	Inclusion of Policy H1 Housing Mix to ensure housing development meets the needs of the local population, and
Provision of affordable homes	Inclusion of Policy H2 Affordable Housing to address this issue.
Support for provision of office space and flexi-working space	Inclusion of reference to provision of serviced office space in Policy IC2 Witchford Village Hall and Recreation Ground. Inclusion of Policy E1 Support for small business development
Support for area of separation between Witchford, the bypass and the Lancaster Way Business Park	Inclusion of Policy LC2 Witchford Area of Separation specifically to address this issue.

<p>Support for retaining the rural character of paths and open green spaces</p>	<p>Inclusion of Objective 2 Green infrastructure: <i>To identify, protect and enhance the green infrastructure, open spaces and valued views of Witchford and the opportunities to enjoy the Witchford countryside.</i></p> <p>Protection of the amenity value of existing public rights of way is included in Policy GI1.</p> <p>Inclusion of Policy GI2 Local Green Space. Production of the Local Green Spaces Report detailing the importance of each designated site to the local residents.</p> <p>Countryside views from public paths and green spaces as shown on Policy Map 8 to be protected as part of Policy LC 1 Landscape and Settlement Character</p>
<p>Protection of businesses that are important for the community e.g. Post Office, garage</p>	<p>Inclusion of and Policy IC3 Protection of Witchford's Community Facilities directly to address these concerns.</p>
<p>Rat-running, traffic speed and traffic volume</p>	<p>Inclusion of Objective 5 '<i>Traffic in Witchford: To address issues relating to the speed and volume of traffic through the village, and to create attractive and usable opportunities for pedestrian and cycle access within Witchford with the aim of reducing in-village car use</i>'.</p> <p>Policy IC1 Witchford Infrastructure and Community Facilities includes as a priority: '<i>traffic management to reduce congestion and deter A142 traffic from using the village as a 'rat run</i>'.</p> <p>Policy T1 Getting around the village aims to '<i>help to create a more walkable neighbourhood in the village</i>', and encourages physical measures to improve local transport where appropriate to development proposals.</p> <p>The proposed pedestrian and cycle spine route stretching from Sutton Road to Marroway Lane, Marroway Lane to Common Road, from Common Road to Witchford Village College and from Witchford Village College to Lancaster Way is referred to in Policy T1, and in Site Allocation Policies WFDH1 and WFDH2.</p> <p><i>'Traffic management to reduce congestion and deter A142 traffic from using the village as a 'rat run' is an 'overriding</i></p>

	<i>infrastructure priority</i> in Policy IC1 Witchford Infrastructure and Community Facilities.
Support for the provision of a network of paths linking residential areas	<p>The proposed pedestrian and cycle spine route stretching from Sutton Road to Marroway Lane, Marroway Lane to Common Road, from Common Road to Witchford Village College and from Witchford Village College to Lancaster Way is referred to in Policy T1, and in Site Allocation Policies WFDH1 and WFDH2.</p> <p>Integrating new development into existing neighbourhoods is part of the Building for Life assessment required in Policy H3 Housing Design.</p>
Increase facilities for indoor and outdoor sports, and increase facilities for community groups	Inclusion of Policy IC2 Witchford Village Hall and Recreation Ground.
Increase facilities for young people.	<p>Inclusion of Policy IC2 Witchford Village Hall and Recreation Ground.</p> <p>Inclusion of Objective 6 and Policy C1 <i>Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes</i> aims to provide a safe segregated crossing over the A10 into Ely to allow young people to access Ely Leisure Park and city facilities more easily.</p>
Social infrastructure especially public transport and GP services	While the provision of these services is beyond the remit of the Neighbourhood Planning process, they are included in Section 6 Community Projects under CIL Funded Project List and schemes the Parish Council will support and lobby for.
Physical separation from Ely	<p>Village distinctiveness is a core part of the Neighbourhood Plan Vision <i>'To value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs'</i></p> <p>Inclusion of Objective 1 Landscape and character: <i>To maintain the rural fenland character of Witchford. To protect the open space between Witchford and Ely, so that the village remains a distinct and separate community</i></p> <p>Inclusion of Policy LC2 Witchford Area of Separation specifically to address this issue.</p>
Effect of development on schools	Consultations have been held with Cambridgeshire County Council Education Team, resulting in discussions at section 2.5 and 5.7.3 of the Witchford

	Neighbourhood Plan.
Safety of A142 junctions	Beyond the remit of the Neighbourhood Planning process. However, Policy C1 <i>Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes</i> aims to enable residents to use non-car transport into Ely which would lessen the effect of A142 junction issues.

6. Regulation 14 pre-submission consultation

- 6.1 Witchford Parish Council undertook a formal pre-submission consultation on the Witchford Consultation Draft Neighbourhood Plan as required by the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended) during the six-week period 12th June – 25th July 2019.

Regulation 14 Consultation Stage - Who was consulted and how were they consulted?

- 6.2 A poster advertising the consultation and a drop-in session on 19th June 2019 at St Andrew's Hall was produced. A copy of the poster is at [Appendix 11](#). This poster was professionally delivered along with the Fenscene magazine to every house in Witchford. A full-page advert was also taken out in the June edition of Fenscene magazine. Banners were placed around the village similarly to during the February 2018 questionnaire.



Fig.6 Publicity board during Regulation 14 Consultation

- 6.3 Information about the consultation including a link to the Witchford website page where the Neighbourhood Plan documents were uploaded was posted onto the Witchford Residents Facebook page twice a week during the consultation period.
- 6.4 A hard copy summary of the Plan policies, copy of the Inset Map and information about how to comment were placed on the village notice board for the duration of the consultation period. A hard copy of the full Consultation Draft Neighbourhood Plan and the Local Green Space Report was put on deposit at the Witchford Post Office for the duration of the consultation period. A summary of the Plan policies

was also produced and placed online and in hard copy at the Witchford Post Office.

- 6.5 In order to assist respondents in structuring their replies around the Plan, a comments form was produced and placed online and in hard copy at the Witchford Post Office. A drop-box for hard copy responses was placed in the Witchford Post Office for the duration of the consultation period. A copy of the comments form is at [Appendix 12](#).
- 6.6 The drop-in session 3-7pm Wednesday 19th June at St Andrew's Hall was well attended and a report on the session is at [Appendix 13](#).
- 6.7 Regulation 14 b) of the Neighbourhood Planning (General) Regulations 2012 requires that Witchford Parish Council should consult any Consultation Body set out in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan. Accordingly, the following statutory bodies were notified by email of the consultation and were invited to respond (a copy of the standard email is included at [Appendix 14](#)).

Table 1. Statutory bodies consulted	
Consultation Body under Schedule 1 of the Neighbourhood Planning Regulations	Body contacted
A local planning authority, county council or parish council any part of whose area is in or <u>adjoins the area of the local planning authority</u>	East Cambridgeshire District Council
A local planning authority	Huntingdonshire District Council
A local planning authority	Fenland District Council
A local planning authority	South Cambridgeshire District Council
A local planning authority	Kings Lynn and West Norfolk District Council
A local planning authority	West Suffolk Council
County council	Cambridgeshire County Council
County council	Norfolk County Council
County council	Suffolk County Council
Parish Council	Little Thetford Parish Council
Parish Council	Wilburton Parish Council
Parish Council	Coveney Parish Council
Parish Council	Little Downham Parish Council
Parish Council	Wentworth Parish Council
The Coal Authority	The Coal Authority
Homes and Communities Agency	Homes and Communities Agency
Natural England	Natural England
Environment Agency	Environment Agency
The Historic Buildings and Monuments Commission for England	Historic England
Network Rail	Network Rail
Highways Agency	Highways Agency
Marine Management Organisation	Marine Management Organisation
any person— (i) to whom the electronic communications code applies by virtue	UK Mobile Operators Association

of a direction given under section 106(3)(a) of the Communications Act 2003; and (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority	
a Primary Care Trust established under section 18 of the National Health Service Act 2006(7) or continued in existence by virtue of that section;	Cambridgeshire PCT
a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8);	National Grid UK Power Networks
A sewerage undertaker	Anglian Water
A water undertaker	Anglian Water
Individual consultation body	Ely Internal Drainage Boards
Voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area	Manor Road Allotments Group Witchford Amateur Dramatic Society Witchford Voices Witchford WI Parish Tree Warden Witchford Open Spaces Group Ely Cycle Campaign Witchford Scouts Witchford Brownies Witchford Playing Field Association Wildlife Trust BCN
Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area	Voluntary and Community Action East Cambs
Bodies which represent the interests of different religious groups in the neighbourhood area	St Andrew's Church St Andrew's Hall Ely Diocese Baptist Union of Great Britain
Bodies which represent the interests of persons carrying on business in the neighbourhood area	Sedgeway Business Park Lancaster Way Business Park
Bodies which represent the interests of disabled persons in the neighbourhood area	Ely Soham Association for Community Transport Disability Cambridgeshire East Cambridgeshire Access Group

- 6.8 In addition, as a matter of courtesy and to ensure as wide a range of responses as possible, the following groups were also contacted directly by email or by letter (a copy of the standard letter is included at [Appendix 15](#)): individual landowners where landownership details known of, Savills, Taylor Vinters, Abbey Homes, Gladman Developments, Catesby Estates, Bovis Homes, Manor Oak Homes, RPS Group, Sanctuary Housing, Sedgeway Equestrian Centre, Witchford Post Office, Witchford pub, schools in the Plan area, the Cambridgeshire County Councillor for the Sutton Division, the East Cambridgeshire District Councillors for the Stretham Ward.

6.9 Summary of Regulation 14 Consultation responses.

The following comments were received during the consultation period:

Category	Number of comments received	Respondent
Resident	20	Name and contact details given but not published
Statutory Consultees	10	<p>East Cambridgeshire District Council</p> <p>Anglian Water</p> <p>Witchford Post Office</p> <p>Litteport and Downham Internal Drainage Board</p> <p>Ely Cycling Campaign</p> <p>Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust</p> <p>Historic England</p> <p>National Grid</p> <p>Environment Agency</p> <p>Highways Agency</p>
Landowners/Agents	7	<p>Abbey Properties Cambridgeshire Limited on behalf of Peter Seymour, Michael Seymour, Nicholas and Judith Holdsworth and Abbey Properties Cambridgeshire Limited</p> <p>Nicholas and Judith Holdsworth</p> <p>Gladman</p> <p>Deloitte on behalf of the Church Commissioners for England</p> <p>Cerda Planning Ltd on behalf of Catesby Strategic Land Ltd</p> <p>Savills on behalf of Bellway Homes Limited (Eastern Counties)</p> <p>Savills on behalf of Manor Oak Homes Ltd</p>

- 6.10 Residents' comments were broadly in support of the Consultation Draft Neighbourhood Plan, with a small number of more substantive comments which resulted in amendments to the Plan. The residents' comments were considered in detail by the Neighbourhood Plan Steering Group during August 2019. The Steering Group made a number of recommendations to the Parish Council about amendments to the Neighbourhood Plan text. The Parish Council considered all the residents' comments and the Steering Group's recommended responses at its meeting on 4th September 2019. [Appendix 16](#) is a tabulated summary of all the residents' comments with the Steering Group's response to each.
- 6.11 Statutory consultee comments were in support of the Consultation Draft Neighbourhood Plan, with a small number of more substantive comments which resulted in amendments to the Plan. The statutory consultee comments were considered in detail by the Neighbourhood Plan Steering Group during August 2019. The Steering Group made a number of recommendations to the Parish Council about amendments to the Neighbourhood Plan text. The Parish Council considered all the statutory consultee comments and the Steering Group's recommended responses at its meeting on 4th September 2019. [Appendix 17](#) is a tabulated summary of all the statutory consultee comments with the Steering Group's response to each.
- 6.10 A number of areas of disagreement with the content and/or wording of the Consultation Draft Neighbourhood Plan were raised in the landowner/agents' comments. The landowner/agents' comments were considered in detail by the Neighbourhood Plan Steering Group during August 2019. The Steering Group made a number of recommendations to the Parish Council about amendments to the Neighbourhood Plan text. The Parish Council considered all the landowner/agents' comments and the Steering Group's recommended responses at its meetings on 4th and 18th September 2019. [Appendix 18](#) is a tabulated summary of all the landowner/agents' comments with the Steering Group's response to each.
- 6.11 The Cambridgeshire County Council Education Officer submitted a late response on 12th August 2019. This response and the Neighbourhood Plan Steering Group's comments were considered by Witchford Parish Council on 4th September 2019 and a copy is included at [Appendix 19](#).
- 6.12 [Appendix 20](#) is a full listing of all the changes to the Consultation Draft Witchford Neighbourhood Plan approved by the Parish Council, which have been incorporated into the text of the Submission Witchford Neighbourhood Plan.
- 6.13 The key amendments to the Plan in response to the comments made during the Regulation 14 consultation are:
- the refinement of Policy LC2 Witchford Green Wedge into Policy LC2 Witchford Area of Separation Policy to reflect more accurately the intent and purpose of the policy
 - the refinement of Policy GI2 Local Green Space supporting text to more accurately reflect the evidence base for the policy
 - the addition of more detail regarding acceptable measures to enhance biodiversity and decrease flood risk to Policy GI3 Development and Biodiversity

- the refinement of Policy IC4 Flooding to reinforce the importance the Witchford Neighbourhood Plan places on Sustainable Drainage Systems
- the addition of further detail on development design under Policy WNP – H3 Housing Design
- the addition of further information on future primary and secondary school expansion in the supporting text of Policy IC1 – Witchford Infrastructure and Community Facilities
- the addition of more detail about education provision in the Neighbourhood Plan Area in paragraph 2.5 Employment and Services
- the addition of new paragraph 6.5 including the Broad Areas of Search Map and the proposal to consider education provision at the first Review of the Neighbourhood Plan.

DRAFT

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 1





How do you see the future of Witchford?

Make your views known

Please fill in this questionnaire to help us identify the key issues that are important to you!

Someone from the Neighbourhood Plan Group will be back to collect it. Alternatively you can post your completed questionnaire at Witchford Post Office or Fresh Approach hairdressers, both on Main Street.

What makes a place good or bad to live in?

.....

.....

.....

.....

.....

What pressures affect the area now or in the future?

.....

.....

.....

.....

.....

Please tell us what age group you are:

Under 21 ☐ 21-55 ☐ 55 plus ☐

For more information about the Neighbourhood Plan Group contact the Parish Council on 01353 664427 or witchfordparishcouncil@eastcambbs.gov.uk



The information gathered will be put into a combined report, called a Neighbourhood Plan. The Neighbourhood Plan won't stop how many new houses are being built but it will help influence decisions on village development.

Not only are local authorities, like East Cambridgeshire District Council, legally obliged to take notice of it, by completing a Neighbourhood Plan, Witchford will also get a bigger share of money from any future development that will be invested back into our community!

Please fill in this questionnaire to help us identify what is most important to you!

One of the volunteers from the Neighbourhood Plan Team will return to collect it.

Remember, your replies are completely confidential – but if you would like to get involved – this is a great opportunity to put your name forward!

Witchford Parish Council and The Neighbourhood Plan Team



Witchford Neighbourhood Plan Consultation Statement

APPENDIX 2

FINAL Report on Witchford Village Survey – November 2016

Survey delivered to all residents – total approx. 800 houses, and 2,000 people.

Estimate 50% of residents will be adults – approximately 1,000

Responses total = 251 – 25% of the adult population

52 separate items of interest or concern were communicated by residents (see list)

Items of note are split into 3 categories as shown in the table below:

Level of significance	ITEMS
Very significant interest or concern (Items mentioned by more than 50% of respondents i.e. 125 people or more)	<ol style="list-style-type: none"> 1. Community spirit – all comments (representing 68% of all respondents to the survey) are positive about this and some mention pressure on it from over-development. 2. Housing development – all respondents are negative about this (mentioned by 77% of respondents to the survey) with a very few accepting of some but at a manageable level, and many mentioning the pressure this puts the village under.
Significant interest or concern (Items mentioned by between 25% and 49% of respondents i.e. 63-124 people)	<ol style="list-style-type: none"> 3. Public Transport – two thirds want it to be better and just over a third think it is already good. 4. Schools – most think it is good and a third are concerned about the pressures they are under from development. 5. Post Office – most respondents are positive about it but a few would like it to be better (bigger, more services) 6. Shops – one quarter of responses are positive and three quarters of responses are negative (wanting more shops) 7. Services – 1 in 6 responses were positive and 5 of 6 negative (wanting better services, the majority wanting a Dr's surgery) 8. Peace and quiet – positive about this aspect of village life 9. Traffic volume – negative about this and also concerned about additional pressure related to expansion of the village. 10. Open spaces – positive but concern re development pressure



<p>Some interest or concern (Items mentioned by between 10% and 24% of respondents i.e. 25-62 people)</p>	<ol style="list-style-type: none"> 11. <u>Safe</u> - nearly all positive about this with some expressing concerns over the impact of development 12. <u>Village size</u> – positive but concern regarding development pressure 13. <u>Proximity to Ely</u> – positive 14. <u>Play park</u> – most positive but some wanting improvements or one suitable for older children 15. <u>Traffic speed</u> – negative 16. <u>Amenities</u> – most positive but some negative about the range, and some comments on pressure related to development 17. <u>Parking</u> – negative 18. <u>Infrastructure</u> – negative related to development pressure 19. <u>Local commuting</u> – equal positive and negative (negative related to traffic volume) 20. <u>Rural character</u> – positive and some concerns linked to development pressure 21. <u>Walks</u> - positive 22. <u>Traffic management</u> – negative – with many commenting on the village being used as a “rat run” (by commuters avoiding congestion on the A142 and A10 – which the bypass was supposed to alleviate) 23. <u>Maintenance of paths and verges</u> – positive 24. <u>Pub and social club</u> – two thirds positive and one third negative 25. <u>Sports clubs</u> – 2/3 are positive; 1/3 say not sufficient. 26. <u>Clubs for all ages</u> – 2/3 positive; 1/3 say not enough
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Bold italics items relate to traffic

Bold underline items relate to quality of life in village



Witchford Neighbourhood Plan Consultation Statement

APPENDIX 3



WITCHFORD Neighbourhood Plan

WHAT IS A NEIGHBOURHOOD PLAN?

The Localism Act 2011 gives towns and villages such as ours the opportunity to have a greater say in the future development of their area.

This is done through a Neighbourhood Development Plan (NDP)

A NDP gives the Witchford community a new way of influencing the planning decisions that affect us locally. Once in force the Neighbourhood Plan carries real legal weight and it must be taken in to account when proposals are considered for development in the neighbourhood.

A Neighbourhood Plan Can....	A Neighbourhood Plan Cannot.....
Decide on what type and design of development should happen in the neighbourhood	Propose less development than in the East Cambs Local Plan
Identify the most suitable sites for development	Prevent any development from taking place in the area
Promote more development than is set out in the Local Plan	Be in conflict with local, national or EU policies
THIS IS YOUR OPPORTUNITY TO HELP SHAPE WITCHFORD'S NEIGHBOURHOOD PLAN	Be prepared without community input, support, consultation and ultimately a local referendum
	Influence decisions that are beyond its remit e.g. bus routes and timetables / GP surgery provision

WHY THIS CONSULTATION?

The Neighbourhood Plan Steering Group (NPSG) has drafted a Visions and Objectives statement and more detailed aims for the plan, based upon information collected in the first village questionnaire held in November 2016.

A copy of the Vision and Objectives is available at www.witchfordpc.org, on the notice board by the Post Office or from the Parish Clerk at 01353 664427. The group is now seeking further community opinion so that the NDP will reflect the Witchford community's "Preferred Options".

There will be more consultation events coming up – details on the website www.witchfordpc.org or on the notice board by the Post Office.

PRIZE DRAW

If you would like to be entered into the **FREE PRIZE DRAW** – where two lucky respondents will win £50 each – please fill in your details below. The information given in this section will be used only so that we can contact you IF YOU ARE THE LUCKY WINNER, and will be securely destroyed immediately after the draw has been made. The winner will be picked via random number selection based on electronic and paper copies of the entries. The draw will be made at the Neighbourhood Plan Committee Meeting on 13th March.

The winning name will be published on the website www.witchfordpc.org and on the on the notice board by the Post Office, and contacted by the Parish Council.

Name

Contact email

Contact telephone number



HOW TO COMPLETE THE FORM

You will be asked whether you Strongly Agree, Slightly Agree, Slightly Disagree or Strongly Disagree about proposed policies on six key areas / objectives.

Please complete the form online at www.witchfordpc.org.

Alternatively, if you do not have access to the internet then a paper copy will be delivered to every house in Witchford village before Monday February 5th.

THERE WILL BE A NEIGHBOURHOOD PLAN DROP-IN INFORMATION SESSION ON TUESDAY FEBRUARY 20TH FROM 2 – 6PM AT ST ANDREW'S HALL

If you need help completing the form the Clerk can arrange for a member of the Steering Group to visit you to help, but they will not advise you what to put.

The group is seeking one response per household. If there is more than one household living at your address please request an additional form from the Parish Clerk on 01353 664427 or by email at witchfordparishcouncil@eastcambs.gov.uk. If you run a business in Witchford but do not live here we would welcome a response form from you but please clearly mark your response with "BUSINESS".

HOW AND WHEN TO COMPLETE THE FORM

The steering group will be collecting completed questionnaires in your area on Sunday February 11th. If you miss that date, then please return the paper copy to:

- the box at the Post Office, hairdresser or pub, or
- the box at Reception at Rackham School, or
- post through the letterbox at 55 Main Street.

The deadline is Wednesday February 14th.

The Neighbourhood Plan Steering Group thanks you for taking the time to complete this important questionnaire

VISION STATEMENT

The proposed Vision Statement for the Witchford Neighbourhood Plan is:

'To value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs'

AGREE ☐

DISAGREE ☐

TO MAINTAIN THE SEPARATE RURAL FENLAND CHARACTER OF WITCHFORD, ITS VIEWS AND OPPORTUNITIES TO ENJOY ITS OPEN SPACES

Sandpit Drove/Broadway must remain an area of green common land.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

The land between Witchford, the bypass and Lancaster Way business park should remain free from development.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

All new developments must demonstrate that they will maintain or improve wildlife habitats.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

Paths and open green spaces in and around the village should keep their rural character.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

The 'Horsefield' near the primary school between houses 97 – 105 Main Street must remain as a totally green space.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

TO SUPPORT LOCAL BUSINESS

More land should be allocated for employment purposes

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐

Policies that promote working from home should be supported.

Slightly Agree ☐

Strongly Agree ☐

Slightly Disagree ☐

Strongly Disagree ☐



Businesses that are important for the community (e.g. post office/garage) should be protected from a change of use to residential development whilst those businesses remain economically viable.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

A local skills directory should be supported.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Dedicated space for networking, workspace and business development is needed.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

TO ENSURE TRANSPORT AND COMMUNICATIONS NETWORKS MEET THE DEMANDS OF GROWTH

Make Main Street safer and less attractive for through traffic.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Provide an improved network of paths linking existing and new residential areas with village facilities.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Encourage more considerate parking in the village by introducing on-street measures to restrict parking at key locations to be decided.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Alter the Common Road / A142 junction to provide a safer and more usable exit onto the bypass.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Access to Ely on foot or by cycle is difficult.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Would additional infrastructure (e.g. bridge, underpass) make it easier to get to Ely?

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Mobile reception should be improved.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

All properties should have access to fast broadband.

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

TO ENSURE HOUSING PROVISION MEETS THE NEEDS OF WITCHFORD'S POPULATION

Is anyone in your household looking to move home within Witchford? Yes/No

If so, what type of property do they need?

Housing development allocated in the East Cambridgeshire District Council Local Plan should focus on:

Social housing/housing association (rental)

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Affordable housing (up to £250,000)

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Shared ownership housing

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Flats

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Bungalows

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Terraced houses

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Semi detached

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Sheltered accommodation

Slightly Agree ☐ Strongly Agree ☐

Slightly Disagree ☐ Strongly Disagree ☐

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 4

Report on second village-wide Neighbourhood Plan questionnaire

1. Background

1.1 First village-wide questionnaire

At its meeting on 21st September 2016 Witchford Neighbourhood Plan Committee agreed to hold a village-wide questionnaire, following the format recommended in the Locality Neighbourhood Plan Roadmap. The questionnaire was closely based on the five questions set out on page 28 of the Roadmap. The questions in the Witchford Neighbourhood Plan first questionnaire were:

- o What is good about living in Witchford?
- o What is bad about living in Witchford?
- o What makes a neighbourhood good to live and work in?
- o What pressures affect the area now or in the future?
- o What needs to change?

The aim of the questionnaire was to get a steer from residents as to what the key issues are that should be addressed in the Witchford Neighbourhood Plan.

2000 copies of the questionnaire were printed and two copies were delivered by members of the Neighbourhood Plan Committee to every household in Witchford during the first week of November 2016. The Committee members returned to collect completed questionnaires during the second half of November. There were also drop boxes in the Post Office and the hairdressers; these were collected on 30th November 2016.

251 completed questionnaires were returned. These were analysed by three volunteers, with results entered into an Excel spreadsheet. A report highlighting the results was presented to the Neighbourhood Plan Committee on 18th January 2017.

Draft objectives based on the questionnaire priorities were adopted by the Neighbourhood Plan Committee on 19th April 2017 (with the housing objective being modified after 'road-testing' at various public events during June and July 2017).

The draft objectives are:

- To maintain the separate rural fenland character of Witchford, its views and opportunities to enjoy its open spaces
- To support local business
- To ensure transport and communications networks meet the demands of growth
- To protect and enhance education facilities
- To ensure that Witchford can influence the type of homes built in the future
- To promote the health and well-being of Witchford residents

- To encourage and promote the provision of sufficient infrastructure, amenities and services to support the local community.

1.2 Workshop with consultants

On 21st November 2017 the Neighbourhood Plan steering group met with a consultant from Modicum Planning to carry out a SWOT analysis, review the local and national policy context, discuss the Demographic & Socio-Economic Review data for Witchford and to review the draft objectives. These discussions fed into the development of the second questionnaire.

2. Purpose

The purpose of the second questionnaire was to drill-down into the draft Objectives set by the Neighbourhood Plan Committee to get a steer from the Witchford residents as to their priorities for policy setting within each Objective.

The questionnaire was structured around the draft objectives, but the steering group took the view that as the Neighbourhood Plan could not directly influence the provision of educational facilities the questionnaire should not include questions on this.

The questionnaire comprised of 47 questions (including one question asking residents to agree or disagree with the proposed Neighbourhood Plan Vision Statement and one open-ended question asking for general comments). The possible responses were 'strongly agree/slightly agree/strongly disagree/slightly disagree'.

3. Distribution and publicity

1000 copies of the questionnaire were printed and one copy was professionally delivered to every household in Witchford (961 houses) over the weekend of 3rd -4th February 2018. The questionnaire was also put online via SurveyMonkey (set up to allow only one response per IP address to try to avoid multiple responses from one address).

The Neighbourhood Plan Committee took out an advert in the February 2018 edition of the village magazine FenScene; there was also a full-page editorial item on the Neighbourhood Plan including details of the questionnaire in that issue of the magazine.

The questionnaire was promoted by multiple postings on the Witchford Residents Facebook Page including a pinned post.

The village Post Office hosted a drop-in box for returned questionnaires and put up reminders on their notice board and A-board.

Promotional signs were posted around the village throughout February.

4. Responses

Hard copy forms were collected by various means. Members of the Neighbourhood Plan Committee collected forms from households in person on 11th February. Copies were also deposited in drop-box at the village Post Office and directly to the home of the

Neighbourhood Plan Committee Chairman. Some forms were collected at the drop-in session on 20th February. Responses were also collected online. The responses on the hard-copy forms were entered manually into SurveyMonkey so that there would be a single database of responses and so results could be analysed automatically.

By 6th March 2018 when the online survey closed, 410 individual responses had been made. This represents an approximate response rate of 40%. Of these, 224 were hard copy and 186 online.

5. Results

Initial analysis of the responses indicate:

- There is strong support for the proposed Vision Statement 'To value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs'.
- There is strong support for the green spaces and rural aspect of Witchford to be protected.
- There is support for employment opportunities local to Witchford including encouraging home working.
- There is strong support for a wide housing mix in new any development.
- There is strong support for infrastructure and other physical measures to make travelling within Witchford easier.
- There is strong support for increased facilities for the community, over a range of ages.

Further work is needed by the Neighbourhood Plan Committee and steering group to analyse the responses and develop draft policies.

164 respondents made additional comments at the end of the questionnaire. Many of these alluded to issues that cannot ideally be addressed through the Neighbourhood Plan process, but which the Parish Council could look at separately. The most popular topics for comment were:

- The need for infrastructure to be put in place before new housing development was built
- Problems with existing traffic volume and concerns of the effect on new housing development on traffic levels both within Witchford and the wider locality
- The need for a GP facility in Witchford
- The need for a more regular bus service through Witchford

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 5

Witchford Neighbourhood Plan

Report on public information drop-in session Tuesday 20th February 2018 2- 6pm St Andrews Hall Main Street Witchford .

1. Purpose

The drop-in session was intended as a tie-in with the village-wide survey which ran from 5th-23rd February 2018. A copy of the survey was delivered to every house in Witchford and was also available online (SurveyMonkey). The drop-in session was advertised in the text of the survey. The Neighbourhood Plan Committee felt that residents being able to raise any comments and questions about the survey and the issues highlighted in it, and to raise any additional issues with Committee members directly would add extra depth to the survey. The drop-in session would also allow residents to ask questions about the Neighbourhood Plan process itself.

An additional purpose of the drop-in session was to contribute to the evidence of what residents consider to be the most important green spaces and landscape areas in the village (arising out of the analysis of the first questionnaire November 2016 which clearly showed that protection of green space is a priority for residents). Maps of Witchford were laid out at the drop-in session with the intention that residents could use them to highlight those areas which mean the most to them, including physically marking these on the map if they felt confident to do so.

2. Publicity

The date, time and venue of the drop-in session was included in the text of the survey forms delivered to every household in Witchford and on the online version. The Neighbourhood Plan Committee also paid for an advert in the village magazine Fenscene, which is delivered to every house in the village. Fenscene also ran a half-page editorial item on the survey including the drop-in session details.

Details about the drop-in session was posted on the Parish Council website and also repeatedly on the Witchford Residents Facebook page.

Banners and boards advertising the survey and the drop-in session were also produced as shown in fig.1



Fig.1 St Andrew's Hall 20th February 2018

3. Attendance

An attendance log was maintained throughout the four-hour period of the drop-in session 2 – 6pm. 20 individual adults attended and four children (with parent/carer). From observation, the attendees were three younger women with children (attended shortly after the Rackham Primary School closed for the day at 3.15pm), one younger unaccompanied man, and the remaining 16 adults appeared to be older (retired?).

Refreshments (tea, coffee and biscuits) were offered to the attendees without charge.

Seven members of the Neighbourhood Plan Committee were present at the drop-in session at different times through the afternoon. The Parish Clerk was also present throughout the session.

4. Responses

Most responses were made in discussion with the Committee members. The Clerk then questioned the Committee members after the meeting to capture the key themes that arose during the discussions, which were:

- The need for children to have the opportunity for unstructured rough play.
- Traffic volume and speed on Main Street – including calls for controlling access at the A142/Sutton Road junction (this was in addition to the question on the A142/Common Road junction included in the survey form).
- Protection of the village green spaces especially the ‘horsefield’.
- The need to control the scale of housing development.
- The need to remain a distinct village community and retain the rural character of Witchford.

Written comments left on post-it notes were:

- School time parking restrictions
- Protect open spaces
- Keep Witchford’s boundaries secure
- Any road improvements should be paid for by developers
- Build a roundabout at A142-Sedgeway AND close Sutton Road (west end of village) mainly to stop rat-running
- Safety – roundabout at A142 bypass junction of Common Road and Sedgeway
- Wild places for kids to play – especially to make up for those taken away eg small end Gladman Dev.
- Keep our fields
- Future development must be to the benefit of Witchford residents

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 6

Witchford Neighbourhood Plan **BUSINESS SURVEY**

Witchford Parish Council is supporting the production of a Neighbourhood Plan. When in force, this Plan will be the core planning document for the parish of Witchford. This survey of the businesses in Witchford will inform policies in the Plan to support sustainable business development and promote local employment.

We want to hear **YOUR VIEWS** on what the Neighbourhood Plan should include. This is very much a bottom-up process and survey results **WILL** influence what policies go into the Plan.

More information about the Witchford Neighbourhood Plan can be found at the Parish Council website <http://witchfordpc.org/neighbourhood-plan/>

The Neighbourhood Plan Committee meets on the 2nd Tuesday of every month at St Andrews Hall and everyone is very welcome to come along and join in.

Please complete and return the survey to the Post Office or to 55 Main Street by 3rd July.

Ian Allen
Chairman Witchford Neighbourhood Plan Committee

1. What type of business do you have?

Retail
Agriculture and allied trades
Hair and beauty related
Leisure
Services
Manufacturing
Public house, food
Building and allied trades
Medical and health related
Education related
Other (please specify)

2. How many people do you employ?

None/Sole proprietor
1-5
6-10
11-20
21-50
Over 51

3. How do you rate Witchford as a place to do business?

Poor	Average	Good	Very Good
------	---------	------	-----------

4. Please tell us what are the main benefits of trading from Witchford?

5. How do these issues affect your business in Witchford?

	Positive	Negative	No effect
Availability of parking
Broadband service
Quality of the road network
Availability of bus service
Availability of suitable office space
Availability of suitable workshop space
Availability of suitable retail space
Availability of suitable land
Availability of skilled workforce
Availability of unskilled workforce
Flood risk and drainage issues
Availability of suitable housing
Local amenities
Cost of housing
Other – please specify

6. What would be your top three wish-list items for businesses in Witchford?

7. What policies should the Neighbourhood Plan include to help your business?

8. Should dedicated office space be provided in Witchford?

Yes / No

9. Should flexi – office space for short-term hire be provided in Witchford (e.g. so workers could work one-day a week from a hired office in Witchford rather than travel)

Yes / No

10. Should more land in Witchford be allocated for employment purposes?

Yes / No

11. Where should this be located?

12. Would you like to be included in a business directory for Witchford or in the proposed Welcome Pack for new residents?

Yes / No

If you would like to be contacted about this please leave your name and contact details*:

.....

.....

.....

13. How far do you live from Witchford?

In Witchford
Less than 1 mile away
Between 1-5 miles away
Between 5-10 miles away
Between 11-25 miles away
More than 25 miles away

14. How do you travel to work normally?

Car/Motorbike Public Transport Walk Cycle Work from Home

15. What proportion of your employees live...

In Witchford
Less than 1 mile away
Between 1-5 miles away
Between 5-10 miles away
Between 11-25 miles away
More than 25 miles away

16. How do your employees travel to work normally?

Car/Motorbike Public Transport Walk Cycle

17. Where is your main market?

Witchford itself
10 mile radius
East Anglia
National
International

* under Witchford Parish Council's privacy policy, your contact details will be held securely, will be used solely for the purposes of creating the Neighbourhood Plan for Witchford and will not be shared with any other party.

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 7



Witchford Neighbourhood Plan Business Survey report

1. 65 copies of the Business Survey were distributed by hand in June 2018 to all known businesses in Witchford parish (identified by personal knowledge and internet search). A copy of the survey form was placed on the Parish Council website and a link to the form was posted on the Witchford Residents Facebook Page. Arrangements were made for completed surveys to be returned to the Post Office or 55 Main Street or by email to the Clerk.
2. As at 1st August 2018 8 completed surveys have been received (it is anticipated that this will be the total number returned). This represents a response rate of 12.3%.
3. As the number of responses is low, it is difficult to extrapolate trends or key themes. However, the following responses can be noted:
 - 5 respondents rated Witchford as a good or very good place to do business
 - 3 respondents rated Witchford as an average place to do business
 - Poor broadband, cost of housing, road network and lack of buses were given the most numbers of ratings as items that have a negative impact on businesses in Witchford
 - Local amenities, available workforce and the road network were given the most numbers of ratings as items that have a positive impact on businesses in Witchford
 - Of those who answered a small majority favoured the provision of more office space in Witchford
 - Of those who answered a small majority favoured the provision of more flexi-working space in Witchford
 - Of those who answered a clear majority was against the allocation of more land for employment in Witchford
4. The survey asked for suggestions for policies to help business, that might be included in the Neighbourhood Plan. These were wide-ranging, reflecting the range of business types covered by the responses. However, themes can be detected; these are traffic issues, improvements in the wider transport network, broadband improvements and the provision of low-cost housing.

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 8



HELP SAFEGUARD THIS GREEN SPACE – WE NEED YOUR VIEWS

Please complete this short survey for the Neighbourhood Plan and
return it to 3 Broadway or 55 Main Street

LAND LEADING SOUTH OF MAIN STREET TO COMMUNITY ORCHARD

How often do you come here?

What do you particularly value about this place?

Why do you come on this route?

How important is green footpath exercise to you (1 = not important
5= very important) – please circle

1 2 3 4 5



HELP SAFEGUARD THIS GREEN SPACE – WE NEED YOUR VIEWS

Please complete this short survey for the Neighbourhood Plan and
return it to 3 Broadway or 55 Main Street

SANDPIT DROVE

How often do you come here?

What do you particularly value about this place?

Why do you come on this route?

How important is green footpath exercise to you (1 = not important
5= very important) – please circle

1 2 3 4 5

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 9

Witchford Neighbourhood Plan

Local Green Space Surveys August 2018

1. Background

In order to gain direct evidence from residents about the use and public perception of the two areas proposed for designation as Local Green Space (LGS) in the Witchford Neighbourhood Plan, the Neighbourhood Plan group agreed to carry out on-site surveys for each of the proposed LGS areas. The method was to place a supply of printed copies of a very short survey (four questions) on each of the LGS areas and ask users to fill them in there and then, and to drop them off at addresses at the end of each LGS area. This took place during August 2018.

2. Results as at 11th September

Sandpit Drove – 23 forms

Land south of Main Street – 18 forms

All responses were greatly appreciative the LGS areas, for dog walking, exercise and to appreciate the countryside, tranquillity, peace and quiet, and wildlife and nature. There are many references to how the areas are so easily accessible from the village and bring the countryside into the village. Use ranges from daily to 2-3 times per month.

3. Selected quotes

Sandpit Drove:

‘I am disabled and often struggle to walk. I can park next to electricity station and immediately walk’

‘There are lots of wild flowers and an area which is managed by a hard working team to keep it nice. The bench is convenient and being able to rest is inviting to me and others to meet by and chat. All giving it its valuable rural calming feel’

‘It’s totally different from walking in the built up area of the village’

‘Its peacefulness, the nature and wildlife’

‘Because there is no traffic’

Tranquil. Views towards Ely Cathedral. I feel truly in the countryside’

Land south of Main Street:

‘For the sheer pleasure of safe open countryside in close proximity – a very precious village amenity indeed’

‘The openness. The feeling of tranquillity. Lovely to have a green space in the centre of the village’

‘You are the country as soon as you walk through the gate, it is in the heart of the village. One day you can walk on your own and other there could be six or more people you bump into. Great for people’s well-being chatting, putting the world to rights. We don’t want neat path to walk on, we love to walk on the grass’

‘I come for peace and quiet, to walk in the countryside – it is my favourite short walk in Cambridgeshire’

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 10

Witchford Local Green Space Facebook page

1. A dedicated Facebook page was set up in June 2018 to collect posts about how people use and enjoy the proposed Local Green Space sites in Witchford.

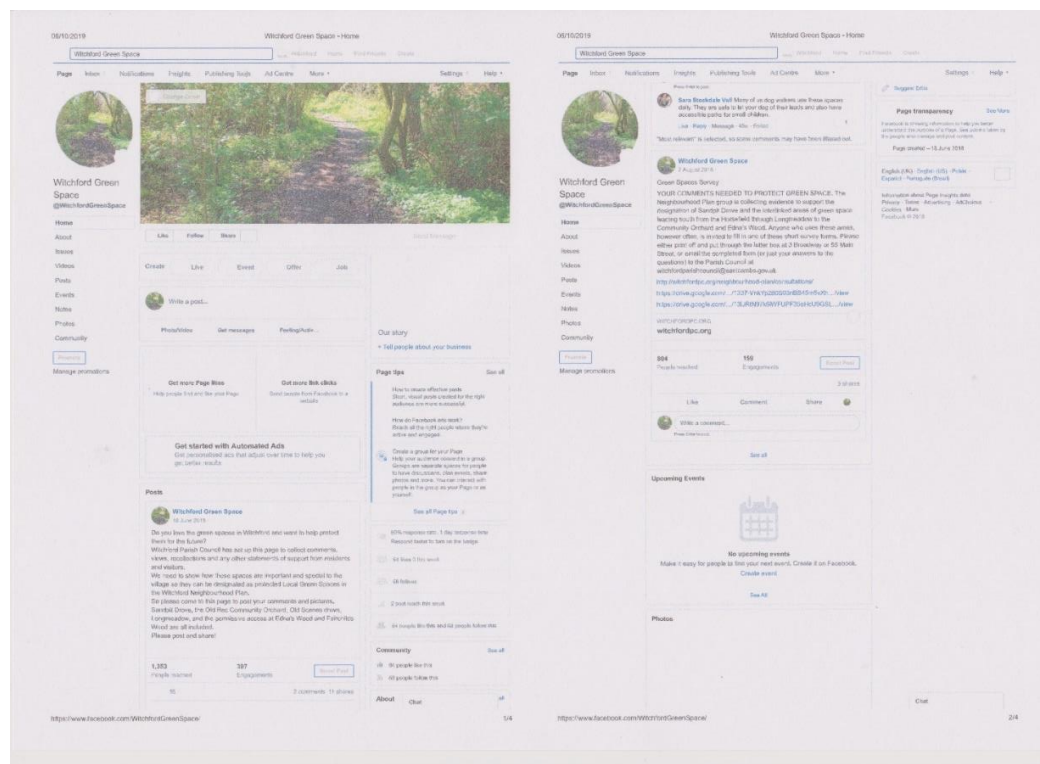


Fig.1: Witchford Green Space Facebook page

2. Table of transcripts of posts collected June – December 2018

Date	Transcript of post
24 th June 2018	Love finding new bits of Witchford on our doggie walks
26 th June 2018	So lucky to have this on our doorstep thank you to all that make it happen
26 th June 2018	Photograph added from walk on Sandpit Drove
1 st July 2018	Love our walks with the doggie and seeing new wildlife, close encounter with baby foxes and a fallow deer seen this morning
22 nd July 2018	As a family we love all the green space and most days walk our dog. We love the peace and quiet and ease of access as the paths all link together. Our favourites include long meadow, Edna's Wood, the community orchard and Sand pit Drove area. Nothing beats being in the fresh air and green spaces of our lovely village!
18 th August 2018	Photograph added from walk on Sandpit Drove
9 th September 2018	We are new to the area, and have been introduced to these walks for our dogs. We really enjoy them. Here is a photo from the community orchard.
18 th November 2018	Love that this is all on my doorstep and there for all to enjoy xx [with a suite of photographs from Millennium Wood and Sandpit Drove]
27 th December 2018	Brilliant Boxing Day toasting Marshmallows in Millennium wood!!! Lights in the trees... carols and sticky marshmallows!! What's not to like!!!

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 11



WITCHFORD Neighbourhood Plan

Have YOUR Say!

Your chance to influence
Witchford's future development.

**NEIGHBOURHOOD
PLAN DROP-IN**

Wednesday June 19th 3pm - 7pm
Q&A session at St Andrew's Hall

Witchford's Neighbourhood Plan is the key to ensuring inevitable new development in our village brings with it a fair and greater share of benefits.

Having a Neighbourhood Plan means housing developers are obliged to consider the impact on our community. This could involve environmental concerns, traffic management in our village and infrastructure such as as affordable housing.

The Parish Council and a Steering Group of Witchford residents have been working on the Neighbourhood Plan since 2016. The over-arching theme of the Witchford Neighbourhood Plan is to value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs.

The Witchford Neighbourhood Plan must comply with the District Council housing allocations for the village – this is a requirement for the Neighbourhood Plan to be adopted. But, following previous consultations in 2016 and 2018, the Witchford Neighbourhood Plan aims to protect local green space and to ensure there is a clear buffer between Witchford and Ely and Lancaster Way.

We have a fixed window of opportunity to consult which runs from June 12th to July 25th. As well as the drop-in at St Andrew's Hall on Wednesday June 19th, you can also view Witchford's Draft Neighbourhood Plan at:

- Witchford Post Office & Stores
- Parish Council meetings, St Andrew's Hall, July 3rd and 17th from 6pm.
- Online at www.witchfordpc.org/neighbourhoodplan

Send comments via witchfordparishcouncil@eastcambs.gov.uk
Or via comments box on website
www.witchfordpc.org/neighbourhoodplan
Or in the drop box at Witchford Post Office & Stores

Prefer to use the post? Send your comments to:
Witchford Parish Council via Parish Clerk,
88 West Fen Road, Ely, CB6 3AA
Please note, we cannot accept anonymous comments.

Best Community Investment

Once the Neighbourhood Plan is in place, Witchford will receive 25% of the Community Infrastructure Levy - a payment made by developers towards providing infrastructure for the local community. Without a Neighbourhood Plan, that community allowance is only 15%. In effect, it means the £40,000 awarded to the village, from the current Field End development, would have been increased to nearly £67,000.

What Happens Next?

Following this period of consultation, the revised Witchford Neighbourhood Plan will be submitted to East Cambridgeshire District Council in the Autumn. Witchford residents will have the final say on the Neighbourhood Plan in a referendum during the Winter of 2019/20.

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 12

Witchford Neighbourhood Plan Consultation Draft comments form

Your name:

Your street:

1: Are you in broad agreement with the proposed Neighbourhood Plan (see Vision and Objectives in Chapter 4)?

Yes/no/don't know

Comment:

2. Do you have detailed comments on the proposed policies?

Policy Number and title	Agree/disagree/don't know	Your comment

3. Do you have comments on any other aspect of the Neighbourhood Plan

Page Number	Your comment

4. Do you have any comment on the evidence documents supporting the Neighbourhood Plan including the Local Green Space report, the Landscape Appraisal or the Demographic and Socio Economic Review 2017

Supporting Document	Agree/disagree/don't know	Your comment

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 13

Witchford Neighbourhood Plan

Report on public information drop-in session Wednesday 19th June 2019 3-7pm St Andrews Hall Main Street Witchford .

5. Purpose
The drop-in session was intended as a tie-in with the formal Regulation 14 Consultation on which ran from 12th June – 25th July 2019. Full copies of the Consultation Draft Neighbourhood Plan and the Consultation Draft Local Green Spaces Report were available for inspection, along with headline summaries of the policies. Enlarged copies of the policy maps were placed on the walls of the hall for ease of inspection. Several members of the Parish Council were on hand throughout the session to answer questions from the public. The Parish Clerk was also present throughout the session.
2. Publicity
The date, time and venue of the drop-in session was advertised on a flyer delivered to every household in Witchford and on the online version. The Parish Council also paid for a full-page advert in the village magazine Fenscene, which is delivered to every house in the village.

Details about the drop-in session was posted on the Parish Council website and also repeatedly on the Witchford Residents Facebook page.

Banners and boards advertising the survey and the drop-in session were also produced and placed around the village.
3. Attendance
An attendance log was maintained throughout the four-hour period of the drop-in session 3 – 7pm. 40 individual adults attended. From observation, the attendees appeared to be older (retired?).
4. Responses
Attendees were requested to provide their comments using the Regulation 14 Consultation comments form. This was to try to focus respondents' on the Consultation Draft text rather than making more general comments, and to assist with analysing the comments on each individual policy.



Witchford Neighbourhood Plan Consultation Statement

APPENDIX 14

Dear Sirs,

Witchford Neighbourhood Plan Consultation Draft 12th June – 25th July 2019

Witchford Parish Council invites your comments on its Consultation Draft Neighbourhood Plan.

Witchford Parish Council is undertaking a formal pre-submission consultation on the Witchford Consultation Draft Neighbourhood Plan as required by the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended).

The full draft Neighbourhood Plan, a summary of the policies and a copy of the comments form can be found on the Witchford Parish Council website at

<http://witchfordpc.org/neighbourhood-plan/>

and all the supporting documents can be found at

<http://witchfordpc.org/neighbourhood-plan/plan-documents/>

Please send any comments you may have to Witchford Parish Council either by email at witchfordparishcouncil@eastcambs.gov.uk or by post to the address below. Please either use the comments form or refer to the relevant policy and/or section of the Neighbourhood Plan in your reply. Please send your comments by 25th July 2019.

Yours faithfully,

Mrs A Hodges
Clerk to Witchford Parish Council
01353 664427
witchfordparishcouncil@eastcambs.gov.uk
witchfordpc.org

Witchford Parish Council does not retain any personal information about any person without that person's express consent, unless it is a legal requirement to do so. Witchford Parish Council does not share or disclose personal information about any person to any third party without that person's express consent, unless it is a legal requirement to do so. While recognising that no online service is 100% secure, Witchford Parish Council takes reasonable measures to protect information about you against unauthorized access, use, alteration, or destruction. Witchford Parish Council complies with Data Protection legislation.

Witchford Parish Council does not act upon anonymous information, therefore any requests for action or for matters to be considered by the Parish Council on its agenda must be accompanied by a name and address. All personal details provided will be redacted when circulated to Parish Councillors and if considered in public at a Parish Council meeting. All personal details provided will be deleted immediately they are no longer required for considering the matter in question. Personal details such as a name, email address and phone number may be used by the Parish Council to contact you about your query and for no other purpose.



Witchford Neighbourhood Plan Consultation Statement

APPENDIX 15



4th June 2019

SAMPLE ADDRESS

Dear Mr XXX,

Witchford Neighbourhood Plan Consultation Draft 12th June – 25th July 2019

Witchford Parish Council invites your comments on its Consultation Draft Neighbourhood Plan.

Witchford Parish Council is undertaking a formal pre-submission consultation on the Witchford Consultation Draft Neighbourhood Plan as required by the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended).

The full draft Neighbourhood Plan, a summary of the policies and a copy of the comments form can be found on the Witchford Parish Council website at

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Please send any comments you may have to Witchford Parish Council either by email at witchfordparishcouncil@eastcambs.gov.uk or by post to the address below. Please either use the comments form or refer to the relevant policy and/or section of the Neighbourhood Plan in your reply. Please send your comments by 25th July 2019.

Yours sincerely,

Mrs A Hodges
Clerk to Witchford Parish Council

Clerk: Mrs A Hodges 88 West Fen Road Ely Cambs CB6 3AA
01353 664427
witchfordparishcouncil@eastcambs.gov.uk

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 16

Witchford Parish Council would like to thank all those residents of Witchford who have contributed to this work and for their constructive comments, which will help enhance and improve the Neighbourhood Plan.

Regulation 14 Consultation Responses - RESIDENTS

Policy	Respondent	Comment	Neighbourhood Plan response	Change to Plan?
SS1 Spatial Strategy	12	Disagree. V concerned about safe exit from Sedgeway.	Noted. Improved safety and ease of access at this junction is a key aspiration for Witchford Parish Council. While highway matters are not within the scope of the Neighbourhood Plan, the Parish Council will continue to pursue this through other relevant channels.	
	20	OK but need to ensure that WNP H2 policy is water-tight.	Noted.	
Map 5 Inset Map	Verbal comment at Drop-in session	Coloured blocks showing housing allocations in red and LGS and Green Wedge in green difficult for persons with red-green colour-blindness to differentiate.	Amend map to show allocations and LGS/Green Wedge with hatching.	Yes. Proposed change 1.
LC1 Landscape and Settlement	20	On the last point I suggest the amendment in bold red: "Witchford shall remain an island settlement; the northern slopes, <u>the western and eastern entry points</u> , and the low-lying landscapes which surround Witchford shall remain open"	This change would not make sense since the western and eastern entry points into the village are not open but built-up. The Witchford Landscape Appraisal does identify as key distinguishing feature of Witchford that the village gateways are not defined by road junctions or roundabouts and as a result of this the settlement retains a rural character with	

			junctions to subsidiary routes occurring within the fabric of the settlement. The WLA recommends the extension of the village gateways into the wider landscape to be avoided.	
LC2 Witchford Green Wedge	5	Very much agree with this policy. So important we keep this village separate from Ely.	Noted.	
LC2 Witchford Green Wedge	14	<p>If Witchford becomes put under pressure again to expand should the Parish Council consider the top part of the green wedge to be developed (not village hall area) in a suitable manner, large houses with good frontage at the village roadside, smaller affordable homes to the back land. Is near roundabout and does not need to go through village to get to Ely.</p> <p>Land near college protected for development of expansion of village college (Meadow Close)</p>	<p>This proposal is contrary to the purpose of the proposed Area of Separation.</p> <p>This site is currently outside the village development envelope as shown in the Plan.</p>	
LC2 Witchford Green Wedge	33	<p>'Development proposals will be permitted in the Witchford Green Wedge (as shown on Map 8) where proposals:'. This is saying that as long as ONLY these three conditions are met the development will be permitted. Surely we must have an overriding condition that the proposals must also comply with Witchford's other policies.</p> <p>It is not the 'development proposals' that will be permitted, but the development. (omit 'proposals').</p>	<p>This policy is being reviewed following a number of representations during the Regulation 14 Consultation.</p> <p>The plan will be read as a whole. All planning policies apply (as relevant) to each planning application.</p>	Yes. Proposed change 3.

			Noted.	
GI1 Public Rights of Way	1	At 5.4.2 include definitions of the different categories of public rights of way, for public information.	Agreed.	Yes. Proposed change 4.
GI1 Public Rights of Way	15	Agree. Policy enhanced by 'Diversion of Rights of Way will be resisted'.	Developers have the right to apply to divert roads under s257 TCPA90. The Plan seeks to protect the amenity value of public rights of way e.g. views, aesthetic value, environment and biodiversity.	
	19	Consideration should be also given to providing a means of crossing or underpassing A roads where public rights of way are intersected. This would enable freer movement of people, dogs, horses away from the confines of the A road 'cage' around the village.	The Parish Council agrees with the aspiration but this is not deliverable within the Neighbourhood Plan. Add to list of 'Other schemes not deliverable by Witchford Parish Council but which the Parish Council will support or lobby for' at paragraph 6.4. Small scale works such as bollards and signing could be met through CIL contributions – add to 'CIL Funded Project List' at paragraph 6.3.	Yes. Proposed change 15.
GI2 Local Green Space and Local Green Space Report	2	<p>'Sandpit Drove' should include the continuation of BY#11 where it adjoins Manor Road and known as Pamby's Plantation.</p> <p>It should include the Safeway linking the two parts of BY#11 which was created by local insistence when the bypass was built. See photo attached</p>	<p>The Parish Council must consider whether these sites meet the criteria for Local Green Space set out in NPPF</p> <p>The criteria for Local Green Space designation are set out in paragraph 100 of the NPPF. This states the green space should be:</p> <ul style="list-style-type: none"> • in reasonably close proximity to the community it serves; • demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic 	

		 <p>Include New Pond and surrounding area.</p>	<p>significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <ul style="list-style-type: none"> •local in character and not an extensive tract of land. <p>It is not considered that the safeway would meet the criteria for designation. Pamby's Plantation is considered to be potentially suitable but considerable work would need to be carried out to collect and analyse evidence to demonstrate this. This work can be carried out at the first review of the Neighbourhood Plan.</p> <p>The Parish Council agrees that New Pond may qualify for designation; however, this needs to be demonstrated by evidence. This work can be carried out at the first review of the Neighbourhood Plan.</p> <p>Elm Close-and Ward Way are not considered likely to meet the NPPF criteria for designation. However, assessment of these sites against the NPPF criteria could be carried out at the first review of the Neighbourhood Plan.</p> <p>These lanes are public byways, and are not considered likely to meet the requirements of the NPPF.</p>	
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		<p>Elm Close Green & Ward Way Green should be included with the 'Field End and Wheats Close Open Space'.</p> <p>Include Granny's End, Dunham's Lane with the linking Safeway (all now within the revised Witchford envelope).</p> <p><u>LGS Report</u> Reference 3.2 Sandpit Drove (page 5)</p> <ul style="list-style-type: none"> - Include a mention that after local insistence the Safeway was created to link the two parts of Byway 11 separated when the by-pass was built. - Include that access along Sandpit Drove is required by the Internal Drainage Board for maintenance of the Grunty Fen Drain. <p>Reference 3.3 (page 7)</p> <ul style="list-style-type: none"> - Add to 'Old Scenes Drove' 'aka Holts End'. <p>Reference 3.10 Manor Road Allotments (page 14)</p> <ul style="list-style-type: none"> - Include that the initial 20# 5-pole plots were increased to 30 due to demand. 	<p>Noted.</p> <p>Noted.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Agreed.</p>	<p>Yes. Proposed change 5.</p>
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		<p>Reference 3.12 Field End and Wheats Close Open Space</p> <p>- I'm not sure 'Field End' is the correct designation. 'Orton Drive & Wheats Close' would be more appropriate as the Green is part of the Reason Homes development not the Wilcon development.</p>		
GI2 Local Green Space	3	I am concerned that development does not take place on our green spaces. As a member of the Open Spaces Group we work hard to protect and maintain, please don't let them be destroyed.	Noted.	
GI2 Local Green Space	4	As a member of the Open Spaces Group I am worried that areas of the village and surrounds that we have developed and maintained over the last 30 years may be built on.	Noted.	
GI2 Local Green Space	5	Thank you for this designation. These green spaces are what help to make Witchford a pleasant place to live.	Noted.	
GI2 Local Green Space	10	<p>Local green space/green wedge should be allocated at both ends of the village – on western edge to preserve the identity of both Witchford and Wentworth and their rural character.</p> <p>Also if the village wishes to retain green space owned by private parties then it should be paid for by the village at market value.</p>	<p>The wording of the supporting text to this policy is to be reviewed including referencing LCA as appropriate.</p> <p>Noted.</p>	



GI2 Local Green Space	13	Green area at rear of Ward Way should be included.	Ward Way is not likely to meet NPPF criteria for designation. However, assessment of this site against the NPPF criteria could be carried out at the first review of the Neighbourhood Plan	
GI2 Local Green Space	20	<p>I would suggest adding the field south of Sutton Road to this list. It provides an important open aspect as you enter the village from the west. It also typifies the rural links of the village as it is grazed by cattle from late summer through to winter, and offers a beautiful south facing aspect towards surround countryside for the residents of Sutton Road. Furthermore it has been a location for numerous leisure activities when cattle are not present (kite flying, jogging around the perimeter, ball games etc).</p> <p>Is site reasonably close proximity to the community it serves? - Yes it is adjacent to the residents of Sutton Road</p> <p>Is it demonstrably special to a local community and does it hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife? - Yes - it has been grazed by cattle from late summer through to winter for around 20 years, offering a close and characterful link with the rural community and landscape. When not being grazed it is often used for leisure</p>	<p>The Parish Council must consider whether this site meets the criteria for Local Green Space set out in NPPF</p> <p>The criteria for Local Green Space designation are set out in paragraph 100 of the NPPF. This states the green space should be:</p> <ul style="list-style-type: none"> •in reasonably close proximity to the community it serves; •demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and •local in character and not an extensive tract of land. <p>The site is not considered likely to meet the NPPF criteria for designation. However, assessment of this site against the NPPF criteria could be carried out at the first review of the Neighbourhood Plan.</p>	

		<p>activities such as kite flying, jogging, and ball games. Furthermore it defines Witchford to people entering the village from the west by offering a clear open fenland aspect leading gently in to the housing areas. The site is highly valued by the community.</p> <p>Is it local in character and not an extensive tract of land? - yes it has clear hedged boundaries and a single entry/exit point to Sutton Road.</p>		
GI2 Local Green Space	33	<p>Reference to 'Witchford Local Green Spaces Report (May 2019).' There has been a lot written about the Local Green Spaces.....could not some short summary be included in the NP rather than just a reference to another document that may or not be easily accessible?</p>	The wording of paragraph 5.4.4 will be reviewed.	Yes. Proposed change 6.
Policy Map 8: Views and Landscape extending into the village	20	<p>The views at the west end of the village at Sutton Road need an additional "red eye" for the aspect into the village towards the field south of Sutton Road. The field rises to the South and creates a clear indication of the rural location, helping to define the village.</p>	The LCA identifies this as one of the four areas where the countryside enters into the village. This is addressed in policies SS1 and LC1 and policy map 8.	
GI3 Development and Biodiversity	33	<p>This policy only refers to Local Plan ENV 7: Biodiversity and geology, and although flood measures are included, Policy ENV 8: Flood risk and SuDS are not specifically mentioned.</p> <p>Intent. This might be expanded to include Policy ENV 8: Flood risk:</p> <ul style="list-style-type: none"> - 'To complement the policy approach taken in the Local Plan through policies ENV 	Add reference to ECDC Local Plan Policy ENV8 Flood Risk to paragraph 5.7.7 Intent for Policy IC4 Flooding	Yes. Proposed change 12.

		7: Biodiversity and geology, and ENV 8: Flood risk.'		
GI3 Development and Biodiversity	33	<p>Context and justification. Provide a reference here to the SuDS explanatory text of April 2019 (that's if it's available to view?).</p> <ul style="list-style-type: none"> - Suggest for the following para: 'As development proposals come forward.....parish. This could be through retaining or restoring hedgerows and ponds as well as through site drainage features that benefit biodiversity (green roofs and other elements of Sustainable Drainage Systems (SuDS)).' - Comments on the following para: 'The NP supports the recommendations set out in the Wildlife Trust's 2018 publication 'Homes for People and Wildlife'. The measures which new development proposals could incorporate as a means to enhancing biodiversity in the parish are informed by the recommendations set out in that report. Applicants are also encouraged to refer to this.' Firstly this comes from the national body The Wildlife Trusts, and so should read 'The Wildlife Trusts' '. Secondly what happened to the summary principles as proposed in the letter from the Open Spaces Group (A New Way to Build, Aug 2017)? It's disappointing that this appears not to be mentioned, despite its being adopted by the Parish Council. This summary may be 	<p>Noted. Amend reference to <i>Sustainable Drainage Systems (SuDS)</i>.'</p> <p>so should read ' The Wildlife Trusts' ' – amend text.</p> <p>This document added to Appendix 1.</p>	Yes. Proposed change 7.

		easier/simpler as an in-document alternative to the reference provided that applicants are encouraged to refer to.		
GI3 Development and Biodiversity	33	<p>The box lists mainly biodiversity elements with some SuDS features but without any explanation of sustainable drainage either in the box or in the following text. Support for SuDS has been a key feature of PC policy, and I wrote an explanatory text on SuDS at the request of the PC, but this or something similar does not appear. Without some explanation most readers will not know what SuDS are or how they can benefit not only flood reduction but also biodiversity. May I suggest something like the following for the Box, which retains the strong connection between SuDS and biodiversity:</p> <p><i>Policy WNP – GI3 Development and Biodiversity</i> <i>Development must avoid adverse impacts on biodiversity and provide net gains in biodiversity by creating, restoring and enhancing habitats for the benefit of species. In doing so, applicants must seek to retain and where possible enhance the network of species and habitats currently present in the parish.</i> <i>Development proposals are more likely to be supported where they enhance biodiversity in the parish through designing in green infrastructure measures as part of the design and layout of a scheme. Such measures</i></p>	<p>This document added to Appendix 1.</p> <p>Agree new wording for policy GI3 as follows:</p> <p>Development should avoid adverse impacts on biodiversity and provide net gains in biodiversity by creating, restoring and enhancing habitats for the benefit of species. In doing so, applicants must seek to retain and where possible enhance the network of species and habitats currently present in the parish.</p> <p>Development proposals are supported where they enhance biodiversity in the parish through designing in green</p>	Yes. Proposed change 8.



		<p>include:</p> <ul style="list-style-type: none"> • Trees, hedgerows, water and other habitats integrated into the development; • Wildflower verges along roads and formal open spaces; • Lighting designed to avoid disturbing wildlife; • Bat roosts and bird boxes; • Features and corridors to help invertebrates, reptiles, hedgehogs and other mammals. <p>Development proposals must also include measures to decrease flood risk that are in accordance with Sustainable Drainage Systems (SuDS) principles and which will enhance biodiversity:</p> <ul style="list-style-type: none"> • Wildlife-friendly green roofs and walls; • Permeable driveways; • Swales and rain gardens enhancing landscape, connectivity and biodiversity; and • Attenuation ponds suitable for wetland wildlife. 	<p>infrastructure measures as part of the design and layout of a scheme. Such measures include:</p> <ul style="list-style-type: none"> • Trees, hedgerows, water and other habitats integrated into the development; • Wildflower verges along roads and formal open spaces; • Lighting designed to avoid disturbing wildlife; • Bat roosts and bird boxes; • Features and corridors to help invertebrates, reptiles, hedgehogs and other mammals. <p>Development proposals should also include measures to decrease flood risk that are in accordance with Sustainable Drainage Systems (SuDS) principles and which will enhance biodiversity. Such measures include:</p> <ul style="list-style-type: none"> • Wildlife-friendly green roofs and walls; • Permeable driveways; • Swales and rain gardens enhancing landscape, connectivity and biodiversity; and • Attenuation ponds suitable for wetland wildlife. 	
H1 Housing Mix	12	Agree. More bungalows – more greens for common use. Parking that's realistic.	Noted.	
H1 Housing Mix	33	'Residential development that contributes to meeting existing and future needs of the village will be supported.' Some further condition must be applied for conformance with other WNP Policies.	All development proposals need to accord with all policies in the Plan as applicable to each site, unless material conditions apply.	
H2 Affordable Housing	5	Affordable housing will help keep young people in the village and stop it being a	Noted.	

		dormitory for Cambridge.		
H2 Affordable Housing	33	Context and reasoned justification. 'The Demographic and Socio-Economic Review families. The number of people with a Witchford connection on the district's housing register was 26 as at November 2017.' Is there no update on this figure?	Noted. The Parish Council will inquire again with the District Council Housing Team for a more recent figure.	
H2 Affordable Housing	12	Agree. CLT standards – of density and people focussed.	Noted.	
H2 Affordable Housing	10	<p>No need for more exception housing at all as provided in existing developments. There are 400 houses already agreed including affordable/social.</p> <p>Ease of access to village centre is critical.</p> <p>No leasehold. When sold. CLT to preserve in perpetuity.</p> <p>On all sites with planning approval, village must hold the line when alternative usually more dense plans are submitted, changing the pre-agreed design.</p>	Rural exception housing is not the same as affordable housing provided on market schemes. Rural exception housing is provided in perpetuity for people with a connection to Witchford.	
H2 Affordable Housing	20	"identified local needs" does not appear to have data to indicate what these needs are. Developers will almost certainly argue that local needs are not satisfied. We need data to demonstrate that needs are already sufficiently met with the existing plans in H1, H2, and H3 proposals.	'Identified local needs' refers to affordable housing for people with a connection to Witchford. The wording of this policy will be reviewed.	Yes. Proposed change 9.
H3 Housing Design	33	'Building for Life 12' assessment is explained in the text and a link provided. However, I couldn't find any details on this link. 'A New	Add sentence to 5.5.5. Intent ' This policy is intended to complement policy GI3 Development and Biodiversity'.	Yes. Proposed change 10.

		Way to Build' does not have the same promotion, despite this approach having been adopted by the Parish Council. 'Building for Life 12' does not appear to have 'green' credentials.	Add sentence to 5.4.5 Intent " This policy is intended to complement policy H3 Housing Design.	
Site Allocation WFDH1	8	1) no specific measures are mentioned to reduce air and noise pollution from the A142. This is a serious problem with the site. 2) No mention is made of protecting existing landscape features such as hedges and trees on this site. In consequence two mature trees have already been felled without authorisation.	Noted.	
Site Allocation WFDH1	11	Agree, but good luck enforcing any developers plans. Bovis at Field End have vandalised the hedge, uprooted TPO trees and applied for a second road (unnecessary) onto the site – granted by highways – that no-one knew about and whilst temporary will last until 2022 – 31/2 years to build just 168 homes.	Noted.	
Site Allocation WFDH2				
Site Allocation WFDH3				
IC1 Infrastructure and Community Facilities	10	Agree	Noted.	
IC1 Infrastructure and Community Facilities	11	Agree. The traffic calming employed in Eye Cambs could possibly be copied for Witchford	Noted. Witchford Parish Council agrees with the aspiration to improve road safety within the village and is implementing its transport plan for Witchford as funding allows. This will be	

			clarified by adding traffic schemes to paragraph 6.3 CIL Funded Project List.	
IC2 Witchford Village Hall and Recreation Ground	10	Agree	Noted.	
IC2 Witchford Village Hall and Recreation Ground	12	<p>Does local people mean Witchford or Ely? i.e. football club dominated by Ely residents.</p> <p>Any development of village hall should be preceded by 1. Sufficient car parking 2. Separate football pavilion.</p> <p>Not diverse enough sports at rec grounds – just football dominated – need tennis/netball court and trim trail.</p>	<p>This is addressed in the first bullet point of the policy.</p> <p>Add additional bullet point to policy IC2: <i>'it must be demonstrated how additional demand for car parking will be accommodated within the allocated land'</i> or similar wording</p>	Yes. Proposed change 11.
IC2 Witchford Village Hall and Recreation Ground	33	<p>Intent. The measures set out to provide extra car parking space, disabled parking etc, and moving the current changing rooms away from the village hall are surely still proposals. Should the NP be setting out in stone measures that may change over the following year or more?</p>	The policy is worded to be future-proofed, while the wording of paragraph 5.7.3 describes the intent as currently proposed.	
IC3 Protection of Witchford's Community Facilities	13	Where are the opportunities for doctors surgery/pharmacy or other community needs.	Noted. It is the responsibility of health providers to strategically plan provision of health care services. Health providers have not indicated a need or strategy to provide additional premises within the NP area so it would not be effective to find space for this as part of the plan. The NP does recognise the needs for wider community infrastructure and this is reflected in Policies IC1, IC2, IC3. See also	

			paragraph 6.4 in the plan.	
IC4 Flooding	10	Agree. Flood risk management is essential for especially run-off.	Noted.	
IC4 Flooding	15	Agree. Policy enhanced by adding 'be accompanied by detailed proposals for future maintenance'.	Agreed. Amend policy bullet point 2 by adding 'including detailed proposals for future maintenance' to end of sentence.	Yes. Proposed change 13.
T1 Getting around the village	33	Paras 2 and 3. Replace regularly/regular with frequently/frequent (3 occasions) as each activity is not regular.	Agreed.	
C1 Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes	19	<p>Safe crossing of A10 and A142 is required <u>now</u>. People who cannot or who chose not to travel by car to get to their local amenities are risking their lives and those of others in trying to cross the A142 and the Lancaster Way roundabout and the A10 at the intersection with the A142. We need a safe crossing now while future strategy is developed.</p> <p>I agree wholeheartedly with this proposed policy although I would stress the urgent need to deliver a means of safely crossing both the A142 (at the Lancaster Way Roundabout) and the A10 (at its intersection with the A142) now to avoid accidents at these vital crossing places.</p> <p>Attempting to cross the A142 or the A10 at the points where the Witchford and Ely Cycle/Pedestrian route is intersected by these two 'A' roads is like playing a dangerous game of Russian roulette. This is particularly the case at rush hour times when</p>	Noted. Securing the provision of a safe crossing of the A10 at this location is the objective of this policy.	

		<p>motorists are already queueing and are frustrated to be held up. Their full attention is focussed on trying to advance in the traffic rather than on noticing or avoiding pedestrians and cyclists.</p> <p>I invite anyone who has a role within transport planning to join me in trying to cross these roads with a bicycle, dog, child, push chair or on foot. This would allow them to experience, first hand, the unacceptable level of risk that people are having to take in order to cross these busy and often congested A roads.</p> <p>Ely Leisure Village, Ely City Centre and Ely Station all lie within 2.5-3.0 miles of the centre of Witchford. As there are designated cycle/pedestrian routes all the way from Witchford to these key amenities, it is imperative that before any further thought be given to addressing traffic congestion, or aiding traffic flow at the Lancaster Way or A10 roundabouts, provision be made as a matter of urgency for cycles and pedestrians to safely cross these two 'A' roads. Not only are the lives of people trying to cross these 'A' roads significantly endangered but also, the safety of the motorists at these two crossing points is being severely compromised. Invariably, crossing is only possible when a motorist 'allows' it by stopping in rush hour traffic to facilitate pedestrians and bicycles crossing. Other</p>		
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		<p>motorists at the busy intersection do not expect to find themselves unexpectedly stationary whilst in traffic that was flowing only a moment ago. Tempers fray and judgement is compromised.</p> <p>Traffic flow would be eased in a sustainable way if it were possible for many more journeys to be taken by foot or bicycle. Only when adults and children can safely use the cycle/pedestrian routes that have been provided will the take-up of these facilities be truly adopted by the people of Witchford and by the residents of the villages lying further out from Ely. Being able to travel small distances safely by foot or by bicycle would help reduce pollution and associated health issues as well as providing people with the option of improving their health by leaving their cars at home.</p> <p>One more journey walked, jogged or cycled is one less car on the road!</p>		
C1 Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes	33	A safe cycle route already exists from the A10/A142 roundabout in the green strip alongside the A10.	Amend map accordingly	Yes. Proposed change 14.
E1 Support for small business development	10	Agree, but how it is done will be critical, ensuring funding is not risked on poorly designed business property that may not be wanted e.g. done in Manea and failed.	Noted.	

E1 Support for small business development	12	Agree but that means big houses	Noted.	
E2 Employment and Commercial Development	12	Disagree. No development at Sedgeway until a roundabout or lights for safer access.	Noted. Improved safety and ease of access at this junction is a key aspiration for Witchford Parish Council. While highway matters are not within the scope of the Neighbourhood Plan, the Parish Council will continue to pursue this through other relevant channels.	
Appendix 1		<p>As noted earlier, the summary of 'A New Way to Build' and the SuDS explanatory note are not included.</p> <p>- Not all the documents listed appear accessible on the PC website, e.g. the Database of Witchford green infrastructure Report.</p>	<p>All the accompanying documents have been available via the WPC website throughout the whole period of the public consultation,.</p> <p>Because of the number of supporting documents the website provides links to either a) the google drive page where the documents can be opened and/or downloaded by any person, or b) third party websites e.g. CPERC database.</p>	
General Comments	3	I believe that the sooner we have the plan, the sooner we can stop developers building on every open space in the village. We need houses to be built but decisions on where these should be, should be made in the interest of the village, not where-ever landowners/developers think these should go	Noted.	
General Comments	4	We need housing but we also need a plan so that villagers, via the Parish Council, can guide developers as to where those houses are placed and so protect areas which are well known as village amenities.	Noted.	
General	5	Fully in favour of all Visions and Objective.	Noted.	

Comments		Good polices that can only benefit the village.		
General Comments	6	All very commendable and having read the document I agree with it. No further comments.	Noted.	
General Comments	8	The Neighbourhood Plan is a good statement of residents' aspirations for the village. My concern, which I am sure is shared by others, is that it will be largely ignored by planning authorities, development corporations, or by contractors carrying out the work on various projects. There seem to be no proper mechanisms for holding such bodies to account.	Noted.	
General Comments	9	I would like to see a safe drop-off/pick-up site at the side of the primary school with a crossing on Main Street	Noted.	
General Comments	12	LCA is particularly good.	Noted.	
General Comments	15	A balanced document	Noted.	
General Comments	32	We need to protect our village and agriculture. So I agree with all the policies.	Noted.	
General Comments	23	Broad agreement, very broad agreement of the plan. It concerns me that outline planning can be approved but immediately afterwards prospective builders can immediately change the plan – usually for more congestion. I have no objection to people taking time off from the office to work from home a couple of days a week but not to run a business from private houses – it creates more traffic often	Noted. The Parish Council agrees with this concern and	

		of large vehicles and [?] number of vehicles having to be parked overnight. Infrastructure and facilities need to come before houses and increasing population.	it is addressed in the wording of policy E1.	
Unreferenced comment	17	<p>One concern is about the tightly packed proposed modern housing with small gardens and long term effects on people's mental health. Also increasingly nowadays people isolate themselves at home with tech etc.</p> <p>I wondered about including a 'community garden' in your planning. I'm not sure where I heard that 2 or 3 allotments may be free at present. A community garden could go some way to alleviate modern pressures.</p>	<p>Noted.</p> <p>Add to list of CIL funded projects at 6.3.</p>	Yes. Proposed change 16
Unreferenced comment	17	The Baptist Church is empty and nowadays not used at all. Even the Foodbank storage has moved from it. What about the Parish Council taking it over for the community purposes. Little Downham have a busy community hub and Witchford would benefit from something similar. I live in Granta Close and there is nothing at this end of the village and it could be welcome place to new people coming to the village.	Whilst this is not within the remit of the Neighbourhood Plan, the Parish Council has applied to ECDC to have the Baptist Church registered as Asset of Community Value.	
Unreferenced comment	18	<p>I would like to submit my comments about the Witchford Neighbourhood Plan.</p> <p>First I would like to send my apologies for not making the meeting as I was away that week.</p> <p>However, I really want to put my point of</p>	Noted.	



	<p>view across being a resident in the village.</p> <p>I have lived in the village for just over 3 years with my partner moving up from Lincolnshire for work.</p> <p>I really liked the quality and integrity of the village we moved into, it was great the village had great character and lots of green areas to walk and exercise.</p> <p>However, 3 years down the line it has been an absolute free for all in terms of building permission being granted. No thought has been given to the current residents or the character and identity of the village.</p> <p>I'm personally horrified at all the building that has been granted and can't believe the village is not protected. It really upsets me that so much has been granted. It is so out of context to the mean average across the country for size of the village.</p> <p>All this building being granted with no infrastructure such as primary schools and doctors has been put on the map. There aren't any more shops or anything. It is just mindless residential dwelling that have been granted.</p> <p>I think the Parish Council need a very firm stance on stopping the developers to protect</p>		
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		<p>the village and it's residents before it is too late. It's a duty of care!</p> <p>I agree with all the objectives laid out in the vision statement but can you make sure that they get set in place and stop any further developments for at least 5-10 years.</p> <p>I would like to be kept update on what is going on with these plans and the progress being made, and hopefully a strong plan to keep the developers away can be implemented quickly.</p>		
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Witchford Neighbourhood Plan Consultation Statement

APPENDIX 17

Regulation 14 Consultation Responses – Statutory Consultees.

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
SS1 Spatial Strategy	27 East Cambridgeshire District Council	<p>The draft Witchford Neighbourhood Plan proposes changes to the current Development Envelope (i.e. the boundary as set by the 2015 Local Plan) for Witchford village; the boundary is extended to include site allocations, thereby providing sufficient land to meet (or exceed) the indicative housing requirement.</p> <p>It may be helpful to applicants and decision-makers to clarify this change in the supporting text to WNP SS1. Once made, the Witchford Neighbourhood Plan's Development Envelope for Witchford village should be treated as up-to-date and, in effect, replace the Development Envelope set by the Local Plan 2015.</p>	Agreed	Yes. See Change 26
	28 Anglian Water	Reference is made to 'other uses' being appropriate in countryside location although this term is not defined. It would be helpful to clarify that this would include essential infrastructure provided by Anglian Water for our customers.	Noted. I don't think this is necessary but up to group.	
LC1 Landscape and Settlement Character	7 Witchford Post Office	Agree	Noted.	
	27 East Cambridgeshire	To provide greater clarity for applicants and decision-makers, some elements of the policy may benefit from amendment. For example, how	Agreed.	Yes. See change 2

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
	District Council	<p>should impacts on the 'strong connection between settlement and countryside', 'key views from the edge of Witchford village' or the openness of the northern slopes be assessed?</p> <p>The policy could require applicants to supply evidence of a proposal's likely visual impacts, where the proposed site effects a sensitive location in Witchford's landscape. To assist applicants in making proposals which accord with WNP LC1, the policy should 'signpost' to the Witchford Landscape Character Assessment.</p>		
LC2 Witchford Green Wedge	16 Littleport & Downham Internal Drainage Board	<p>The Board fully supports this proposal. The Board's Grunty Fen Main Drain flows through this site. This is a vital watercourse that allows Grunty Fen area to drain to the Board's Oxloode Pumping Station.</p> <p>Allowing development in this area would inevitably impact on the Board's access to maintain the watercourse. It is also likely that how we maintain the Drain would also have to change. For example, weed and silt from the channel is currently placed on the adjacent land, something we doubt we would be able to do if the area was developed.</p>	Noted.	
	7 Witchford Post Office	Agree. Traffic leaving the village at rush hours times is awful. Development here would make this even worse!	Noted.	
GI1 Public Rights of Way				
GI2 Local Green	7	Agree		



Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
Space	Witchford Post Office			
GI3 Development and Biodiversity	7 Witchford Post Office	Agree		
Housing Requirement	27 East Cambridgeshire District Council	<p>The National Planning Policy Framework (NPPF) places a duty on local planning authorities to set out a housing requirement for designated Neighbourhood Areas through its strategic policies. The Local Plan 2015 pre-dates the current NPPF and therefore does not set housing requirements for the district's Neighbourhood Areas.</p> <p>The NPPF1 requires local planning authorities to provide an indicative housing requirement figure, if requested to do so by the neighbourhood planning body. Witchford Parish Council requested ECDC set an indicative housing requirement figure for the Witchford Neighbourhood Area and ECDC duly provided a figure of 252 dwellings in the period 2018 to 2031.</p> <p>The draft Witchford Neighbourhood Plan includes draft policies and site allocations which will provide development at a rate which exceeds the indicative housing requirement. ECDC commends Witchford Parish Council's recognition of the need to deliver housing development.</p>	Noted.	
H1 Housing Mix	27 East Cambridgeshire	The policy requires new development to meet the optional technical housing standard M4(2) for accessible and adaptable dwellings. The	The supporting text will be updated. Awaiting further information.	Accepted. The supporting text now refers to the evidence supporting this



Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
	District Council	government's Planning Practice Guidance requires optional technical standards to be justified by evidence of likely future need for housing for older and disabled people; size, location, type and quality of dwellings needed to meet specifically evidenced needs; the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability. The 'Context and Reasoned justification' accompanying the policy goes some way to satisfying this, but there may be a need for additional evidence, for example in terms of impacts of the proposed policy on development viability.		policy
H2 Affordable Housing	7 Witchford Post Office	Agree. With house prices now ridiculous something is needed – 50/50 ownership schemes are a consideration – we need real affordable housing that attracts families, as it is that demographic that keeps our facilities going.	Noted.	
Site Allocation WFDH1	28 Anglian Water	We note that it is proposed to allocate three sites for residential development which currently have with the benefit of planning permission. Anglian Water has no objection to the principle of residential development on the above site. Anglian Water is supportive of Policy WFDH1 as it states that development proposals for this site should incorporate a surface water drainage scheme based upon sustainable design	Noted.	

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
		principles. The use of Sustainable Drainage Systems (SuDS) would help to reduce the risk of surface water and sewer flooding.		
Site Allocation WFDH2	28 Anglian Water	<p>We note that it is proposed to allocate three sites for residential development which currently have with the benefit of planning permission. Anglian Water has no objection to the principle of residential development on the above site.</p> <p>The above policy refers to land drainage but not surface water drainage and the provision of SuDs as set out in policies WFDH1 and WFDH3. For consistency we would ask that the following wording be included in Policy WFDH2:</p> <p>‘Incorporation of a surface water drainage scheme for the site based on sustainable drainage principles and which delivers biodiversity benefits.’</p>	Agreed.	See Change 23.
Site Allocation WFDH3	28 Anglian Water	<p>We note that it is proposed to allocate three sites for residential development which currently have with the benefit of planning permission. Anglian Water has no objection to the principle of residential development on the above site.</p> <p>Anglian Water is supportive of Policy WFDH3 as it states that development proposals for this site should incorporate a surface water drainage scheme based upon sustainable design principles. The use of Sustainable Drainage</p>	Noted.	

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
		Systems (SuDS) would help to reduce the risk of surface water and sewer flooding.		
IC3 Protection of Witchford's Community Facilities	7 Witchford Post Office	Agree. This should state Post Office as well as shop.	Agree.	See Change 27
IC4 Flooding	16 Littleport & Downham Internal Drainage Board	<p>The Board fully supports the adoption of this policy.</p> <p>Though the majority of the village is outside the Board's District, through indirect run-off, the village benefits from the work of the Board, through our management of the Main Pumped Drain or High Level Catchwater systems, which discharge directly to Main River systems.</p> <p>New development applications need to be accompanied by a flood risk assessment, which must incorporate the surface water management for the site. For discharges into the Board's watercourses, the greenfield run off rate has to be limited to 1.1 litres/second/hectare. This figure is based on the design capacity of the Board's system.</p> <p>It is vital that the maintenance of any sustainable drainage systems is agreed for the lifetime of the development.</p>	Noted.	
IC4 Flooding	28 Anglian Water	Anglian Water is generally supportive of Policy H5 although the use of Sustainable Drainage Systems (SuDS) should not be limited to those which have been specifically at risk from surface water flooding.	Agreed	See Change 13

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
		<p>SuD's should be utilised wherever possible with surface water discharge from new development proposals to the public sewerage network only being allowed in exceptional circumstances.</p> <p>We would therefore ask that Policy H5 be amended to make it clear that SuDs is the preferred method of surface water disposal including locations outside of areas identified as being at risk of surface water flooding.</p>		
T1 Getting Around the Village	7 Witchford Post Office	Cycle Spine Route misses out Main Street where Post Office, pub, hairdressers and garage are. I rely on passing trade. This wouldn't help any of us.	Noted but Main Street will still benefit from passing trade as it does now.	
	31 Ely Cycling Campaign	<p>Ely Cycling Campaign supports the policies for getting around the village and connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes.</p> <p>We support a cycle spine route from Sutton Road to Marroway Lane, Marroway Lane to Common Road, from Common Road to Witchford Village College and from Witchford Village College to Lancaster Way but please read below our comment on access beyond Lancaster Way.</p> <p>A weakness of current infrastructure is that pedestrians, mobility scooter users and cyclists are put together on narrow routes. We</p>	Noted	

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
		recommend that future active travel infrastructure be built to 21st century design standards.		
C1 Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes	31 Ely Cycling Campaign	As pointed out in the policy statements, a safe cycle crossing route across the A10 from Witchford is a priority. In addition, the current cycle crossing of the A142 at the Lancaster Way roundabout needs to be improved.	Noted.	
Conformity with strategic policies of ECDC Local Plan 2015	East Cambridgeshire District Council	<p>Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan. At present strategic policies are set out in the Local Plan 2015, although the plan does not explicitly define which policies are strategic and non-strategic.</p> <p>The amount of housing growth identified by the draft Neighbourhood Plan exceeds the Local Plan 2015, instead responding to the indicative housing requirement set by ECDC. It is accepted practice that Neighbourhood Plans can promote more development than a Local Plan.</p> <p>For other (non-housing) matters, the draft Neighbourhood Plan policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 and national policy.</p> <p>The District Council is therefore satisfied that the draft Neighbourhood Plan does not undermine its strategic policies and is capable of meeting</p>	Noted	

Policy	Ref. No	Comment	Neighbourhood Plan response	NP change?
		the requirement for 'general conformity'.		
General comments	BCN Wildlife Trust	Thank you for consulting the Wildlife Trust on the draft Witchford Neighbourhood Plan. We haven't got any specific detailed comments to make, but we welcome the consideration that has been given to biodiversity and green infrastructure throughout the plan.	Noted	
General comments	Highways England	The plan is a level down from the broader East Cambs local plan as such impacts on the Strategic Road Network should be taken account in their evidence base. It is recognised that the parish is a rural one and therefore to some extent car dependant and that the plan makes some effort to address that. Therefore, we have no comment to make on the plan.	Noted	
General comments	National Grid	No record of electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines within the Neighbourhood Plan area.	Noted	
General comments	Environment Agency	No comments	Noted	
General comments	Historic England	Unable to provide detailed comments at this time.	Noted	

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 18

Regulation 14 Consultation Responses – Landowners/Agents. Last updated 28 August 2019.

Landowner/Agent	Reference
Nicholas and Judith Holdsworth	22 (L/A)
Abbey Properties	24 (L/A)
Deloitte Real Estate prepared on behalf of the Church Commissioners	29 (L/A)
Gladman Developments Ltd	30 (L/A)
Savills on behalf of Manor Oak Homes Ltd	34 (L/A)
Savills on behalf of Bellway Homes Limited (Eastern Counties)	35 (L/A)
Cerda Planning Ltd on behalf of Catesby Strategic Land Ltd	36 (L/A)

Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
Generic - Withdrawn Local Plan	24 (L/A)	<i>Conformity with the strategic policies of the Local Plan 2015</i> Firstly it is not clear within the Draft NP or the Screening Report what the strategic policies are within the East Cambridgeshire Local Plan 2015 which are considered to apply to this Draft NP. Without any reference to these it is not possible to anchor the Draft NP against the strategic policies of the Local Plan 2015. This is a fundamental issue which requires revision, clarification and further consultation. The position is clearly complicated by the withdrawal of the draft Local Plan by the District Council in February 2019 and the fact that the evidence base for that now withdrawn plan appears to have been used extensively in the preparation of the Draft NP.	One of the basic conditions that the plan will be tested against at examination is whether or not the planning policies in the Neighbourhood Plan are in general conformity with the strategic policies of the adopted Local Plan. Compliance with this basic condition is demonstrated in the basic conditions statement which will be submitted alongside the submission Neighbourhood Plan.	No.
Generic - evidence	24 (L/A)	We have concerns that the principal components of the evidence base pre-dates the Local Plan Inspector's conclusions and the subsequent withdrawal of the East Cambridgeshire Local Plan to 2036 and that the evidence relies heavily upon the documents that supported that unsound plan. Such evidence is evidently now dated and, by default (owing the conclusions of the examining Local Plan	The NP group acknowledge that much of the evidence to support the NP was prepared prior to the unexpected and unanticipated withdrawal of the Local Plan in February 2019. This does not equate to saying the NP evidence is no longer relevant or was not relevant to the NP it was prepared to inform.	No.



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		<p>Inspector), not fit for purpose. Such documents include:</p> <p>1) Local Plan context for the Witchford Neighbourhood Plan (November 2017);</p> <p>2) A Demographic & Socio-Economic Review of Witchford (November 2017);</p> <p>3) Landscape Appraisal (December 2018).</p> <p>We therefore have a fundamental concern over the Draft NP given its reliance on the evidence base for the withdrawn Local Plan and the attempt to also somehow claim general conformity with the adopted East Cambridgeshire Local Plan 2015.</p>	<p>1. The Local Plan context for the Witchford Neighbourhood Plan. This was prepared in November 2017 to provide and build an understanding of the existing policy context in which the Neighbourhood Plan was being prepared. The document referred to both the adopted Local Plan planning policy context as well as the then emerging Local Plan context. The document is not intended as an evidence base report underpinning the NP and will not be included as part of the submission documentation.</p> <p>2) Demographic and Socio-Economic Review of the Witchford (November 2017). The demographic and socio-economic data included in this report is relevant regardless of the situation regarding the Local Plan. The NP group therefore reject the assertion that this evidence is not dated and therefore not fit for purpose.</p> <p>3) Landscape Appraisal (December 2018). The purpose of this document (as stated in paragraph 1.2.1 is to 'provide a robust understanding of the character and qualities of the Neighbourhood Plan Area in order to make sound judgements as to the sensitivity and capacity of land surrounding the main settlement to accommodate development and to identify special qualities to be conserved and enhanced'. This understanding is defined irrespective of the Local Plan context at any one time. The NP group therefore reject the assertion that this evidence is now dated and therefore not fit for purpose.</p>	
Generic – housing	24 (L/A)	In any event we also have reservations over the Draft NP given that it is seeking conformity with the 2015 Local Plan for which relevant	A key basic condition that the NP will be tested against at examination is whether or not the NP policies are in	See Change 17.



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
requirement figure		policies were found to be out-of-date shortly after adoption due to its failure to demonstrate a 5-year supply of housing. In our view the Draft NP needs to have regard to this and allocate additional housing well in excess of that planned for currently. Otherwise the Draft NP will by its association with the out-of-date housing policies within the East Cambridgeshire Local Plan 2015 similarly be out-of-date. This situation arose at the Sandbach appeal (APP/R0660/W/15/3129235 – see Appendix Three): paragraph 306 of the Inspector' Report stated:	<p>broad conformity with the adopted Local Plan. In Witchford, this is currently the 2015 Local Plan.</p> <p>The NP takes into account the fact that there is currently no 5-year land supply and that from this perspective the 2015 Local Plan has been found to be out of date. This is the very reason the NP includes the allocations of three sites on edge of settlement boundary and increases the settlement boundary.</p> <p>The Sandbach appeal referred refers to national policy before the adoption of the 2019 NPPF. The 2019 NPPF includes paragraph 14 which affords NPs additional protection where the plan includes policies and allocation which meet its identified housing requirement.</p>	
Generic – Withdrawn Local Plan	24 (L/A)	<i>Main Modifications to the withdrawn Local Plan</i> We would have expected the Draft NP to have full regard to the Main Modifications which were listed by the examining Inspector to the now withdrawn East Cambridgeshire Local Plan to 2036. Those Main Modifications are attached as Appendix Four . The Main Modifications included: a) <i>Amend housing figure to 'minimum of 10,764 new dwellings', alter plan period to 2034 for both housing and employment figures.</i> b) <i>Delete LGS7. Make consequential amendment to Policies Map.</i> LGS7 was a proposed Local Green Space designation of the site (within the now withdrawn Local Plan) referred to as the 'horsefield' in the Draft NP. It is somewhat incredible that this is not even mentioned in the Draft NP.	The Local Plan has been withdrawn by ECDC and has not status. The Main Modifications referred to by the consultee were put forward by the Inspector. They were not consulted on and are now irrelevant as Local Plan has been withdrawn.	
Generic - Evidence	24 (L/A)	<i>Reliance on Landscape Appraisal Report</i> The evidence base which supports the Draft NP includes the Alison Farmer Associates (AFA) Landscape Appraisal from December 2018. That AFA Landscape Appraisal refers specifically to the now withdrawn Local Plan and therefore makes no reference to the 2015 Local Plan against which the Draft NP now seeks to be in conformity with (as the only adopted Local Plan containing strategic policies). In	Not accepted. Section 1.5 of the Landscape Appraisal covers the planning context at the time the report was prepared. It refers to both the 2015 Local Plan and the then emerging Local Plan. This is standard practice for	



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		<p>particular the AFA Landscape Appraisal quotes at paragraphs 1.5.3 the policies of the emerging Local Plan. No reference is made to the strategic policies within the 2015 Local Plan and the AFA Appraisal has not taken account of the 2015 Local Plan's strategic policies which the Draft NP now needs to conform with.</p> <p>Paragraph 4.5.4 of the AFA Landscape Appraisal references the East Cambridgeshire District Council Local Green Spaces Report (November 2017). That Report was produced to support the now withdrawn Local Plan and the Inspector who examined it clearly disagreed with the findings of that report and recommended that the LGS be deleted. We therefore contend that document cannot be given any weight. It is clear from section 4 of the AFA Landscape Appraisal that no additional justification is set out in an attempt to further justify the Local Green Space designations and so by association the AFA Landscape Appraisal must carry no weight in this regard. It appears that the AFA Landscape Appraisal is based on an assumption that the Local Green Space designations would have been found sound by the Inspector examining the now withdrawn Local Plan. The AFA Landscape Appraisal also pre-dates the current version of the NPPF (2019) against which the basic conditions test is to be applied. The weight that can be given to the AFA Landscape Appraisal further diminishes as a result.</p> <p>We also have further concerns about the status of the AFA Landscape Appraisal which we refer to in due course.</p>	<p>professionals.</p> <p>Paragraph 4.5.4 of the Landscape Appraisal does indeed refer to the ECDC Local Green Spaces report November 2017. In fact, it is reviewing the ECDC methodology used in reviewing the proposed Local Green Spaces.</p> <p>Whilst irrelevant here, we do not in fact know whether the ECDC Local Plan Inspector agreed with the findings of the ECDC Local Green Space 2017 report or not. The Inspector did not provide reasons as to recommendation regarding deleting of proposed Local Green Spaces.</p> <p>The proposed Local Green Spaces in the Witchford Neighbourhood Plan is supported by its own Local Green Spaces designation report. This was published in May 2019 and made available for public consultation alongside the draft Neighbourhood Plan. The rationale for each LGS designation is set out in that report.</p>	
Generic - evidence	24 (L/A)	<p><i>Education</i></p> <p>In relation to educational matters paragraph 2.5 of the Draft NP states that there is no pressure on primary school places. Whilst there is no specified reference for that statement in the Draft NP the <i>Cambridgeshire's 0-19 Education Organisation Plan 2018-19</i> states (page 26): <i>The East Cambridgeshire Local Plan adopted in 2015 sets an expectation that 11,500 new homes will need to be built by 2031</i></p>	<p>Paragraph 2.5 in the pre-submission version of the plan was written as such taking into account ECC advice set out in Cambridgeshire's 0-19 Education Organisation Plan 2018 - 2019.</p> <p>Witchford primary school has historically been fully subscribed through taking children living in other</p>	See Change 24



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		<p>... East Cambridgeshire District Council is reviewing its Local Plan in response to changing circumstances. The Plan is expected to be adopted later this year. The outcome of the review is likely to be higher rates of housing growth than were proposed in 2015. There will also be a different distribution or development pattern which will require a re-assessment of where new school places need to be provided. The new Plan is likely to adopt a more distributed approach to development in the District with some significant housing allocations in a number of larger and medium-sized villages ... Clearly the Local Plan review is no longer taking place as the Plan has been withdrawn by the District Council.</p> <p>Page 28 then considers Witchford and states: A development of 200 homes on an exception site within the village will require Rackham Primary School to be expanded to enable it to operate as a 2FE/ 420 place school. The timing will be subject to the build out of the development. In addition, a number of sites are being put forward in Witchford as part of the review of the Local Plan. In response, the Council has established that the further expansion of Rackham primary school to 3FE is not possible on its current site. It will be necessary to secure a site for the development of a second primary school within the village if these major allocations are included.</p>	<p>settlements in particular Ely but the opening of a new primary school in Ely (Isle of Ely YEAR) has resulted in less demand for pupil space from the City of Ely. This, in turn has freed up space for Witchford generated need.</p> <p>Advice has since been sought from ECDC and County to ascertain an up to date position. In August 2018, County Council were not able to seek education contributions from planning application 18/00829/OUM Land at Manor Road Witchford and 18/00778/OUM land north of Marroway Lane on the basis that there was existing capacity pre-school capacity, primary school capacity and secondary school capacity.</p> <p>A more up to date position is provided in County Councils July 2019 response to a planning application for land at 27-39 Sutton Road (19/00966/OUM). This clarifies that there were 246 children aged 4-10 living in the catchment and this total is expected to fall to 180 by 2025/26. County Council anticipate a potential shortfall in primary school places and early years if development is built out on sites put forward (but not planned for as part of the Local Plan and Neighbourhood Plan) through planning applications. Here, they anticipate the development pipeline could increase the primary-aged population by a further 168 pupils (168 plus 180 (as at 2025/26)) takes the overall demand to 348 which exceeds the current capacity of 315 at Rackham primary school). In their calculations, County Council have taken into account development coming forward on permitted sites as well as development on three sites (not anticipated as part of this neighbourhood plan) pending appeal and consent.</p>	



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
Generic - evidence	24 (L/A)	It is clear therefore that once 200 homes are built (over and above the 2015 Local Plan targets) in Witchford then the need to expand the primary school or build a new one is established.	<p>This is not clear. See above for up to date position on this.</p> <p>At an earlier point in the plan development a large strategic site was being proposed on the eastern edge of Witchford for 700 homes. This site did not remain in the examined Local Plan and it our understanding that it was this site that triggered the need for a new primary school in Witchford.</p>	See Change 24
Generic - evidence	24 (L/A)	<p>The County Council has considered the ability to extend the Rackham CoFE Primary School on to our site and their feasibility work is included at Appendix Five. The landowners remain willing to entertain such an extension in the interests of providing a substantial social benefit to the village.</p> <p>The County Council's report reconfirms the overriding need for such a facility. As we understand it the County Council is unable to finance new school developments. The only mechanism of providing new school places is therefore: extending existing facilities or delivering new schools through developer funding (such as the schools being developed in areas of strategic expansion across Cambridgeshire).</p> <p>We also understand that this is already a shortage of pre-school places at the facility which is associated with the school. Pre-schooling is an important consideration given that the Government provides funding for all 3 year olds and some 2 year olds: this is likely to increase the need for additional spaces as the village expands with new family housing already approved. It has been suggested that a new pre-school facility could be provided at the Witchford Village College site (at Manor Road). We do not consider that such an inclusion would be logical owing to: the mixture of pupils that would result (pre-school and secondary); the insecurity of need to move from the College site to the Rackham school when progressing to start primary school; and the need for parents to drop children off at</p>	<p>Noted</p> <p>This is the first time we have seen this Feasibility report. We are seeking clarification from County Council on the status of this work.</p> <p>Advice has since been sought from ECDC and County to ascertain an up to date position. In August 2018, County Council were not able to seek education contributions from planning application 18/00829/OUM Land at Manor Road Witchford and 18/00778/OUM land north of Marroway Lane on the basis that there was existing capacity pre-school capacity, primary school capacity and secondary school capacity.</p> <p>A more up to date position is provided in County Councils July 2019 response to a planning application for land at 27-39 Sutton Road (19/00966/OUM). This clarifies that there were 246 children aged 4-10 living in the catchment and this total is expected to fall to 180 by 2025/26. County Council anticipate a potential shortfall in primary school places and early years if development is built out on sites put forward (but not planned for as part of the Local Plan and Neighbourhood Plan) through planning applications. Here, they anticipate the development pipeline could</p>	



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		two different locations.	increase the primary-aged population by a further 168 pupils (168 plus 180 (as at 2025/26)) takes the overall demand to 348 which exceeds the current capacity of 315 at Rackham primary school). In their calculations, County Council have taken into account development coming forward on permitted sites as well as development on three sites (not anticipated as part of this neighbourhood plan) pending appeal and consent.	
Generic - evidence	24 (L/A)	We further note that the County Council is undertaking works in the vicinity of the school to improve pedestrian access to it. Such works imply to us that the school is a valuable asset which is worth investing further public money into. Those works will inevitably improve the desirability of the school as a facility and make it more popular for parents to send their children to. The ability to maximise the ability of the school to accept new children is therefore re-enforced and the ability to extend it will be required as we have noted above.	<p>The NP group agree, the school is a valuable asset to the community.</p> <p>The works being undertaken across the street is however part of ongoing works of improvement identified by the Parish Council to address ongoing issues with traffic speeds along Main Street. The works result in improved visibility for traffic along the Common Road/Main Street junction.</p> <p>See paragraph 5.8.2 in the Neighbourhood Plan for further information with regards to Parish Council priorities on local transport improvements.</p>	
Generic - evidence	24 (L/A)	<p><i>Other Report and Considerations</i></p> <p>In respect of paragraph 2.7 of the Draft NP reference is made to a report <i>Demographic and Socio-Economic report (2017)</i>. Page 4 of that document confirms that it does not 'capture information about the future population' or indeed the current population. Its relevance is therefore questioned. Page 4 also refers to a housing target of 400 homes for the Draft NP and also references the withdrawal of a 720 home scheme from the emerging Local Plan before it was withdrawn.</p>	<p>This is not considered to be a constructive comment. On page 4, the DSE Review is accurately conveying the available statistics on which the report is based.</p> <p>On page 5, the DSE Review talks about the significant housing growth the plan area is anticipated to experience during the period up to 2036 compared with the past decade. An understanding of what growth could occur (taking into account various aspects of the development pipeline (draft allocations, windfall sites and existing consents) in a plan area provides important context to the neighbourhood plan being progressed at the time of the publication of the</p>	



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Generic – withdrawn Local Plan	30 (L/A)	The Council have been working on a new Local Plan for East Cambridgeshire, which was submitted to the Secretary of State for Examination in Public in February 2018. Following the public hearing sessions, the Inspector concluded that the plan was capable of being found sound, subject to modifications. The Council disagreed with a number of these modifications and as a result withdrew the emerging Local Plan in February 2019. The withdrawn Local Plan had indicated that Witchford is suitably placed to accommodate significant growth and this should be a consideration through the preparation of the WNP.	<p>report.</p> <p>The withdrawn Local Plan has no status.</p> <p>Witchford is a growth village and the NP plans for a 33% increase in dwelling numbers during the period 2018 to 2031.</p> <p>East Cambridgeshire District Council have provided a housing requirement figure of 252 homes where as the NP plans for a 31% increase beyond this of 330 homes.</p>	
Generic Withdrawn Local Plan	29 (L/A)	<p>The Commissioners have extensive land holdings in and around Witchford and in the wider district of East Cambridgeshire.</p> <p>1.6 The Commissioners have been fully engaged in the emerging district Local Plan, which was withdrawn in February 2019 following the Examination hearings. On their behalf Deloitte submitted representations in relation to the Commissioners' land at Witchford, promoting new residential development and objected to a proposed Green Wedge (please see Appendix 1: Hearing Statement).</p> <p>1.7 The Local Plan Inspector identified the Green Wedge proposals as a matter requiring further examination, raising a series of questions at an Examination Hearing Session. On behalf of the Commissioners, we attended and provided evidence at that session. There was not a representative from Witchford Parish Council present.</p> <p>1.8 The key points relating to a proposed Green Wedge at Witchford, which we raised at the Local Plan Examination, remain relevant to the Neighbourhood Plan. In summary these comprised:</p> <p>The proposed Green Wedge designation at Witchford related to the District Council's original intention to allocate land (720 homes) for housing (reference: WFD.M1) on the eastern side of Witchford. The Green Wedge designation was an integral part of this housing</p>	<p>Noted.</p>	See Change 3



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		<p>allocation, which set out a long term approach to the future shape of the settlement. The application of the Green Wedge was not a designation that was intended to be applied without the housing allocation in place.</p> <ul style="list-style-type: none"> The draft housing allocation (WFD.M1) was removed at Full Council (October 2017) following a revised set of recommendations tabled on the night of the Full Council meeting. Unfortunately, given the focus of the meeting was on the draft housing allocation (WFD.M1), the Green Wedge designation was not debated and remained in the Local Plan when it was endorsed at that meeting for Submission to the Secretary of State. Two Green Wedges were proposed in the draft Local Plan at Witchford (no Green Wedges were proposed in any other part of the district). The purpose of the northern Green Wedge was to maintain separation between the existing settlement and the proposed housing allocation (WFD.M1) to the east. The southern Green Wedge was proposed to keep separate Lancaster Way Business Park to the south and the proposed housing allocation (WFD.M1) to the north. The Green Wedge designation was not proposed in preceding drafts of the Local Plan as a standalone designation before the draft housing allocation (WFD.M1) or before the draft employment allocation (ELY.E2a) at Lancaster Way was proposed. The District Council did not therefore consider that the designation was required to maintain separation between Witchford and Ely or between Witchford and the Lancaster Way Business Park. The Green Wedge proposed in the draft Neighbourhood Plan to the south of Main Street covers the same area proposed in the draft Local Plan, save for a Village Hall allocation. However, the Green Wedge proposed to the north covers a much larger area. It includes the Green 		

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		Wedge designation originally proposed in the draft Local Plan, and in addition a much more extensive area of land to the east of Witchford. The land covered by the proposed designation is the same area which was proposed for housing allocation in the draft Submission Local Plan (WFD.M1).		
Generic Withdrawn Local Plan	29 (L/A)	<p>The Neighbourhood Plan process has been subject to some community consultation but to date the Commissioners have not received any invitation to be involved in the preparation of the draft Neighbourhood Plan. This is surprising given the significance of the Commissioners' landholdings in the village and is inconsistent with Government guidance on Neighbourhood Planning (9th May 2019) Paragraph: 048 Reference ID: 41-048-20140306 which advises that:</p> <p>"Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order."</p> <p>1.7 As a key landowner impacted by the Neighbourhood Plan proposals, the Commissioners would have expected to have been invited to be involved with the preparation of the draft Neighbourhood Plan.</p>	The Church Commissioners were specifically invited to comment on the Neighbourhood Plan as part of the Reg. 14 consultation.	
Objectives	34 (L/A)	<p>Broad support is given to be objectives of the draft Neighbourhood Plan in particular:</p> <p>"3. Housing: To maintain a thriving community through the provision of housing to meet the range of needs of current and future residents of Witchford".</p>	Noted	
Objectives	36 (L/A)	<p>Catesby are supportive of the aims and aspirations of the NDP. The draft Witchford Neighbourhood Plan offers a rational vision for the area "to value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs". Catesby Strategy Land Ltd supports the vision of the plan but raises comments to a number of policies within the plan and supporting documents. Such comments are detailed in this document.</p>	Noted.	



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SS1 A Spatial Strategy	24 (L/A)	<p><i>Housing Need</i> The policy only refers to the development which is planned to be delivered under the three allocated sites (approximately 330 dwellings). No allowance is made for additional windfall housing and in any event we would expect the figure to be a minimum one with the policy worded appropriately.</p> <p>The supporting text to the policy refers to the housing requirement for Witchford. The text states that the District Council has provided the parish with a figure of 252 dwellings which is the suggested requirement over the period 2018-2031. This equates to 19.4 new dwellings per annum over the proposed plan period of the Draft NP.</p> <p>No further information has been provided to identify how this figure was calculated by the District Council and so it is extremely unclear how this figure has been arrived at. It is not possible therefore to identify any up-to-date housing need evidence as required by the Planning Practice Guidance¹.</p> <p>We have noted previous Neighbourhood Plan Committee minutes in this regard. The 12th March 2019 minutes suggest that the housing figure was to be a minimum of 334 houses. However the 9th April 2019 minutes then confirm that the position is to reflect sites with Planning Permission only. Assuming a 3 year build out for those sites this means that no further housing will come forward within Witchford in the remainder of the plan period.</p> <p>We do not consider that such an approach satisfies the basic conditions for the reasons set out below:</p> <p>i) at a time where the 'tilted balance' is engaged against the extant development plan due to a shortage of housing supply it would be reasonable and arguably expected to exceed the housing requirement as advocated by the Planning Practice Guidance².</p> <p>Based upon the District Council's current position (see Appendix Six)</p>	<p>This is inaccurate. The policy states the three site allocations will deliver approximately 330 homes. (East Cambridgeshire District Council have provided a housing requirement figure of 252 homes where as the NP plans for 330 homes, representing a 31% increase beyond the 252 requirement).</p> <p>The possibility of other policy-compliant development coming forward within the development envelope is also allowed for in the policy.</p> <p>The possibility of rural exceptions housing is also allowed for.</p> <p>This is explained in paragraph 5.1.2.</p>	



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		<p>it appears clear that they expect the titled balance to remain in place for some time³.</p> <p>ii) the requirement in paragraph 59 of the NPPF to significantly boost the supply of housing.</p> <p>iii) a previous iteration of the draft Local Plan included an allocation for 720 dwellings to the east of the village. This was withdrawn unilaterally by Members before the plan was submitted for examination. This in itself suggests to us that the Council's Planning Policy team considers that Witchford can accommodate significant growth which is also a position which the emerging Local Plan adopted by identifying Witchford as a second tier settlement in the hierarchy for growth.</p> <p>The Draft NP fails to satisfy the basic conditions – such as it does not have regard to Government policy and guidance and does not contribute to sustainable development. We have earlier quoted the Sandbach appeal in this regard.</p>	<p>The housing requirement figure is exceeded through allocations in the Neighbourhood Plan.</p> <p>The current position adopted by ECDC via the 2015 Local Plan is that Witchford should not accommodate this level of growth. An allocation of 720 dwellings in addition to identified number in the draft NP (330), equating to 1,050 homes is clearly disproportionate level of growth for a settlement currently comprising 984 dwellings (960 as at 2011 Census plus 24 net completions 1 April 2011 to 31 March 2018).</p> <p>The proposal for 720 homes as a strategic allocation was rejected by ECDC elected members.</p>	
SS1 A Spatial Strategy	24 (L/A)	<p><i>Housing Supply</i></p> <p>Draft NP policy WNP SS1 also allocates new housing development. We have set out above that there appears to be no evidence to demonstrate the appropriate level of new housing within the village.</p> <p>The allocation of sites WNP H1, WNP H2 and WNP H3 has no technical basis other than that those sites already benefit from Planning Permission. In essence the Draft NP does not in fact allocate any new housing site(s) at all: the planning applications for these sites have already established the principle of development and the policies can do very little in our view to shape the developments any further.</p> <p>The Draft NP does not carry out any appraisal of options or assess individual alternative sites against clearly identified criteria – it therefore fails to adhere to the Planning Practice Guidance. Such an</p>	<p>See paragraph 5.1.2 in the NP.</p> <p>The site allocations are included in the plan to ensure important principles for the development are established and in place should the current planning permissions expire.</p> <p>The Neighbourhood Plan is not in a position to allocate</p>	



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		<p>approach underlines our view that the Draft NP does not in practice allocate housing sites. It is further noted that the draft allocations were all advanced under the 'tilted balance' and such there is no conclusive evidence which demonstrates that the sites are sustainable for the purposes of development plan allocation. Indeed under draft allocation WNP WFDH3 the supporting text acknowledges that the AFA Landscape Appraisal identifies that the site would create adverse impacts and that there is a tension between the AFA Landscape Appraisal and the Draft NP.</p>	<p>alternatives sites in preference to sites where the principle of development has already been established through the consent of planning permission. The usefulness in undertaking an appraisal of options or assessing individual alternative sites was therefore negated.</p>	
SS1 A Spatial Strategy	24 (L/A)	<p><i>Alternative Site</i></p> <p>The land shown at Appendix One and Two is considered to be in a sustainable location close to village services and amenities and furthermore would provide either:</p> <ul style="list-style-type: none"> a) an educational benefit (through the provision of a land gift) together with the delivery of a substantial area of public open space which would deliver a large part of the 'horsefield' into public ownership; or b) the delivery of public open space sufficient to enable the 'horsefield' to be publically owned. <p>Either development would therefore bring with it significant social and environmental benefits which would aid the delivery of aspirations within the Draft NP.</p> <p>Notwithstanding the Local Plan Inspector's conclusion that the 'horsefield' did not satisfy the criteria to be allocated as a Local Green Space (as discussed further below) our proposals (as shown at Appendix One and Two) would deliver significant public open space which would be commensurate with the Parish Council's wishes. The proposed housing allocations therefore do not meet the basic conditions as follows:</p> <ul style="list-style-type: none"> i) the allocations do not satisfy the approach required under Government policy as there has been no attempt to consider the sites against identified criteria; ii) the allocated sites were granted planning permission under an 	<p>This site is not needed to meet the overall housing requirement figure provided to the NP group from ECDC. Furthermore, the development of this site for housing would conflict with</p> <ul style="list-style-type: none"> - community value attached to the Horsefield, the fact the open space qualifies as a Local Green Space (when assessed against paragraph 100 of the NPPF) and its subsequent proposed designation as a Local Green Space - draft Policy WNP LC1 – Landscape and Settlement which identifies this location in Main Street as providing one of four important areas where the landscape extends into the village, helping to secure a strong connection between settlement and countryside <p>Whilst irrelevant since the Inspector's report to a withdrawn Local Plan has no relevance. There is no evidence suggesting the Local Plan Inspector did not find the 'horsefield' as satisfying the criteria for Local Green Space designation. The Local Plan Inspector recommended removal of the policy but we do not know why.</p>	

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		<p>entirely different set of circumstances to that which should be applied when allocating land for development plan purposes. Notwithstanding that the 'tilted balance' is likely to remain in force a proper and evidence based assessment should be undertaken.</p> <p>The Draft NP fails to satisfy the basic conditions – such as it does not have regard to Government policy and guidance and does not contribute to sustainable development.</p>		
SS1 A Spatial Strategy	30 (L/A)	<p>Gladman support the amendments that have been proposed to the development to incorporate sites which now benefit from planning permission since adoption of the Local Plan however we are concerned with the general approach this policy sets out to development proposals.</p> <p>Gladman object to the use of development envelopes in circumstances such as this where they would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of development envelopes to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework.</p> <p>Instead, we suggest that this policy should be worded more flexibly in accordance with Paragraphs 11 and 16(b) of the NPPF (2019) and the requirement for policies to be sufficiently flexible to be able to adapt to rapid change whilst being prepared positively. This is all the more prevalent as at this time the Council is unable to demonstrate a sufficient supply of housing to meet the requirements of the Framework</p>	<p>The proposed Witchford development envelope is consistent with positive approach to growth required by the NPPF.</p>	
SS1 A Spatial Strategy	30 (L/A)	<p>The policy states that the allocated sites will deliver approximately 330 with the supporting text indicating that the Council has provided an updated housing requirement of 252 dwellings in the plan period of 2018 to 2031, in line with Paragraph 66 of the NPPF (2019). However, we have not been able to find an assessment supporting</p>	<p>See paragraph 5.1.2 of the NP.</p>	



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		the plan setting out how this figure has been derived. As this figure has not been set through a strategic policy of an up to date Local Plan this will need to be tested through the neighbourhood plan examination. As such the assumptions that have been to determine this figure should be set out in a report so that interested parties can review this information and make comment where necessary.		
SS1 A Spatial Strategy	34 (L/A)	<p>Housing Need</p> <p>Paragraph 65 of the NPPF notes that strategic policies, contained within up to date Local Plans, should set out a housing requirement figure for designated neighbourhood areas but notes this is not always possible. In such a scenarios paragraph 66 of the NPPF states "...the Local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local authority." (Paragraph: 66)</p> <p>In respect of the draft Witchford Neighbourhood Plan, it is stated at page 23:</p> <p>"To inform the Witchford Neighbourhood Plan, East Cambridgeshire District Council have provided the parish with an updated housing requirement figure to be met during the period 2018 to 2031. This figure is 252 dwellings, or 19.4 dwellings per annum in the period 01 April 2018 to 31 March 2031."</p>	Noted	
SS1 A Spatial Strategy	34 (L/A)	It is noted that the figure of 252 dwellings directly reflects the net commitments for dwellings at sites with planning permission at Witchford at 1st April 2018. It is questioned whether this figure does accurately reflect the needs of Witchford across the suggested plan period 2019 to 2031. There appears to be no formal evidence to demonstrate that the Parish Council nor the District Council has fulfilled the requirements of paragraph 66 of the NPPF particularly in giving due consideration to the latest evidence of housing need and the population of the area in the identification of this suggested housing requirement.	<p>The Parish Council has fulfilled the requirements since it has formally requested a housing figure as per paragraph 66 of the NPPF.</p> <p>See paragraph 5.1.2 to the NP.</p>	



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SS1 A Spatial Strategy	34 (L/A)	<p>Comment is made at paragraph 2.4 of the Draft Neighbourhood Plan to Witchford's population at 2015. It is stated that "Witchford experienced significant growth during the 1990s but has been much more stable recently... and has grown much more slowly since." It is also clearly stated that "The main issues are access to services and housing affordability."</p> <p>It is requested that this suggested housing need figure is reviewed by both the Parish Council and District Council and the up to date evidence is made available for comment at the next stage of neighbourhood plan consultation.</p> <p>Housing Land Supply East Cambridgeshire District Council's Local Plan was adopted in April 2015. The Local Plan seeks to direct development to the market towns of Ely, Soham and Littleport. It is acknowledged that the Local Plan does not identify any land for allocation at Witchford but it is classified as a second tier large village settlement. Notwithstanding this position it is recommended that the emerging Witchford Neighbourhood Plan is positively prepared to seek to secure new sustainable development.</p>	<p>See paragraph 5.1.2 of the NP.</p> <p>Witchford NP is positively prepared. It redefines the settlement boundary and includes site allocations to deliver 330 homes, representing 33% growth during the period 2018 to 2031. A key basic condition to be tested at examination is that the NP is in broad conformity with the strategic policies of the adopted Local Plan. To plan for more growth would raise the question of conformity with the strategic strategy.</p>	
SS1 A Spatial Strategy	34 (L/A)	<p>In the period since the adoption of the Local Plan, the District Council has struggled to maintain a five year housing land supply as required by paragraph 73 of the National Planning Policy Framework. The District Council's latest 'Five Year Land Supply Report' (June 2019) notes that the supply amounts to just 3.70 years. This is relevant to the emerging Neighbourhood Plan as the National Planning Policy Framework (NPPF) advises at paragraph 14 that the critical level of housing land supply for the trigger of the application of the presumption in favour of sustainable development to areas with made Neighbourhood Plans, is less than three years.</p>	Noted.	
SS1 A Spatial Strategy	34 (L/A)	<p>In order to assist the District Council with its housing land supply it is recommended that Witchford Parish Council considers the benefits of allocating additional land for residential development. It is noted that the draft Neighbourhood Plan has identified 3 sites for</p>	Noted	

Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		allocation (Site References: WFD.H1, WFD.H2, and WFD.H3) which have a stated capacity of 330 homes. It is noted that all three of these sites already benefit from planning permission and as such all three sites have been incorporated in East Cambridgeshire District Council's latest Housing Land Supply Report dated June 2019.		
SS1 A Spatial Strategy	34 (L/A)	<p>Witchford is a sustainable settlement which benefits from a range of existing facilities including: Public House, Takeaway, Post Office and general store, Nursery School, Primary School, Secondary School, local employment opportunities and a recreation facilities. It is considered that it could accommodate an additional 70 dwellings at Land south of Sutton Road, Witchford.</p> <p>Land south of Sutton Road, Witchford As you are aware, Manor Oak Homes held a public exhibition on 14th May 2019 to share with the local community initial proposals for residential development at Land south of Sutton Road, Witchford. We have now submitted a planning application seeking outline consent for the construction of up to 70 dwellings, together with associated public open space, landscaping, highways and drainage infrastructure works at the site. The application has been given the reference: 19/00966/OUM and can be viewed on the East Cambridgeshire District Council website.</p> <p>The application is supported by an Illustrative Site Masterplan which demonstrates how residential development at the site can be successfully integrated at the western edge of Witchford, whilst maintaining opportunities for views through the site from the south towards the north. In addition the proposals incorporate appropriate landscaping to enhance the western gateway into the settlement.</p>	<p>The NP housing requirements have already been exceeded through existing NP strategy.</p> <p>This location is outside the proposed development envelope, and is sensitive in landscape terms (see Policy Map 8 of the NP).</p>	
	36 Cerda Planning Ltd on	It is considered that the site at land north of Main Street, Witchford should be included as a site allocation as part of Policy SSP1 (Appendix 1). The present absence of a five-year supply of deliverable housing sites within the district and the recent	Noted. The housing requirement figure for Witchford is exceeded already through NP strategy, policies and allocations. This site is not needed.	



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	behalf of Catesby Strategic Land Ltd	<p>withdrawal of East Cambridgeshire's emerging Local Plan from examination indicate that further sites will be required to be allocated as the housing requirement must be met across the district as a whole. Given that Catesby's site is presently the subject of a live planning application to which there are no technical or policy constraints (given the absence of a five-year supply) it would be an ideal site to be allocated as it is within close proximity of the core of the village and its services and facilities. This is further reinforced due to the site's location immediately adjacent to the settlement boundary and the access point being off the main highway (Main Street) that is the principal thoroughfare through the village.</p> <p>The supporting text to the policy references the following: <i>'Development, including these 5-year land supply sites have resulted in schemes coming forward without due regard to the context, character and sensitivities of Notwithstanding this, it is important that the spatial strategy for the parish is one which takes into account existing commitments (planning permissions) and uses.</i></p> <p>Whilst it is important that the NDP takes into account existing planning permissions, it is also evident that the NDP considers those sites (such as land north of Main Street), in the context of the character and sensitivities of Witchford's setting and wider landscape character. The submitted planning application has set out that the site can be delivered without impact to the character and setting of the village given how well related it is to the existing form and overall pattern of development within the settlement</p>	Also, allocation of this site would undermine the ability of suitable rural exceptions sites to come forward in the plan area.	
LC1 Settlement and Landscape Character	24 (L/A)	<p>We consider that the AFA Landscape Appraisal is being given substantial weight when in fact it is a document which should not be given any. This is partly for the reasons set out above but it is also of concern to us that the document seeks to identify 'Local Character Areas' in order to refine the assessment, It appears to us that this approach has been developed in order to constrain new development within the village and as such it is seeking to influence the location of new development in a manner which is unlawful for</p>	<p>This is a misunderstanding of the purpose of the defining of the Local Character Areas in the Witchford Landscape Appraisal. It has been done as a tool to further understand the character of the landscape.</p> <p>Paragraph 3.5.1 of the Landscape Appraisal describes the purpose of the Local Character Areas as:</p>	See Change 2



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		the reasons set out below.	<p>3.5 Local Character Areas</p> <p><i>3.5.1 To supplement these character areas/types and in order to draw out local variations in character, this assessment has defined a further seven local character areas which are geographically specific and unique and are illustrated on Figure 2. These character areas consider Witchford settlement and its landscape context together articulating how the current built up areas relate to the landscape setting. The character areas help to describe the variety of character found within the Neighbourhood Plan area and local sense of place. A summary description of each character area is provided below. These character areas provide the framework for the detailed analysis and assessment within section 5.0 of this report.</i></p>	
LC1 Settlement and Landscape Character	24 (L/A)	The AFA Landscape Appraisal has not been the subject of any public consultation yet it is seemingly being given weight as if it is a development plan document. We would expect the document to be consulted upon separately as the introduction of Local Character Areas is a strategic planning policy matter which would warrant consideration and public scrutiny. The Draft NP makes no attempt to justify such Local Character Areas and merely restates parts of the Appraisal – Map 7 is a similar copy of the information. To be given weight within a development plan it is reasonable to expect some justification for these Local Character Areas within the Draft NP itself and as part of such as assessment non landscape related planning considerations would require consideration in order to ensure appropriate balance.	<p>The Witchford Landscape Appraisal has been consulted on as part of the pre-submission consultation process. Question 4 of the Comments Form made available as part of the Reg. 14 consultation specifically asks for comments on the Landscape Appraisal.</p> <p>As stated above, the definition of the seven local character areas simply provides a mechanism through which to characterise the landscape. Paragraph 5.2.2. of the Neighbourhood Plan explains this. The purpose of Map 7 in the Neighbourhood Plan is to provide clarity to the reader regarding the boundaries of the different landscape areas in the built-up area of Witchford Village.</p>	
	24 (L/A)	The reference to Map 8 within the Draft NP policy is evidently one which is seeking to restrict development by giving substantial weight to the Local Character Areas in a manner which implies that those areas are enshrined in planning policy. Procedurally we do not	Policy Map 8 defines key views and four areas in the village where landscape extends into the village. These designations have been informed through the Witchford Landscape Appraisal work.	See change 2

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		<p>believe this to be the case. This approach is unjustified and unnecessary.</p> <p>We consider the Map 8 is in any event incorrect for the following reasons:</p> <p>a) the (red) view out to wider landscape which crosses our Appeal Site is incorrectly angled owing to existing buildings and vegetation to the east of the alleged view. Any view is more akin to that designed into the scheme as per Appendix One and Two;</p> <p>b) the (blue) view towards settlement closest to the site is restricted by existing hedges and landscaping;</p> <p>c) the westernmost green arrow appears to extend too far north.</p> <p>Any views are evidently not protected under planning policy and the Draft NP is not seeking to identify the countryside around the village as anything other than countryside.</p> <p>We further contend that the alleged historic interest of the small-scale strip field enclosures are not subject to any designation nor are there identified in any other planning policy document. We do not therefore agree that their retention is necessary or justified</p>	<p>The views have been identified following a review of the Witchford Landscape Appraisal work. Regarding b). Existing hedges and landscaping do form a part of this view but the NP group agree this still comprises an important view into the historic settlement from the public footpaths in the south. The photographs on page 15 of the Landscape Appraisal under sub heading Witchford Historic Core and Strip Pastures are applicable. The photo on the left is taken from the public footpath and illustrates the view indicated on the map.</p> <p>Noted.</p>	
LC1 Settlement and Landscape Character	30 (L/A)	<p>Gladman support the wording of this policy that the identified key views should be respected and not adversely impacted however we are concerned with the evidence that supports the identification of these key views. We note that these views are identified within the Landscape Character Appraisal supporting the WNP however suggest that further detail will be required to ensure that the evidence is sufficiently robust and proportionate for setting out such a policy. We suggest that each identified view should be supported with a description of the physical attributes that take the view 'out of the ordinary' and suitable for identification through this policy.</p>	Noted.	
LC1 Settlement and Landscape	34 (L/A)	<p>Paragraph 170 of the NPPF states that planning policies should contribute to and enhance the natural and local environment through a number of measures including "a) protecting and enhancing valued landscapes... (in a manner commensurate with</p>		

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Character		<p>their statutory status or identified quality within the development plan)". Paragraph 171 of the NPPF states that "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate sites with the least environmental or amenity value where consist with other policies in this Framework."</p> <p>The Draft Neighbourhood Plan is supported by the 'Witchford Landscape Appraisal' (WLA) which is described at page 47 of the Draft Neighbourhood Plan as "...a useful analysis of existing character in both Witchford and across the wider parish." The WLA incorporates a detailed assessment of the peripheral areas of Witchford at section 5. This highlights the key landscape sensitivities, opportunities for development, and guidance for new development for each landscape character area.</p> <p>The suggested wording of Draft Policy WNP LC1 appears to classify all views identified on Map 8 as 'key views' and therefore this implies that all such views have been attributed the same value and therefore protection. In the interest of clarity it is recommended that the Parish Council amends 'Map 8' to clearly identify which views are classified as 'key views' and the value attributed to each identified view as supported by its evidence base.</p>	<p>Draft Policy WNP LC1 does regard all the views on Map 8 to be key. The wording of the policy will be amended to improve clarity.</p>	Change 2
	34 (L/A)	<p>There is a statement at page 22 of the Draft Neighbourhood Plan in about recent development located beyond the Local Plan development envelope, it notes that this development has come forward "...without due regard to the context, character and sensitivities of Witchford's setting and wider landscape character." Objection is raised to this statement as applications are determined in accordance with planning policy unless material considerations indicate otherwise. In respect of these recent permissions the significant need for housing has weighed in favour of the proposals for new housing.</p>	Noted.	
	34 (L/A)	The Draft Neighbourhood Plan states at page 47 a list of changes to	Noted and accepted. Paragraph 5.5.6 to be amended	See change

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		avoid in respect of the design and layout of new residential development. This list includes: "Avoid: ... alterations to the existing settlement gateways even if new development is proposed". However this summary does not accurately reflect the advice contained within the WLA as listed at paragraph 6.2.1 nor does it accurately reflect the specific advice contacted at page 30 of the WLA for the opportunities for development in the Southern Slopes character area which states "...Opportunities exist to strengthen the gateway and approach into the settlement along Sutton Road after the junction with the A142." It is recommended that the Neighbourhood Plan is updated to accurately reflect the supporting evidence base.	to reflect paragraph 6.2.1 of the WLA more accurately.	19
LC1 Settlement and Landscape Character	36 (L/A)	<p>Whilst the aim to retain a distinctive landscape and character of Witchford is to be welcomed, the latter point regarding low-lying land and Witchford being an island settlement effectively imposes a blanket policy to further development in the most sustainable locations on the fringes of the settlement. Such land is most suitable for development, allowing for sustainably located housing that will support the community. If low-lying land cannot be developed, development on higher land will potentially need to be explored which is likely to pose further landscape harm. This will significantly distort the landscape and is discouraged in further elements of the Neighbourhood Plan. The accessibility of development on higher land is significantly reduced, with an additional reliance on a vehicle. Thus, development on higher land is less suitable to support a wide-ranging community, and is less environmentally sustainable, failing to meet Objectives 2,3,4 and 5 of the plan. In conclusion, preventing the development on low-lying land is highly restrictive and prevents Witchford to prosper socially, economically and environmentally.</p> <p>A more positively worded policy, would seek to define character areas and what forms of development may be appropriate in each. The use of Green Wedge for example to the east of the settlement effectively imposes a constraint on development between the eastern edge of the village and Ely. However, in other locations such</p>	The NP strategy and policies allow for the housing requirement for the plan period to be met. The Plan does allow for development to come forward within the development envelope and on edge of settlement locations where they are in sustainable locations and come forward as rural exceptions sites.	

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		as to the west of the settlement, development may well be appropriate in both landscape and settlement character terms, provided it can be demonstrated by applicant's through the planning application process.		
LC2 – Witchford Green Wedge	30 (L/A)	<p>Gladman object to this policy and the principal of the identification of a Green Wedge between Witchford and Lancaster Way Business Park and Ely. We would be opposed to the use of a Green Wedge if this would only serve to act as an arbitrary tool to prevent sustainable development. In this regard we submit that new development is often successfully located in areas between existing settlements without actually leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.</p> <p>As such we suggest that the wording of the policy should be modified. Reference to a 'presumption against' should be removed with the policy reversed with support for development where the bullet points listed apply.</p>	This policy has been amended including a re-designation to "Area of Separation" to reflect the intention underpinning the policy more accurately.	See Change 3
LC2 – Witchford Green Wedge	24 (L/A)	We consider that Map 9 should be referenced rather than Map 8.	Agreed. This will be corrected.	See Change 3
LC2 – Witchford Green Wedge	29 (L/A)	<p>2.2 The Neighbourhood Plan seeks to introduce a new strategic policy, namely a Green Wedge designation (draft Policy WNP LC2 and Policy Map 9). There is no Green Wedge policy in the adopted East Cambs Local Plan. The purpose for the Green Wedge, set out in the Neighbourhood Plan, is not a non-strategic matter associated with responding to site specific matters, but has been designated to perform a much wider, strategic function, one of maintaining separation between Witchford and Ely and Witchford and the Lancaster Way Business Park to the south.</p> <p>2.3 The decision to include a Green Wedge policy is not one that should be taken lightly. Its justification and purpose must be carefully considered. It brings with it a policy constraint which in</p>	This policy has been amended including a re-designation to "Area of Separation" to reflect the intention underpinning the policy more accurately.	See Change 3



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		<p>practical terms is often applied to planning applications in a similar way to Green Belt policy. Given its strategic purpose, its application around or between any one settlement should be considered at a district level, as part of a future Local Plan. It should not be applied in isolation in any one settlement through a Neighbourhood Plan.</p> <p>2.4 Witchford is not an unusual case in terms of its proximity to a larger settlement, there are numerous examples across the district where smaller settlements are in close proximity to larger ones. Around Ely alone this includes the villages of Stuntney, Queen Adelaide and Chettisham. The application of a Green Wedge designation on an ad-hoc, settlement by settlement basis, would have very significant implications for the district's future Local Plan strategy and ability to meet its employment and housing needs. The fact that the Green Wedge in Witchford is proposed on land which up to Submission stage of the new Local Plan was considered a sustainable site for a strategic housing development demonstrates the impact that such an approach could have.</p> <p>In principle, therefore, a Green Wedge policy is a strategic policy for the purposes of the NPPF. It should not be introduced into a Neighbourhood Plan in isolation from a district-wide approach in an adopted Local Plan. The proposal is contrary to Government policy in the NPPF (paragraphs 17 and 18), is not in general conformity with the strategic policies in the adopted Local Plan, and therefore fails the basic conditions test set out in part (a) and (e) of Schedule 4B the Town and Country Planning Act 1990.</p>	<p>Witchford is considered to be different to these other examples since they are significantly much smaller settlements.</p> <p>Furthermore, there is no scope for 'ad hoc' green wedge designations on two of the examples given. The land between Ely and Chettisham as well as Ely and Queen Adelaide (up to Flood Zone extent 3) is already allocated for strategic development in the 2015 Local Plan. The land between Ely and Stuntney all falls within Flood Zone 3.</p> <p>A strategic housing allocation on land currently proposed as an Area of Separation in Witchford NP area would significantly adversely impact existing rural character, landscape setting and sense of place in Witchford.</p>	
LC2 – Witchford Green Wedge	29 (L/A)	<p>The Rationale and Justification for a Green Wedge Policy</p> <p>2.6 To meet the basic conditions tests outlined above, Neighbourhood Plans must have regard to national policy and must contribute to the achievement of sustainable development.</p> <p>2.7 Green Wedge designations are not specifically referenced in Government policy, however, as a concept they have been applied in different parts of the country. Generally, they have been used to meet four functions: i) prevent the merging of settlements, ii)</p>	<p>See change 2.</p> <p>The extent of the Area of Separation is a logical one which extends eastwards to the parish boundary/built development at Lancaster Way Business Park from the eastern village edge.</p>	See Change 2



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		<p>guiding development form, iii) providing a green lung into urban areas, and iv) acting as a recreational resource. These were the same criteria that were applied by East Cambridgeshire District Council when seeking to introduce a Green Wedge policy at Witchford on a much reduced scale in the now abandoned Local Plan.</p> <p>2.8 Reading across the Witchford Neighbourhood Plan the purpose of the proposed Green Wedge designation appears to be to retain a physical separation between Witchford and Ely and between Witchford and Lancaster Way Business Park, in order to retain the identity of the settlement. The justification is focused on preventing development within the designated area but in isolation from any wider development strategy for the village. The commonly used criteria, referred to above, for determining the need for, and location of, Green Wedge designations have not been applied on this occasion.</p> <p>2.9 The single purpose of the Green Wedge in this case, namely one of preventing development, is demonstrated clearly by the justification that has been used through reference to the household survey on page 35. It poses the statement (as opposed to a question): The land between Witchford, the bypass and Lancaster Way business park should remain free from development. There is no explanation as to how this statement has been translated into a robust consideration of whether a Green Wedge designation should be applied in Witchford and any alternatives that were considered.</p>		
LC2 – Witchford Green Wedge	29 (L/A)	<p>2.10 Furthermore, all of the residents quotes referenced in the Neighbourhood Plan to evidence Witchford's residents 'overwhelming support' for retaining a physical separation from Ely (not necessarily the use of a Green Wedge) indicate that they were in response to a specific development proposal. This is not the context within which the Neighbourhood Plan has been prepared. There is no proposal to develop any land east of Witchford. The quotes (page 35) are as follows:</p>	See change 2. The extent of the Area of separation has been informed by findings of the Witchford Landscape Appraisal and site visits, village walks etc.	



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		<p>“Particularly unhappy with proposal to develop between Witchford, the bypass and Lancaster Way”</p> <p>“Witchford is a rural village and residents in the village on the whole want to keep it this way and not an extension of Ely making it built up”</p> <p>“Keep the village as a village and not a suburb of Ely”</p> <p>“Don’t turn it into Ely overspill”</p>		
LC2 – Witchford Green Wedge	29 (L/A)	<p>2.11 We therefore question the validity of the results received in the questionnaire, which have been presented as a key component of the justification for the proposed Green Wedge. The questionnaire results cannot be considered up to date, nor adequate or proportionate, nor focused tightly on supporting and justifying the Green Wedge policy, and are therefore contrary to the NPPF (para 31).</p> <p>2.12 Notwithstanding that the Green Wedge designation has not been considered or applied robustly, we have considered below whether the land designated would meet the commonly applied functions of Green Wedge. Each of the functions has been taken in turn.</p> <p>2.13 It is not clear in the Neighbourhood Plan why the designation of the land is required to prevent the merging of settlements. Ely remains distant to the east of Witchford, on the other side of the A10. The settlements would not merge even if the land was developed. Without the designation, the land would remain outside of the village development envelope, in open countryside, benefiting from the policy protection that national, adopted Local Plan, and draft Neighbourhood Plan (WNP SS1) policy provides.</p>	Development of this land would undermine the rural character of Witchford with a distinctive separate identity to Ely.	



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LC2 – Witchford Green Wedge	29 (L/A)	2.13 It is not clear how the designation guides development form. The purpose set out in the Neighbourhood Plan (Policy WNP LC2) is to prevent, not guide development. The green wedge proposed is distant from any new housing development proposals. The context set out in the section 1 of this statement, demonstrates how the green wedge concept in the now abandoned new Local Plan was introduced alongside a long term development proposal for the village. In contrast, the proposal put forward in the Neighbourhood Plan is to designate a large area of land in order to resist any eastward extension of the village in the future.	The purpose of Policy WNP LC2 is to protect the rural setting to Witchford Village and maintain an open rural landscape between Lancaster way Business Park and Witchford Village and Witchford Village and Ely.	
LC2 – Witchford Green Wedge	29 (L/A)	2.15 The designation does not provide a green lung into the settlement. The land designated to the north of Main Street is private land and contains no right of way. The designation therefore provides no additional community benefit. The right of way to its west which connects the settlement to the A142 to the north, is proposed for designation separately. Undesignated, the land would remain open countryside outside of the settlement boundary. The land proposed as green wedge to the south of Main Street cannot be described as a green lung. It does not penetrate into the settlement or connect the open countryside to the settlement. Instead its agricultural land between the Main Street and Lancaster Way Business Park, with no public access.	<p>See change 2.</p> <p>The WLA identifies that the shallow valley to the north of Main Street but on the southern extent of the Sandpit Drove Valley Local Landscape Area forms a distinctive area of landscape that extends into the village. This is indicated in Figure 3 of the WLA and designated as Landscape extending into the village on Policy Map 8 of the pre-submission NP.</p> <p>The undulating topography in this part of Sandpit Drove Valley Local Landscape Character Areas (LLCA) as well as the visible section of Island of Ely LLCA functions as important rural setting , key to the amenity value of Sandpit Drove Valley (proposed) Local Green Space. Across this landscape it is possible to enjoy views of Ely Cathedral at several points.</p>	

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LC2 – Witchford Green Wedge	29 (L/A)	<p>2.16 The final purpose relates to the provision of a recreational resource. None of the land contains public access, it is land in agricultural use, and therefore does not provide any recreational resource.</p> <p>2.17 The land proposed for Green Wedge designation does not meet any of the commonly used criteria to determine how Green Wedges should be applied. There is therefore no robust planning justification for the proposal, which fails to meet the requirements of the NPPF.</p>	Noted	
GI1 – Public Rights of Way	24 (L/A)	<p>The second paragraph to the policy appears to be unnecessary given the provisions of Section 257 of the Town and Country Planning Act 1990 (as amended). It also again makes reference to Map 8 and is effectively seeking to restrict development within areas that impact upon those views.</p> <p>The policy contains no balancing mechanism to consider other sustainability benefits and is evidently a policy which seeks to restrict new development.</p>	The policy supports development which maintains or enhances the amenity value of a public right of way.	See change 25
GI2 Local Green Space	24 (L/A)	As referenced above we are somewhat bemused by the proposed Local Green Space allocation of the 'horsefield' given that the Local Plan Inspector has very recently advised the District Council to remove this from their now withdrawn Local Plan. There is no reference to such an action within the Draft NP which we find to be unacceptable in itself.	The withdrawn Local Plan has no status and neither do the modifications which were suggested by the Inspector but which were not consulted on or accepted by ECDC.	
GI2 Local Green Space	24 (L/A)	The justification for the Draft NP disregarding the Local Plan Inspector's conclusion can only be found within the <i>Witchford Neighbourhood Plan Local Green Space Designations Report May 2019</i> (the "LGS Designations Report"). The LGS Designations Report similarly does not acknowledge the previous conclusion of the Local Plan examining Inspector.	Noted.	



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GI2 Local Green Space	24 (L/A)	We would note that neither the District nor Parish Council have approached Michael or Peter Seymour in respect of the proposed designation. Such an approach is not consistent with the Planning Practice Guidance ⁵	<p>The landowners of the site have been well aware of the Parish Council's and the NP group's intention to have this site designated as a Local Green Space. This was initially pursued via the Local Plan and now that the Local Plan has been withdrawn it is appropriate that this is done through the Neighbourhood Plan.</p> <p>All residents in the plan area, including the landowners of this site, will have received invitations and publicity via the post providing opportunities to be involved in the plan-making process.</p>	
GI2 Local Green Space	24 (L/A)	<p>The Draft NP and the LGS Designations Report do not refer at all to the Planning Practice Guidance which provides useful information in respect of such matters. In particular the Guidance confirms⁶ that:</p> <p>"there is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation."</p>	None of the proposed LGS are designated simply to protect public rights of way.	
GI2 Local Green Space	24 (L/A)	We also have concerns regarding the extent of the Local Green Space allocation (c. 1.75 hectares) – this is the largest draft allocation of a Local Green Space and its extent does in our view mean that it would be an 'extensive tract of land'. Such a position in itself would mean that the designation is not justified having regard to paragraph 100 of the NPPF. The LGS Designation Report suggests that it is a 'discrete' area of land: the meaning for which is unclear	<p>Planning practice guidance confirms that <i>There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.</i></p> <p>The word discrete is used in the report meaning 'separate and distinct.'</p>	
GI2 Local	24 (L/A)	In relation to the other references within the LGS Designation Report	Noted.	



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Green Space		<p>we agree that the site is within a sustainable location close to the village centre. We do not though see any further evidence to that considered by the Local Plan Inspector to consider that the site is demonstrably special to the local community. One of the main references appears to relate to the footpath network which we have referenced above already. That network would be retained (subject to appropriate diversions as required) within any development on the land. We have been at pains to demonstrate to the Parish Council that the development of this land would enable a large area of this proposed Local Green Space to be delivered. Such a proposition remains within the appeal proposals and would deliver the situation that the Draft NP promotes. The site could therefore be allocated as such with the Draft NP as a housing allocation with public open space. Fundamentally there is no new evidence here that was not before the Local Plan Inspector. The land continues to not fulfil the Local Green Space designation requirements not least due to its scale. There are no demonstrable special features on the land – it is privately owned field with public access via Public Rights of Way.</p>	<p>As documented in the LGS Designation Report, this space is highly valued by the local community <i>“as the last remaining gap in the built up area on the south side of Main Street, providing views to the south over the open fen”</i>.</p> <p>Paragraph 5.2 of the WLA states <i>‘The Horsefield is a meadow which connects the core of the village with the wider landscape and enables countryside to extend into the built up area. It offers an opportunity to view the wider fen landscape from Main Street, as such it reinforces the ‘island’ position of the village surrounded by fen and its rural ‘village’ character’</i>.</p> <p>Conclusions of the ECDC officers reports on the two applications that have been put forward on this site:</p> <p>The officers’ reports for 17/02217/OUM and 18/01336/OUM includes the following reason (for the former it is the second of four reasons for refusal and in the latter it is the first of three reasons for refusal):</p> <p><i>“The application site is located on undeveloped land at the southern edge of the village of Witchford, which currently makes a positive contribution to the setting of the village. Due to the existing landscape features and topography, the site will be clearly visible from a number of receptors. This boundary forms part of a transitional zone between the main built up part of the settlement to the countryside beyond. The proposed development of this land would result in a significant adverse effect on the setting of the village, a Grade II* building and Grade II listed buildings and to the character and appearance of the countryside, contrary to Policy ENV1 of the East Cambridgeshire Local Plan</i></p>	



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			<i>2015. It would also be contrary to Policy LP28 of the Submitted Local Plan 2017 and the guidance contained within paragraphs 14 and 17 of the National Planning Policy Framework which states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes"</i>	
	24 (L/A)	The allocation of the 'horsefield' as a Local Green Space allocation should therefore be removed for the above reasons and not least in order to ensure consistency with the Local Plan Inspector's conclusions. We do find the approach on the Draft NP severely lacking in this regard given the absence of any contact with the landowners and inadequate due to the Local Plan Inspector's conclusions.	As stated already, the reasons for the Local Plans Inspector proposing to remove the LGS designation remain unknown and we can't draw conclusions from this. The withdrawn Local Plan and the Modifications proposed by the Inspector (which were neither accepted or consulted on) have no status.	
GI2 Local Green Space	22 (L/A)	<p>Objection to Witchford Neighbourhood Plan Consultation Draft (July 2019)</p> <p>Please find below our objections to the Witchford Neighbourhood Plan Consultation Draft. Our comments should be read alongside the objections that have also been made by Michael and Peter Seymour and Abbey Properties Cambridgeshire Limited.</p> <p>As you may be aware Judy and I own the land adjacent to The Rackham Church of England Primary School which is both geographically and culturally in the heart of the village. When we were originally approached by a developer in Manchester we were insistent that the needs of the school should be taken into account as part of any development. The location of the land is shown within Appendices One and Two – those sites reflect the two current Planning Appeals as noted in the letter from Abbey Properties Cambridgeshire Limited.</p> <p>Since the original call for sites in 2016 significant additional plots of</p>	<p>It is agreed that Witchford is a growth village and this is reflected in the Neighbourhood Plan which plans for a 33% growth during the period 2018 to 2031.</p> <p>Pre-school capacity and primary school capacity is sufficient to meet this growth. County Council have provided information that demonstrates there is a certain need for increased secondary school capacity and this can be provided on the existing site of Witchford College.</p> <p>County Council have also indicated potential capacity issues with primary and pre-school capacity if other development (not included as part of this plan) included on sites outside the development envelope are granted consent. See County Council response to planning application at land at 27-39 Sutton Road (19/00966/OUM).</p>	



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		<p>land have been given permission over and above those that were brought forward at the time. The housing supply position of the District Council and the need for Witchford to 'do its bit' in approving housing makes it obvious that there will be further significant development in the village.</p> <p>The additional houses both with permission and those in the pipeline will create greater demand for places at the already popular Rackham School. There will be a need to expand it further to maximise its use and retain it as a viable asset for the village, such that it is still able to welcome children from new families into the village who will arrive with the new housing being built. This has already been acknowledged by Cambridgeshire County Council which has proposed a £5 million (see appendix Three below) expansion of the school.</p> <p>The pre-school is also not only physically linked to The Rackham but is part of the 'family' of educational provision for the early years. Children are nurtured in the homely environment of the Pre-School and joining Reception at The Rackham is a relatively un-traumatic step for a child. We believe The County Council's proposal to move the Pre-School to the Village College due to a possible lack of space at The Rackham School would be to the detriment not only of the children, but also make dropping siblings off at different sites difficult and more stressful for parents as well.</p> <p>As the Parish Council was advised in August 2017, it is unlikely that a new primary school would be built near the Village College replacing the Rackham Primary school because the County Council cannot enforce the closure of the Rackham Primary school, because developers would not be willing to fund a new school to meet the existing 300+ primary school places and because any new school would be an academy outside of the County Council's control. £1.7m S106 education contribution from the Field End development also has to be spent at The Rackham and Pre-School.</p>	<p>The NP group also note that the landowner has submitted a second planning application for the same site (reference number 18/01611/OUM) for 33 dwellings which precludes any development that would benefit the school.</p>	



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		<p>Notwithstanding the funding and other issues around building a new school, we believe that the current location of the site at the centre of the village with excellent access to local services and facilities is beneficial to both parents and pupils alike.</p> <p>Indeed the Parish have also acknowledged that the current site of The Rackham is the correct one as they have recently invested in footpath widening and traffic calming measures to aid pedestrian access to the school. We understand that this has been the biggest single highways investment ever undertaken by the Parish Council in Witchford. In the light if this and the factors already outlined, we would argue that expansion on our site is deliverable, sustainable and economically viable giving the school security for a generation.</p> <p>Our original plans were for 57 houses which have been reduced by nearly half to accommodate the Parish's objections and to help mitigate visual impacts and provide social and environmental benefits for the village whilst delivering a sensitive housing development to help sustain growth in the village.</p> <p>The overall package of improvements arising from either of our schemes will give both greater open space for the village as well as improved footpath routes from the Millennium Wood.</p> <p>We believe the choice of expanding The Rackham Church of England Primary School and putting the Pre-school on a sound footing is a price worth paying for some development in the western half of the site. We cannot understand why this is not being put forward as a serious option and believe that the best interests of future generations of parents and children are not being served well by ruling this option out.</p> <p>We therefore consider that the Draft Neighbourhood Plan does not fulfil the basic conditions such that it should be made. We agree with</p>		



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		the reasons set out in the responses which are fully stated in the Abbey Properties Cambridgeshire Limited response (which is also submitted on our behalf).		
GI2 Local Green Space	29 (L/A)	<p>Local Green Space Designation</p> <p>2.24 The Neighbourhood Plan proposes to designate a series of sites as Local Green Space (LGS). Our comments relate to the narrow, linear shaped LGS proposal at Sandpit Drove (Policy WNP GI2).</p> <p>2.25 The NPPF (para 100) sets out the following criteria for determining whether land should be designated as LGS:</p> <ul style="list-style-type: none"> • in reasonably close proximity to the community it serves; • demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • local in character and not an extensive tract of land. <p>2.26 All of the criteria need to be met in order for there to be justification to designate the land. At page 40 of the draft Neighbourhood Plan the LCA has been referenced to justify the designation. In relation to Sandpit Drove, it states that:</p> <p><i>"There is therefore evidence that this area is of value to the local community and meets a number of the criteria for LGS designation."</i></p> <p>2.27 This indicates that some of the criteria have not been met, which raises questions as to whether the LCA can be relied upon to support the designation, if it is unable to conclude that the provisions of the NPPF (para 100) can be met in this case.</p>	All the criteria for Local Green Space designation have been met and this is demonstrated in the Local Green Space Designation Report supporting the NP	
GI2 Local Green Space	29 (L/A)	2.28 The extent of the designation at Sandpit Drove should also be reviewed carefully. It includes primarily a public right of way and associated hedgerows running in a broadly north-south direction. An area that has been identified in the adopted Local Plan as a common land. This is an area valued by the local community and there are displays boards on the southern side of the land explaining the	Noted. The Parish Council are currently taking steps to prevent the use of this part of the site as an informal parking area.	

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		<p>wildlife value of the area.</p> <p>2.28 However, the designation includes an area of land to its south which is a roughly surfaced area used as an informal parking area and as an access to garages on its southern extent. This area of land cannot be considered to meet all of the criteria for an LGS designation. It is clearly not demonstrably special or holds a particular local significance for any of the reasons identified in the NPPF. The designation should therefore be altered to remove this area of land.</p>		
H1 Housing Mix	24 (L/A)	Whilst the basis of this policy appears reasonable we question the requirement for the policy given that the Draft NP's allocations mean that all of the planned development has already been permitted.	Noted	
H1 Housing Mix	24 (L/A)	The supporting text refers to the deliverability of smaller houses including bungalows which the development of the land shown at Appendices One and Two could assist to deliver. Without new housing proposals there may be no way of securing such stock as the three allocated sites already benefit from Planning Permission.	Noted	
H1 Housing Mix	30 (L/A)	Gladman do not consider a neighbourhood plan to be the appropriate mechanism to set requirements for Building Regulations and this should be left to the Local Plan where the requirements can be interrogated robustly at examination in public, supported by the Plan's Viability Assessment, taking in to account other factors that may also affect viability.	Noted.	
H1 Housing Mix	34 (L/A)	The draft wording of this policy states "Homes should be designed to be suitable for independent living and built to be accessible and adaptable dwellings (M4(2) standard)". This implies that all homes will be required to meet this standard however there is no evidence to support the application of this blanket policy requirement. Building Regulation standard M4(2) is optional and therefore is not applied to all homes. It is typical that a proportion of new homes is built to this standard. It suggested that the Parish Council prepares evidence to justify an appropriate percentage of homes within a	Further evidence has been provided to support his part of the policy	

Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		scheme that should be designed to this standard.		
H1 Housing Mix (and E1)	36 (L/A)	<p>We offer no objections to Policy WNP H1 and E1 in principle. However, there could be a degree of conflict with the aims of the policies in recognising that providing home-working facilities may ultimately lead to an increase in the size of properties, in contrast to policy WNP H1, which seeks to encourage a housing mix that is geared towards smaller homes for young people and for older residents.</p> <p>Although smaller homes can meet the needs of younger and older residents, the plan should recognise that smaller homes are often desired by younger people as a first step on the housing ladder. As younger people seek to have families the desire and demand for larger family homes with sufficient bedrooms and living areas for family occupation are required. Therefore, a policy with a broad housing mix should be tailored to ensure that the needs of all those who desire new housing within the village is adopted.</p>	Noted.	
H2 Affordable Housing	34 (L/A)	As set out above concern is raised about the suggested housing need figure of 252 dwellings, this is also relevant to Draft Policy WNP H2 as this draft wording seeks to limit development to "...not exceed the identified local needs". By virtue of the low and unjustified suggested housing need figure, it is considered unlikely that any rural exception sites will be brought forward. The NPPF requires plans to "be positively prepared in a way that is aspirational but deliverable" (para 16) it is questioned how this limitation fulfils this requirement.	This is a policy allowing for rural exceptions sites to come forward on the edge of settlement boundary. Rural exceptions housing are specifically for people with a local connection are provided in perpetuity; they should therefore only come forward if there is a demonstrated local need. Suggest policy wording is amended slightly to reflect this more accurately.	See Change 9
H3 Housing Design	24 (L/A)	<p>This policy also references to the AFA Landscape Appraisal and so our earlier comments as to that document are also relevant.</p> <p>The supporting text indicates that new housing should be avoided on the southern edge of the village. This is clearly not a housing design consideration.</p>	<p>Noted</p> <p>Noted.</p>	
H3 Housing Design	34 (L/A)	The draft wording of this policy states that "Schemes shall complement and enhance local distinctiveness and character by retaining or enhancing the special qualities of Witchford and its setting (as described in the Witchford Landscape Appraisal)." It is	The supporting text highlights the potential for cul de sac developments to undermine nature and layout of development in some parts of the village (for example where linear development is the predominant form).	

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		noted at page 47 of the Neighbourhood Plan that cul-de-sac development should be avoided where it does not reflect the hierarchy of routes. However, in order to achieve the anticipated capacity of the suggested allocation sites it will be necessary for layouts to incorporate loops and in some cases cul-de-sacs. As such it is requested that the Parish Council reviews the implications of this draft policy in so far as it impacts upon the ability to secure efficient use of land available.	This consideration is applicable to the wording of the policy. No change required.	
H1 Housing Mix	35 (L/A)	<p>Whilst the intention is commendable, the actual implications could in fact hinder the delivery of much needed homes at more affordable prices. The principal concerns with the policy requirement are set out below:</p> <p>1. Lack of evidence The optional building regulation M4(2) seeks to achieve homes that are accessible and adaptable. This primarily affects those persons that may have a mobility impairment, whether through age or disability. However, there does not appear to be any evidence published as part of the consultation to indicate the necessary justification for the policy that expects all homes to accord with this optional standard. The very fact that the standard is optional, indicates that it is not deemed a necessary or fundamental requirement for all homes within the UK. It is therefore suggested that further work should be undertaken or published to justify the soundness of this policy. It is anticipated that such evidence collection will indicate a far lesser demand for accessible and adaptable homes and certainly not a need that justifies all homes within Witchford to be designed to this optional standard. In fact evidence may indicate no justified need for this optional standard to apply</p> <p>2. Risks the efficient delivery of homes The requirements of M4(2) specifically require increased circulation space within corridors and all the primary rooms within the house</p>	Further evidence has been provided to support the policy.	



Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		<p>including wash rooms, bedrooms, kitchens and living areas. Such increased requirements result in a greater overall floorspace to each home and subsequently reduced ability to use each housing site as effectively as it would otherwise be possible. This is compounded by external requirements, such as ensuring a car parking space allocated to each property can increase in width to that of a disabled bay. All such criteria mean fewer homes can be accommodated on each site, which ultimately means the same number of homes will need to be delivered on more housing sites.</p> <p>3. Higher purchase prices In light of the M4(2) standard resulting in larger properties, this has a negative impact on the affordability of homes available within the local market area. Property prices are typically led by the sq.ft of a property and as such, increasing the size available to accommodate the M4(2) requirement will inadvertently increase the purchase price of the properties on the market. Given a number of young families or those seeking starter homes will likely prioritize property cost rather than future adaptability, it is not considered such a policy requirement is effectively addressing the needs of all the community. If the Witchford Neighbourhood Plan imposes this policy requirement on all homes within their area, it risks pressuring those that cannot afford the higher cost that results from this optional building regulation from living in the village and instead having to locate to nearby villages where such a requirement is not imposed.</p> <p>On the basis of the above, it is not considered prudent to require all homes to be designed to the M4(2) standard. Such a requirement will result in the less effective use of sites due to the footprints required to meet the M4(2) standard and so resulting in the need for more housing sites, as well as higher resulting purchase prices to reflect the higher floorspace. Given these adverse implications and the fact that evidence does not suggest all homes would need to meet M4(2) standards, it is recommended that the Parish Council undertake additional research. This will help understand whether a</p>		

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		certain proportion of homes within a scheme should be designed to this standard, or whether there is in fact no justification for the requirement.		
IC1 – Witchford Infrastructure and Community Facilities	24 (L/A)	<p>This policy does not appear to have any technical backing and is based upon perceptions. The improvements which are sought are also unlikely to be relevant to proposals given the relative scale of the residential development.</p> <p>Again we note that the proposed housing allocations already benefit from Planning Permission and as such they will have been subject to Section 106 Agreements. This raises questions over the deliverability of this policy.</p> <p>For the reasons that we have set out previously we disagree with the 'NP Update' comments against priority 4 within the table at paragraph 5.7.2 of the Draft NP. There is a need for additional educational facilities and the development of the land shown at Appendices One and Two could help to deliver this.</p>	<p>It is a fact that the principal community priorities expressed through the preparation of the Neighbourhood Plan related to traffic congestion and the poor connectivity (via safe routes for non-motorised vehicles) between Witchford and neighbouring City of Ely.</p> <p>The NP group acknowledge this is an aspirational policy but that doesn't negate its purpose and role in the plan.</p> <p>The text against priority 4 in the table has been updated.</p>	See Change 21
T1 Getting Around the Village	36 (L/A)	This policy is supported, as the importance of improved accessibility and opportunities to utilise non-car methods of transport is a key principle in achieving sustainable communities. Catesby's current planning application at land north of Main Street has been designed to maximise the provision of excellent connectivity links to the village through cycle paths and footpaths that connect in with the existing rights of way.	Noted.	
Witchford Landscape Appraisal 5.2 Analysis Tables: Common Side	36 (L/A)	It is considered that the A142 bypass provides a natural and logical point for extension of development up to from the village. Whilst it is understandable that the NDP may wish to resist development to the northern side of the A142, there are clear opportunities afforded by delivering well planned developments up to it from the south that can provide high quality landscape screening and noise mitigation to the village. Development up to the A142 could therefore be used as an effective solution to strengthening the reinforcing the landscape character and setting of the village and it is suggested that the policy is re-worded to consider this.	Noted.	

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Witchford Landscape Appraisal figure 2 Landscape Character (Appendix 2)	36 (L/A)	We recognise and welcome the importance of a landscape character map to ensure that development is well suited to Witchford. However, the distinction between character areas needs to be considered further. For example, 'Common Side' includes the majority of development in Witchford, whilst also including the A142 and the green fields to the north of the settlement. However, there are clear differences within this character area, particularly around the settlement edge that features predominately more urban influences. Obviously, these aspects drastically differ from one another and we believe should not be classed within the same landscape area. Each character area should be distinct and provide a robust guidance for development. Currently the character areas are too vast and simplified to guide development in a meaningful way.	<p>The Witchford Landscape Appraisal (WLA) helpfully defines seven local landscape character areas to help differentiate differences within the higher level tier of landscape typology provided by The East of England Typology which identifies only two different areas being planned peat fen and lowland village farmland.</p> <p>It is understood that even within the seven character areas there are further differences. These can be understood however on a site by site basis with reference to the WLA.</p>	
Landscape Appraisal	29 (L/A)	<p>2.18 Alongside the questionnaires completed by local residents, a Landscape and Character Assessment (LCA), produced by Alison Farmer Associates, is the other key evidence document that has been used to justify the proposed Green Wedge designation.</p> <p>2.19 It was produced in December 2018, at a time when the emerging Local Plan included a Green Wedge designation in Witchford. However, the LCA does not appear to show any knowledge of why the Green Wedge was proposed in the Local Plan initially i.e. that it was part of a development proposal to expand Witchford to the east. Instead it refers to the area of land between the two Green Wedge proposals, which was proposed for development in the draft Local Plan, as performing a similar function in offering a physical and visual link to the open countryside.</p> <p>2.20 Importantly, its recommendation to expand the Green Wedge is on the basis that the Green Wedge, proposed in the now abandoned Local Plan, will be taken forward. This clearly hasn't happened and given that the Local Plan Examination was ongoing and this was a topic specifically flagged by the Inspector for consideration, it should not have been assumed that the Green Wedge designation would have been retained even had the Local Plan progressed. This is a</p>	<p>Noted and accepted.</p> <p>A more accurate title (Area of Separation) and rationale for this policy designation has now been provided. The designation does not rely on the Witchford Landscape Appraisal.</p>	See Change 3

Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		<p>critical issue as it forms the basis of why the assessment has recommended an expansion of the Green Wedge across a much larger area, and why the Green Wedge has subsequently been reflected in the draft Neighbourhood Plan. At paragraph 4.6.5 of the draft Neighbourhood Plan, it states:</p> <p>“A loss of openness between the two areas of Green Wedge would seriously undermine the ability of these areas to meet their objectives. It is recommended therefore that consideration is given to the extension of the Green Wedge designation across the valley landscape.”</p> <p>2.21 It is not clear therefore whether the same recommendation would have been reached had the assessment not incorrectly assumed that the two Green Wedge proposals were to be retained in the abandoned Local Plan</p>		
Landscape Appraisal	29 (L/A)	<p>Furthermore, LCA is a landscape capacity-led approach, which considers the special qualities of the area and opportunities to enhance and develop these further. It considers the capacity to accommodate development from a landscape/townscape perspective. However, it is not clear in the LCA, or indeed in the Neighbourhood Plan, whether any consideration has been given to the robustness of utilising existing national and Local Plan countryside policies and the need therefore to identify land as Green Wedge. Witchford has a defined village envelope and restrictive countryside protection policies, which entirely covers the land proposed for designation as Green Wedge. We would have anticipated that the effectiveness of these existing policies would have been reviewed first before considering the application of an additional planning tool, in this case, Green Wedge.</p>	Noted.	
Landscape Appraisal	29 (L/A)	<p>2.29 OPEN have been instructed by the Church Commissioners to provide a professional opinion on the Alison Farmer Associates’ landscape appraisal (‘Appraisal’) that was commissioned by the Parish Council to support the preparation of the Neighbourhood Plan. The following text has been prepared by OPEN following a site visit in July 2019.</p>	Noted	



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		<p>2.30 The Appraisal notes that land assessed in terms of sensitivity and capacity is done so from a landscape perspective only and no consideration has been given to matters such as access or land ownership. OPEN understands that the Church Commissioners were not consulted during the Neighbourhood Plan development process, despite having fundamental land ownership interests within and surrounding the village. It is difficult to see how the Appraisal can present a coherent and useful 'vision for the Parish' in the absence of a proper appreciation of the aspirations of key landowners. Without the benefit of key consultation of this type, the vision set out in the Appraisal is undermined</p>		
Landscape Appraisal	29 (L/A)	<p>2.40 On the basis of its fieldwork, OPEN agrees that the "topography and vegetation give rise to intimate and more enclosed character" in the Sandpit Drove Valley local landscape character area (LLCA). This is particularly the case along the southern boundary with Witchford Road, where roadside embankments and mature planting substantially conceal the Sandpit Drove Valley LLCA from views when entering the village. Indeed, it is the case that except for two or three fleeting glimpses, the LLCA is concealed from view from Witchford Road between the A142 roundabout, at the eastern apex of the LLCA, and the allotments next to Broadway, on the edge of the village.</p> <p>2.41 In this sense, the Sandpit Drove Valley LLCA provides a very limited influence on the perception of any gap between the village and the Lancaster Way Business Park, as it cannot be seen from Witchford Road, where any perception of a gap might occur. Accordingly, OPEN does not agree with the identification of the LLCA as performing "an important gap between the Lancaster Way Business Park and Witchford Village". While it may appear to provide a physical break when studied in plan form, this is not how it is appreciated on the ground, in reality, due to the considerable screening along Witchford Road. For this reason land use change would not undermine or alter the existing impression gained along</p>	<p>It is accepted that views are not readily perceived when driving along Main Street/Witchford Road. However, when walking or cycling the views over Sandpit Drove Valley greatly contribute to setting where they occur. Locations include looking north just after the Lancaster Way business park, before and at the gateway to the village, at the bus stop and at the allotment gates.</p> <p>This is not accepted. As noted above, the Sandpit Drove Valley LLCA can be seen from Witchford Road in a number of locations.</p>	

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Landscape Appraisal	29 (L/A)	<p>Witchford Road.</p> <p>2.42 Section 4 of the Appraisal sets out some further analysis of the key considerations that underpin the sense of place and character of the village. Much of this is not disputed by OPEN, however, in the introduction to this section, the Appraisal notes that it “will focus on two areas of open space which have not been identified in the emerging Local Plan as Local Green Space (LGS)”. Green space is discussed further in section 4.5 where the Appraisal notes that the East Cambridgeshire District Council (ECDC) undertook a review of Local Green Space provision in 2017 to determine “if an area warrants designation”. The Appraisal agrees that the criteria applied by the Council reflect those of NPPF with the addition of further criterion and it lists these on pages 21 and 22</p> <p>2.43 Paragraph 4.5.11 confirms that the Parish Council contributed to the Open Space Review undertaken by ECDC, noting that 7 of the 16 sites put forward by the Council were “considered worthy of designation”. OPEN infers from this that the seven sites met the rigorous selection criteria that was applied. The remaining areas did not pass the threshold for selection and this included the Sandpit Drove area to the north east of Witchford Village (as confirmed in paragraph 4.5.12). Notwithstanding this, the Appraisal determined that a further review of two of the excluded sites was justified and goes on to explain why in paragraphs 4.5.17 to 4.5.20</p> <p>2.44 The Appraisal identifies the existence of a PROW through the Sandpit Drove area as the reason why the emerging Local Plan did not identify the area as Local Green Space. This seems too narrow a justification given the range of criteria that were assessed by ECDC in its Review. The Appraisal concludes that the area meets some of the criteria for the LGS designation, including its recreational use and visual amenity. The Appraisal notes that whilst not being identified in the emerging Plan as LGS, it is identified as a Green Wedge, as shown in Figure 1 of the Appraisal.</p>	Noted	

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		<p>2.45 In paragraph 4.6.5, the Appraisal concludes that the area between the two Green Wedges (proposed in the now abandoned Local Plan) shown in Figure 1 should also be identified as a Green Wedge, because it “<i>arguably performs the same function in forming an open physical gap between Witchford and Lancaster Way Business Park and in offering direct and continuous links, both physical and visual, to the open countryside.</i>” No detailed analysis of the relevant criteria for establishing Green Wedges is provided in the Appraisal to support this hypothesis. OPEN does not accept this proposition as it does not consider that the white land between the previously proposed two Green Wedges performs in the way that they are intended to. Adding Green Wedge to the north of Witchford Road would make little or no difference to perception of an open physical gap between Lancaster Way Business Park and the village as it is for the most part not seen.</p> <p>2.46 By infilling the white land between the previously proposed two Green Wedges, the objective of guiding future development of the village would not be fulfilled as residential development is not a development type that is considered compatible within a Green Wedge. Accordingly, OPEN does not agree with the Appraisal’s conclusion that “<i>A loss of openness between the two areas of Green Wedge would seriously undermine the ability of these areas to meet their objectives.</i>”</p>		
Landscape Appraisal	29 (L/A)	2.47 On the basis of OPEN’s fieldwork, the white land between the previously proposed two Green Wedges is particularly well contained; does not contribute to the objectives that were intended within the proposed Green Wedges in the Local Plan (now abandoned) and could accommodate sensitively planned future development without compromising those objectives or harming the setting of the village as appreciated along its main approach. OPEN considers that the basis behind the recommendation in paragraph 4.6.5 of the Appraisal, to conjoin the previously proposed two Green Wedges, is flawed in that sense.		
Landscape	29 (L/A)	2.48 Before going on to consider development capacity in the	Noted. The finger of green connecting back into the	



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Appraisal		Sandpit Drove Valley LLCA, it is also relevant to comment on the analysis undertaken in the Appraisal, as represented in Figure 3. This figure identifies a range of features in and around the village that it considers are important to its character. In relation to an assessment of the eastern part of the village, and specifically the Sandpit Drove Valley LLCA, the plan identifies a finger of green connecting back into the village in the vicinity of the Grunty Fen Drain. This is shown indicatively in Figure 3 and OPEN considers that the important point to note in this regard is the opportunity to preserve views to Ely Cathedral which arise in a north easterly direction when walking along the PRoW. This view is a narrow one and could be framed by sensitively planned development to the east of the Grunty Fen Drain without compromising it.	village in the vicinity of Grunty Fen Drain represents one of four areas where the countryside penetrates into the settlement. Within this open undulating landscape a view of Ely Cathedral is also enjoyed. Whilst the view may be narrow the rural setting to this view contributes greatly to the setting of that view.	
Landscape Appraisal	29 (L/A)	2.49 Figure 3 also identifies a 'View out to Wider Landscape' from a 'Gateway' on the Witchford Road. OPEN does not dispute that there is a view at this location, but it should be noted that it is a fleeting glimpse seen from the road when heading east, through and under vegetation, rather than any notable key or designed view. The Appraisal correctly identifies those key views as arising from <i>"the junction of the A142 and Sutton Road and are towards the rising land and highest point of the island on which Witchford sits (Little Hill). In these views the rising land forms an important landscape backdrop to the village. Further east the views from the A142 are in a northeasterly direction towards Ely Cathedral and the rising slopes of the main Isle of Ely. These views are memorable and noted as quintessential views and approaches to Ely."</i>	The views out to wider landscape may be fleeting if driving. If walking or cycling along the designated footpath or cycle routes, these views are open and readily perceived.	
Landscape Appraisal	29 (L/A)	2.50 The Sandpit Drove Valley LLCA is not located within the line of sight in any of these views, such that it would interrupt 'quintessential' views of Ely Cathedral. Had land to the south of the A142 been at risk of interfering with these key views, it is unlikely that planning permission would have been granted for the development along the northern edge of the village which is under construction at present. The fact is that the views to Ely Cathedral are aligned to the northeast of the A142.	Figure 3 in the Witchford Landscape Appraisal identifies views out to wider landscape at one of the village gateways. From Main Street, it is accepted that views to Ely Cathedral are aligned to the northeast of the A142.	
Landscape	29 (L/A)	2.51 Section 5 of the Appraisal considers the suitability or capacity of	The views from Sandpit Drove Valley LLCA are	



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Appraisal		the areas around Witchford to accommodate development and draws on the assessment carried out earlier within the Appraisal. The Sandpit Drove Valley LLCA is assessed on page 32. It is curious to note that in the table, quintessential views to Ely Cathedral are noted as one of the key landscape sensitivities, yet these views are not identified under the quintessential views identified at paragraph 4.4.4, noted above. While there is an attractive view towards the tower of Ely Cathedral along the PROW when walking north east from the village, it is not one of the quintessential views towards Ely described elsewhere in the study.	indicated on Figure 3 but not described in the brief accompanying description under paragraph 4.4.4. The assessment on page 32 of Sandpit Drove Valley LLCA confirms there are views of Ely Cathedral to the northeast which add orientation and local distinctiveness. Views of Ely Cathedral can be seen across the Sandpit Drove Valley LLCA from Witchford Road at the allotment entrance and along the PROW within the proposed Sandpit Drove Local Green Space.	
Landscape Appraisal	29 (L/A)	2.52 For the reasons set out earlier in this review, OPEN does not accept that the Sandpit Drove Valley LLCA is an “important open rural landscape” which provides “visual and physical separation between Lancaster Way Business Park and Witchford Village”.	This is not accepted and the NP group agree with WLA findings in this regard. Without the open rural landscape here, Witchford Village would be perceived as a continuation of the urbanised feel at Lancaster Way Roundabout.	
Landscape Appraisal	29 (L/A)	2.53 The Appraisal finds no meaningful capacity for further development within the Sandpit Drove Valley LLCA, with the exception of some small areas of land near to Meadow Close. In OPEN’s opinion, this fails to acknowledge the degree to which large parts of the eastern part of the Sandpit Drove Valley LLCA are well contained by mature vegetation and are not conspicuous along the main approach into the village, enhancing their underlying capacity to accommodate further expansion of the village without fundamentally altering its defining character. The Sandpit Drove Valley LLCA has landscape capacity for development, which could be realised though a sensitively planned long term master plan.	This point of disagreement with the WLA is noted.	
Landscape Appraisal	29 (L/A)	2.54 The Appraisal recommends that the Sandpit Drove Valley LLCA is identified in the Neighbourhood Plan for its “open rural character” and that the plan should consider “extension of the Green Wedge designation across the valley to include land between the two currently defined Green Wedge areas.” This finding sits uncomfortably with the Council’s carefully considered response in the emerging Local Plan (based on a detailed evaluation of a range of criteria), cannot be relied upon given the Green Wedge areas are no	This policy WNP – LC2 has been amended including a re-designation to “Area of Separation” to reflect the intention underpinning the policy more accurately.	Change 3

Issue/Pol	Ref. No.	Comment	NP group response	Plan change?
		longer proposed following abandonment of the Local Plan, and OPEN's own evaluation which concludes that the designation does not stand up to robust scrutiny.		
General Comments	36 (L/A)	<p>We are supportive of the draft Neighbourhood Plan but have some concerns as outlined above. The site at Main Street, Witchford could provide the opportunity to deliver high quality housing in a sustainable location and which could provide opportunities to support Witchford's shops, services and facilities.</p> <p>As a final point, we are concerned that the Neighbourhood Plan will require review or alteration soon after being "made" due to the future review of the East Cambridgeshire Local Plan 2015. There remains an outstanding housing need in East Cambs which is recognised in the draft Neighbourhood Plan and in the now revoked Local Plan. Neighbourhood plans present the opportunity for identifying and allocating sites that are suitable for housing, drawing on the knowledge of local communities and being ambitious in creating opportunities for both young people who wish to stay in the area and older people looking to downsize. We would like to support the Neighbourhood Plan in identifying small and medium sized sites which could come forward to help deliver housing for the District, these could be identified as "reserve" sites to accommodate future housing need.</p>	The justification for the spatial strategy is provided in paragraph 5.1.2	

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 19

County Council officer response to draft Witchford Neighbourhood Plan

This response covers comments made by officers as relevant to education provision. They have not been endorsed by Members.

The Vision

The vision for Witchford seeks to ensure that future development meets local needs and therefore local education provision will need to be enhanced in the form of physical expansion of the local primary and secondary schools. Whilst there is an objective to encourage and protect infrastructure in the Plan, it should be strengthened to specifically reference educational need and remove any barriers to, and facilitate expansion of, the schools, especially Rackham Primary School.

NP group comment: The NP group and PC supports the expansion of the primary school where this need is triggered through development proposed in the plan. The NP group acknowledge the up to date position provided by County Council on 12 August 2019. This demonstrates a very likely need for increased secondary school capacity during the plan period which can be accommodated for on the existing site. With regard to primary school capacity, the situation is less certain. The figures provided by County Council demonstrate that there is sufficient capacity to meet the needs generated by the development proposed as part of the Neighbourhood Plan. Additional capacity will be triggered if non plan-compliant development comes forward.

Policy Comments

Policy WNP SS1 – Spatial Strategy for Witchford

This policy would not support expansion of Rackham Primary School since land required to do so would fall outside the village development envelope and the more restrictive presumptions. Education uses should be included in the list of acceptable development.

NP group comment: Accepted. See change 29.

Policy WNP – GI2 Local Green Space

It should be clarified as to whether school playing fields would be acceptable uses in LGS, since this could help facilitate expansion of the primary school.

NP group comment. This is not considered necessary.

Policy WNP IC1 – Infrastructure and Community Facilities

This policy lists transport issues as priorities for the plan, however, a further priority should also be education, and specifically expansion of the primary school to facilitate growth.

NP group comment. See change 22.

Witchford Neighbourhood Plan Consultation Statement

APPENDIX 20 Single set of approved amendments to Consultation Draft Neighbourhood Plan text following Regulation 14 consultation

No.	Item	Change
1	Map 5 Inset Map	Amend map to show allocations and LGS/Green Wedge with hatching.
2	LC1 Landscape and Settlement	<p>Wording of supporting text to be reviewed.</p> <p>“All development proposals shall be sensitive to the distinctive landscape and settlement character, as described in the Witchford Landscape Appraisal.”</p> <p>Specifically:</p> <ul style="list-style-type: none"> i. locations defined on Map 8 where the landscape extends into the village shall be protected from development where this would result in undermining a strong connection between settlement and countryside; ii. development proposals shall respect and not adversely impact upon the key views from the edge of Witchford village out into the countryside and the views from the countryside into the Witchford village –as identified on Map 8; iii. Witchford’s historic core and its valued setting shall be conserved and where possible enhanced; and iv. Witchford shall remain an island settlement; the northern slopes and the low-lying landscapes which surround Witchford shall remain open; and v. Sense of arrival and distinctiveness at existing settlement gateways to remain intact or be strengthened. <p>Where potential impacts on Witchford’s distinctive landscape and settlement character are identified, applicants will be expected to demonstrate accordance with these principles through provision of an assessment of landscape and visual impacts (proportionate to the scheme proposed) and drawing, in this process, on guidance and recommendations in the Witchford Landscape Appraisal.</p>
3	LC2 Witchford Green Wedge	<p>Policy to be reviewed following Regulation 14 consultation responses.</p> <ul style="list-style-type: none"> 1. Rename policy to Area of Separation 2. Change Map reference to read Map 9. Amend map title. 3. Provide more supporting evidence and more supporting text. This is provided separately.

No.	Item	Change
		<p>4. Amend Policy as follows:</p> <p>WNP LC 2 –Witchford Area of Separation</p> <p>Development will be directed in a way that respects and retains the open and undeveloped nature of the distinctive valley topography that separates Witchford village from Lancaster Way Business Park and separates Witchford village from Ely.</p> <p>Development proposals may only be supported in the Witchford Area of Separation (as shown on Map 8) unless where it can be demonstrated that proposals:</p> <ul style="list-style-type: none"> • Would not reduce the physical and / or visual separation between Witchford village and Lancaster Way Business Park; • Would not reduce the physical and / or visual separation between Witchford village and Ely; and • Would maintain or enhance the enjoyment of the Public Rights of Way network and links to the countryside. <p>To demonstrate the visual impact of a proposal applicants will be required to provide a landscape and visual impact appraisal.</p> <p>5. Amend supporting text in line with separate paper called 110919 Proposed Supporting Text to Policy WNP – LC2 Area of Separation</p> <p>6. Provide additional evidence paper for defined Area of Separation (with photos) in line with separate paper called Supporting Evidence Paper for Policy WNP LC2 - Witchford Area of Separation.</p>
4	GI1 Public Rights of Way	At 5.4.2 include definitions of the different categories of public rights of way, for public information.
5	GI2 Local Green Space Report	<p>Reference 3.3 (page 7) Add to ‘Old Scenes Drove’ ‘aka Holts End’.</p> <p>Reference 3.10 Manor Road Allotments (page 14) Include that the initial 20# 5-pole plots were increased to 30 due to demand.</p> <p>Reference 3.12 Field End and Wheats Close Open Space</p> <p>Orton Drive & Wheats Close’ more appropriate as the Green is part of the Reason Homes development not the Wilcon</p>

No.	Item	Change
		development.
6	GI2 Local Green Space	<p>The wording of paragraph 5.4.4 to be revised as follows:</p> <p>5.4.4 Context and reasoned justification The criteria for Local Green Space designation are set out in paragraph 100 of the NPPF. This states the green space should be:</p> <ul style="list-style-type: none"> • in reasonably close proximity to the community it serves; • demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • local in character and not an extensive tract of land. <p>This policy is underpinned by the documentary evidence included in Appendix 1 and in particular the Witchford Local Green Spaces Report (May 2019).</p> <p>The Witchford Local Green Spaces Report (May 2019) contains a detailed assessment of the proposed Local Green Spaces against the NPPF criteria and a full justification for their designation.</p>
7	GI3 Development and Biodiversity	<p>Amend reference to Sustainable Drainage Systems (SuDS)).’</p> <p>Amend text to read ‘The Wildlife Trusts’.</p> <p>Add document to Appendix 1.</p>
8	GI3 Development and Biodiversity	<p>Amend wording of policy as per below (need to compare this with pre submission version to identify changes):</p> <p>Development should avoid adverse impacts on biodiversity and provide net gains in biodiversity by creating, restoring and enhancing habitats for the benefit of species. In doing so, applicants must seek to retain and where possible enhance the network of species and habitats currently present in the parish.</p> <p>Development proposals are supported where they enhance biodiversity in the parish through designing in green infrastructure measures as part of the design and layout of a scheme. Such measures include:</p> <ul style="list-style-type: none"> • Trees, hedgerows, water and other habitats integrated into the development; • Wildflower verges along roads and formal open spaces;

No.	Item	Change
		<ul style="list-style-type: none"> • Lighting designed to avoid disturbing wildlife; • Bat roosts and bird boxes; • Features and corridors to help invertebrates, reptiles, hedgehogs and other mammals. <p>Development proposals should also include measures to decrease flood risk that are in accordance with Sustainable Drainage Systems (SuDS) principles and which will enhance biodiversity. Such measures include:</p> <ul style="list-style-type: none"> • Wildlife-friendly green roofs and walls; • Permeable driveways; • Swales and rain gardens enhancing landscape, connectivity and biodiversity; and • Attenuation ponds suitable for wetland wildlife.
9	H2 Affordable Housing	<p>The wording of this policy amended as follows:</p> <p>Add “for affordable housing” to the end of the first bullet point.</p> <p>Also rename the policy title as follows: Policy WNP H2 Affordable Housing on Rural Exceptions Sites</p>
10	H3 Housing Design and GI3 Development and Biodiversity	<p>Add sentence to 5.5.5. Intent ‘This policy is intended to complement policy GI3 Development and Biodiversity’.</p> <p>Add sentence to 5.4.5 Intent “This policy is intended to complement policy H3 Housing Design.</p>
11	IC2 -Witchford Village Hall and Recreation Ground	Add additional bullet point to policy IC2:’ it must be demonstrated how additional demand for car parking will be accommodated within the allocated land’ or similar wording
12	IC4 Flooding	Add reference to ECDC Local Plan Policy ENV8 Flood Risk to paragraph 5.7.7 Intent for Policy IC4 Flooding
13	IC4 Flooding	<p>Amend policy as follows:</p> <p>Policy-WNP IC4 Flooding</p> <p>All development proposals involving new build and situated within those areas in the parish at risk from surface water flooding (as documented in the most up to date Strategic Flood Risk Assessment and Surface Water Management Plan) shall be accompanied by a site-specific flood risk assessment.</p> <p>Such development proposals shall:</p> <ul style="list-style-type: none"> • be accompanied by a Surface Water Drainage Strategy; • ensure all surface water is appropriately managed through the use of sustainable drainage systems and include detailed proposals for future maintenance of these; and

No.	Item	Change
		<ul style="list-style-type: none"> • be designed and constructed to reduce the overall level of surface flood risk to the use of the site and elsewhere when compared to the current use. <p>For all locations, Sustainable Drainage Systems are the preferred method of surface water disposal and should be incorporated unless demonstrably unfeasible to do so; systems that benefit Witchford's biodiversity and wildlife will be preferred over systems that do not.</p>
14	C1 Connecting Witchford and Ely through sustainable and safe cycle and pedestrian routes	Amend map to remove error at eastern end indicating an area (in error) where there is no segregated route.
15	Other projects	Add 'Improvements to public rights of way crossings over A142' to list of 'Other schemes not deliverable by Witchford Parish Council but which the Parish Council will support or lobby for' at paragraph 6.4. Small scale works such as bollards and signing could be met through CIL contributions – add to 'CIL Funded Project List' at paragraph 6.3.
16	Other projects	Bring to Witchford Parish Council for consideration as to whether to add to CIL123 List
17	Supporting text to Spatial Strategy 5.1.2	Amend last paragraph as follows: The Neighbourhood Plan assumes that from 2018 through to 2031 there will be a delivery of a minimum of 330 homes in Witchford Village. In 2011, Witchford had 960 homes (Census 2011). Since then there have been 24 net dwelling completions. Growth of 330 homes therefore represents a 33% increase during the period 2018 to 2031. These will be delivered in line with the site allocations in this plan. In addition, the Neighbourhood Plan allows for further dwellings to be delivered via appropriate policy compliant infill within the Witchford development envelope.
18	Policy Map 8, page 29	Is resolution good enough. Refine it?
19	Policy WNP – H3 Housing Design	<p>Amend 5th bullet point under the sub heading "Avoid": under paragraph 5.5.6. to</p> <p>"alterations to existing settlement gateways which weaken sense of arrival and distinctiveness"</p> <p>Delete the third bullet point under sub heading "Avoid" (cul-de-sac development which) because it is a duplication if new paragraph inserted as per below.</p> <p>Insert a new paragraph into NP under 5.5.6 which reads:</p>

No.	Item	Change
		<p>The WLA also includes the following development guidelines (on page 37) which are applicable when new development is being considered:</p> <ul style="list-style-type: none"> - Avoid cul-de-sac developments which do not reflect lane hierarchy and form of the settlement; - Seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement; - Avoid extending gateways into the wider landscape where new development is proposed - avoid the development of roundabouts at the junction of the settlement with major roads which are uncharacteristic and undermine the rural 'village' character of the settlement; - Avoid cumulative effects of small housing schemes which collectively, over time, extend the urban edge and relate poorly to one another – seek wider masterplans and visions for broader areas linking in aspirations for open space, reinforcement of rural landscape setting, views and vistas, public rights of way/circular countryside walks and recreation; - Avoid infill development which undermines the rural character of the village or connectivity to the wider landscape setting and which affects key sequential views along Main Street and lanes.
20	Policy WNP – GI2 – Local Green Spaces	Review LGS report and include fuller descriptions and include close up of each plot which shows the PROW network. We can do this after 28 August.
21	<p>IC1 – Witchford Infrastructure and Community Facilities</p> <p>Paragraph 5.7.2</p>	<p>Revise item 4. in the table as follows:</p> <p>The provision of education facilities is considered a priority when there is a need. As at spring 2019, there are no known capacity issues at either Rackham Primary School or Witchford college (secondary school). It is also recognised that previous capacity issues (created by out of catchment children coming into Witchford) were alleviated once additional primary schools had been opened in Ely and Littleport (i.e. the Isle of Ely primary school and Littleport and East Cambs Academy).</p> <p>Insert additional paragraph under the table to state the following:</p> <p>Future primary and secondary school expansion</p> <p>5.7.3 It is acknowledged that the County Council anticipates a future shortfall in secondary school places due to an expected increase in secondary school-aged pupils in the catchment area during the plan period, together with an increase triggered by planned development. There is capacity on the existing Witchford Village College site for any</p>



No.	Item	Change
		<p>required expansion to take place.</p> <p>It is also acknowledged that County Council have identified a potential shortfall in primary school and early years places if additional development (not included in the Neighbourhood Plan) comes forward on sites outside the development envelope and as departures from the Neighbourhood Plan/Local Plan. However, primary school-aged pupils in the catchment area are expected to decline from 246 down to 180 by 2025/26. This means that a future deficit will depend on the extent to which planning applications on sites which conflict with the Local Plan and Neighbourhood Pan are approved.</p> <p>The County Council has indicated that there is little or no capacity for Rackham Primary School to expand on the existing site. When there is more certainty with regard to actual demand for future primary and early years places (e.g. once the outcomes of existing planning applications are determined), it will be appropriate for the position regarding capacity to be reviewed. If, at this point, there is an evidenced need for additional primary school space to be provided, then the question of where and how this comes forward can be the addressed as part of a review of the Neighbourhood Plan, in consultation with resident and stakeholder involvement. At this point in time, there are two broad areas which the NP group consider could be appropriate locations for future primary and secondary school capacity, subject to evidence of need being in place and subject to further consultation on this with the community and key stakeholder. These areas of search are shown on map [map number to be confirmed] The Parish Council will continue to liaise with the County Council, the community and other stakeholders with regard to primary and secondary school provision as the situation evolves (see Chapter 6. Community Projects).</p>
22	Site allocation WNP WFDH1 Supporting text: 5.6.1	<p>Update the first paragraph to reflect that development is under construction.</p> <p>Intent</p> <p>There are two planning consents applicable to this site. Development is consented for up to 128 new homes in the eastern part of the site. The western part of the site has outline planning consent for the development of 40 new homes. As at July 2019, the site in the eastern part of the site is under construction.</p> <p>This site allocation is included in the plan to ensure important principles for the development are established and in place ready for the detailed consent application and, in the event of the current permissions expiring, in place ready for future applications. In this particular case, where the eastern part of the site is now under construction, it is important to</p>

No.	Item	Change
		ensure the delivery of the western part of the site is designed as an integral and logical part of the new neighbourhood.
23	Site allocation WNP WFDH2 Policy and Supporting text: 5.6.3	<p>Amend policy as follows:</p> <p>Site Allocation WNP WFDH2</p> <p>Land is allocated at Common Road for the development of up to 120 homes. The following site-specific considerations and requirements apply to this site:</p> <ul style="list-style-type: none"> • The retention of a landscape buffer between the village edge and the A142 as a way of maintaining separation. • Low lying land to the north of the site including the ditches to be used for land drainage and maximise potential of landscape value through sensitively designed land drainage scheme. • Setting aside land for a west east pedestrian and cycle spine route from Common Road through to Witchford Village College. • Incorporation of a surface water drainage scheme for the site based on sustainable drainage principles and which delivers biodiversity benefits. • Delivery of this section of the west east pedestrian and cycle spine route from Common Road through to Witchford Village College. <p>5.6.3 Intent</p> <p>This site is subject to an application for outline planning consent. This site allocation is included in the plan to ensure important principles for the development are established and in place ready for detailed consent application and, in the event of the current permission expiring, in place ready for future decision making.</p>
24	Paragraph 2.5 Employment and Services (third paragraph)	<p>Witchford benefits from pre-school, primary school and secondary school facilities. The Rackham CofE Primary School 2018-19 PAN (Published Admission Number) is 315, Witchford Village College's 2018-19 PAN is 900 (but pupils on roll in January 2019 is 800) and there is current capacity for early years provision (provided by Witchford Rackham Pre-School and Lancaster Lodge Childcare) for 98 places.</p> <p>As at July 2019, there are no capacity issues for early years provision, primary school provision and secondary school provision. With regards to primary-aged children there were 246 children aged 4-10 living in the catchment and this total is expected to fall to 180 by 2025/26. With regard to secondary school-aged children in January 2018, there were 875 children aged 11 – 15 living in the catchment area and this is anticipated to increase to 979 by 2022/23.</p>

No.	Item	Change
		<p>However, the County Council has articulated as part of responses to planning applications that increases in the catchment population, together with increases triggered by approved development, means that there is a certain need to increase secondary school places at Witchford Village College at some point during the plan period and the County Council has costed a project for this to take place.</p> <p>The County Council also anticipates a potential shortfall in primary school places and early years <i>if</i> development is built out on sites put forward (but not included in the Local Plan and Neighbourhood Plan) through planning applications. This can be seen for example from viewing the County Council response to a planning application for land at 27-39 Sutton Road (19/00966/OUM) prepared in July 2019. Here, they anticipate the development pipeline <i>could</i> increase the primary-aged population by a further 168 pupils (168 plus 180 (as at 2025/26) takes the overall demand to 348 which exceeds the current capacity of 315 at Rackham primary school). In their calculations, County Council have taken into account development coming forward on permitted sites as well as development on three sites (not anticipated as part of this neighbourhood plan) pending appeal and consent.</p> <p>The County Council's position in July 2019 can be established by reviewing their response to a recent planning application for land at 27-39 Sutton Road (19/00966/OUM). This can be found at www.eastcambs.gov.uk and is also provided in the evidence base supporting this plan.</p>
25	Policy WNP GI1 – Public Rights of Way	<p>Development proposals that will enhance or extend an existing public right of way or that will deliver a new public right of way in a suitable location will be viewed favourably.</p> <p>Development proposals shall maintain or enhance the amenity value of a public right of way.</p>
26	<p>Policy WNP SS1 – A Spatial Strategy for Witchford</p> <p>Policy Intent</p>	<p>Provide an additional sentence in the supporting text under paragraph 5.1.1.</p> <p>5.1.1 Intent To provide a strategic overview and clarity of the future direction of development in the plan area.</p> <p>For avoidance of doubt, the development envelope shown on Policy Map 6 supersedes the development envelope provided in the 2015 Local Plan.</p>
27	Policy IC3 Protection of Witchford's Community	Amend policy as follows:

No.	Item	Change
	Facilities.	Development proposals should not prejudice the retention of the village pub and post office/shop; rather they should help them prosper, for example through safeguarding associated parking, village centre street scene improvements, or through development of complementary uses that will generate additional footfall.
28	Policy WNP SS1 A Spatial Strategy for Witchford	<p>Amend policy as follows:</p> <p>Policy WNP SS1 A spatial strategy for Witchford</p> <p>Development proposals which accord with the site allocations WNP H1, WNP H2 and WNP H3 shown on Map 5 will be supported. In addition, other proposals within Witchford's development envelope, which is defined on Policy Map 6 will be supported provided they accord with other provisions in the Development Plan.</p> <p>Outside the development envelope, development will be restricted to:</p> <ul style="list-style-type: none"> • rural exception housing on the edge of the village where such schemes accord with Policy WNP H2 of this plan; • appropriate employment development at the Sedgeway Business Park where such schemes accord with Policy WNP – E2 of this plan; and • development for agriculture, horticulture, outdoor recreation, essential educational infrastructure and other uses that need to be located in the countryside. <p>The allocated sites will deliver approximately 330 homes during the plan period 2019 to 2031</p>
29	Chapter 6	<p>Insert a new paragraph 6.5.</p> <p>6.5 The Parish Council will liaise with the County Council, the primary school, stakeholders, landowners and the wider community with regard to future primary and secondary school provision in the plan area. Once it becomes apparent that additional land for new facilities will be required the Parish Council will look to safeguard sites (as part of a revised Neighbourhood Plan) for future provision. Possible sites for future safeguarding include those shown on the Broad Areas of Search Map for possible future Education infrastructure, a map submitted alongside this Neighbourhood Plan. Education provision will be considered at the first review of the Neighbourhood Plan.</p>
30	Paragraph 5.7.8	Add a sentence at paragraph 5.7.8 of the draft Neighbourhood Plan explicitly referring to the SUDS paper in the document list at Appendix 1
31	Paragraph 5.5.6	Add paragraph 5.5.6 of the draft Neighbourhood Plan adding a sentence referring to the 'A New Way to Build' approach

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