



This matter is being dealt with by Rachel Hogger, Strategic Planning and Development Management

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My reference Witcham NP/Reg16
Your reference
Date 02 September 2025

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ContactUs@eastcambs.gov.uk.

RE: Witcham Neighbourhood Plan Regulation 16 consultation

This letter sets out East Cambridgeshire District Council's (ECDC) response to the submitted plan, which is being consulted upon until 2 September 2025.

East Cambridgeshire District Council welcomes Witcham Parish Council bringing forward this Plan, and the Plan is considered to be well presented, with clear identification of what are policies and what is wider supporting text. There is a helpful use of maps and diagrams throughout.

The district council has no fundamental concerns with the content of the Plan and its policies.

Requested changes

In addition to a handful of drafting errors identified in Appendix 1 to this letter, there are a small number of areas where the district council is seeking amendments to the Plan as set out below.

Images

Clarity in the plan would be increased if the images were labelled. As an example, it is not clear whether the image on page 30 is depicting information that is relevant to Policy WHM 12 under which it sits.

Paragraph 3.4

So as not to lead to misunderstanding, it is important this paragraph is clear that the adopted Local Plan was last amended in 2023. The first sentence should therefore be amended to "At a more local level, the relevant Local Plan is the East Cambridgeshire Local Plan 2015 (as amended 2023)".

Paragraph 6.6

To avoid confusion in the future it would be clearer if this sentence were amended to "Other housing policies contained in the East Cambridgeshire Local Plan 2015 (as amended 2023) and of relevance to Witcham are: ..."

Paragraphs 7.1 and 7.2

Paragraphs 7.1 and 7.2 describe the importance of the Ouse Washes as a natural habitat and its status as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), a Ramsar site and a Special Area of Conservation (SAC). This is helpful.

The council requests the important and relevant information set out below is then also provided. This will improve clarity, especially in light of the Goose and Swan IRZ being referred to later in the plan, but just once and only with respect to Policy WHM 10 'Renewable Energy'.

- the entirety of the neighbourhood area/parish (where it is not within the SSSI itself) falls within the Impact Risk Zone for the Ouse Washes SSSI, which means Natural England should be consulted for proposals that meet certain criteria
- the parish/neighbourhood area is on the periphery of the Goose and Swan Functional Land Impact Risk Zone (IRZ), which is an area identified as providing important functional habitat for qualifying bird species. The IRZ covers a large area of land in the northern part of East Cambridgeshire District including the very northern part of Witcham parish.

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It is noted the 'Proposed Character' for the 'Countryside' character area is a repeat of the 'Proposed Character' for the 'Silver Street' character area. This is assumed to be a drafting error and if this is the case, it is very important the former is corrected so that it reflects the advice set out on page 83 of 'Witcham's Design Guidance and Codes'.

Maps 8 and 9

As the flood risk maps are subject to change and updates, it is suggested the labels for these two maps reflect the date of map extraction. It is also recommended that a sentence is added clarifying that up-to-date flood risk mapping data can be accessed online at

<https://www.gov.uk/check-long-term-flood-risk>

Policy WHM 9 'Sustainable Building Practices'

Given the fact that entire eastern England region is classified as seriously water stressed <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification> the council agrees that water efficiency standards in new residential development should be appropriately set and supports the requirement that standards should not exceed 110 litres per person per day. The council also agrees that water efficiency standards in new homes should exceed this level.

However, it would be helpful if the supporting text to Policy WHM 9 'Sustainable Building Practices' provided an explanation with respect to the 100 litres per person per day standard that is referred to at the end of the policy. The reason for this request is that other guidance refers to different targets. The shared standards recently published (June 2025) by the Environment Agency and Natural England, together with the water companies covering the Water Resources East area <https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf> sets out a need for new homes to achieve a design standard of up to 85 litres/person/day (l/p/d) with less stringent levels (90 or 95 litres/person/day) where viability or environmental risks poses a barrier to achieving 85 l/p/d. The context to the shared standards is classification of the entire eastern England region being classified as seriously water stressed (<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>).

Paragraph 8.18

The 'balanced judgement' referred to in paragraph 8.18, whilst consistent with NPPF policy with respect to non-designated heritage assets is misleading for the consideration of heritage assets

generally. To be in conformity with national policy, it is requested the text is amended so that the text accurately reflects the presumption that exists in favour of conservation.

Paragraph 8.19

The council requests that the information set out in paragraph 8.19 is updated to reflect the up-to-date list (as at August 2025) of locally listed buildings in Witcham parish. The February 2017 list that is referred to in paragraph 8.19 has been superseded and the most recent revisions applicable to Witcham parish were adopted in 2024. The list is available to view here <https://local-heritage-list.org.uk/cambridgeshire>

This shows that as at August 2025, there were five buildings and structures included on the Local List. These are:

- 32 High Street, Witcham
- Grange Farm, Silver Street, Witcham
- White Horse Inn
- Witcham House and boundary wall
- Witcham village sign

The council also requests that this part of the plan refers readers to the county-wide Cambridgeshire Local Heritage List Project found at <https://local-heritage-list.org.uk/cambridgeshire> This site is now the repository for East Cambridgeshire's locally listed buildings.

Appendix 1 'Example of Habitat Richness'

This appendix provides a description of the natural features and historic features on land located south of the High Street and east of The Slade. The information therefore provides important local context to the 'local distinctiveness' of Witcham which is referred to in Policy WHM 6, sub clause a).

Currently, however neither the policies in the plan or the supporting text to the policies refer directly to the text contained in Appendix 1. To reduce ambiguity in this respect and to assist with policy intention, amendments should be made to the plan, such as to Policy WHM 6 and/or its supporting text so that the information contained in Appendix 1 'Meadows south of the High Street and east of The Shade' is directly referred to as examples of respect to local distinctiveness and natural and historic features in the parish.

Appendix 4

The council requests that the information in Appendix 4 is updated to reflect selection criteria agreed for the current county-wide Cambridgeshire Local Heritage List Project. This information is available here <https://local-heritage-list.org.uk/cambridgeshire/assessment-criteria>

Similarly, the council requests that the information in the table shown on pages 44 and 45 is updated to contain the information applicable to the five locally listed buildings/structures.

Conformity with strategic policies

As a general comment, the Neighbourhood Plan policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 (as amended 2023) and national policy. The district council is therefore satisfied that the draft Neighbourhood Plan does not undermine its strategic policies and is capable of meeting the requirement for 'general conformity'.

Other obligations

Strategic Environmental Assessment

The district council issued an 'SEA' Determination Statement in June 2025 that concluded the district council considers that it is not likely that significant environmental effects will arise from the implementation of the Witcham Neighbourhood Plan. This document is included as one of the submission documents supporting the neighbourhood plan.

Habitats Regulations Assessment

The district council has issued an 'HRA' screening report that concludes likely significant effects on the integrity on any European site are not expected to arise from the implementation of the Witcham NP. For clarity, the following European sites were considered:

- Wicken Fen (part of the Fenland Special Area of Conservation (SAC) and a Ramsar site)
- Chippenham Fen (part of the Fenland SAC and a Ramsar site)
- Woodwalton Fen (part of the Fenland SAC)
- Ouse Washes (a Special Protection Area (SPA), a SAC and a Ramsar site)
- Devil's Dyke (a SAC)
- Breckland SAC and SPA

The screening report was initially prepared on 2 June 2025 and, following engagement with Natural England, subsequently updated on 4 July 2025.

The Witcham Neighbourhood Plan is therefore found by the district council not to breach the requirements of Chapter 8 and Part 6 of the Conservation of Habitats and Species Regulation 2017.

We trust the comments contained in this letter will be taken on board during the examination into the neighbourhood plan.



David Morren

Strategic Planning and Development Management Manager

East Cambridgeshire District Council

Appendix 1 – Letter regarding Witcham Neighbourhood Plan Regulation 16 consultation

In addition to the requested changes set out in the letter from East Cambridgeshire District Council, the following drafting errors have been identified

Reg 16 NP paragraph, page number etc...	Drafting error
Para 3.3	Typographical error at paragraph 3.3. 'romote'
Para 3.7	This paragraph covers the policies in the Minerals and Waste Local Plan where they are specific to Witchford Parish. In addition to the minerals safeguarding area, the Minerals and Waste Local Plan 2021 also safeguards the water recycling area at Headleys Farm, just off the A142. Policy 11 'Water Recycling Areas' in the plan is therefore applicable.
Para 8.3	The sub heading directly above paragraph 8.3 should probably read "Neighbourhood Plan approach to the built environment"?
Page 28, Community Action 2	The text under the heading for Community Action 2 'Rural Heat Network' does not appear to be the correct text.