# Witcham Neighbourhood Plan Regulation 16 consultation

East Cambridgeshire District Council (ECDC) published the draft Witcham Neighbourhood Plan for consultation under Regulation 16 of the Neighbourhood Planning (General) 2012 (as amended). The consultation took place between Thursday 17 July and Tuesday 2 September 2025. The table below sets out the comments received.

Number	Name of	Comments
	consultee	
1	Natural England	Summary by ECDC: Natural England does not have any specific comments on the plan.
		Full representation: please see full representation published on our website at:
		https://eastcambs.gov.uk/planning-and-building-control/planning-policy-and-
		guidance/neighbourhood-planning/neighbourhood-10
2	Cambridgeshire	Summary by ECDC: The county council have provided a number of comments from several
	County Council	services including the lead local flood authority.
		Full representation: please see full representation published on our website at:
		https://eastcambs.gov.uk/planning-and-building-control/planning-policy-and-
		guidance/neighbourhood-planning/neighbourhood-10
3	Historic England	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.
		Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.
		We would refer you if appropriate to any previous comments submitted at informal consultation and Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>

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	consultee	
		We would be grateful if you would notify us on <a href="mailto:eastplanningpolicy@historicengland.org.uk">eastplanningpolicy@historicengland.org.uk</a> if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.
4	National Highways	Thank you for consulting National Highways on the above mentioned Neighbourhood Plan.
		National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).
		It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.
		Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer <b>No Comment</b> .
5	National Gas	Regarding planning application at site location Witcham Neighbourhood Plan there are no National Gas assets affected in this area.
		If you would like to view if there are any other affected assets in this area, please raise an enquiry with <a href="https://www.lsbud.co.uk">www.lsbud.co.uk</a> . Additionally, if the location or works type changes, please raise an enquiry.
6	East Cambridgeshire District Council	This letter sets out East Cambridgeshire District Council's (ECDC) response to the submitted plan, which is being consulted upon until 2 September 2025.

Number	Name of	Comments
	consultee	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 <a href="https://www.gov.uk/check-long-term-flood-risk">https://www.gov.uk/check-long-term-flood-risk</a>

## Policy WHM 9 'Sustainable Building Practices'

Given the fact that entire eastern England region is classified as seriously water stressed <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a> 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 <a href="https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf">https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf</a> 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 (<a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a>).

## 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

Number	Name of	Comments
	consultee	
		The council requests that the information set out in paragraph 8.19 is updated to reflect the upto-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 <a href="https://local-heritage-list.org.uk/cambridgeshire">https://local-heritage-list.org.uk/cambridgeshire</a>
		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 <a href="https://local-heritage-list.org.uk/cambridgeshire">https://local-heritage-list.org.uk/cambridgeshire</a> 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

Number	Name of	Comments
	consultee	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 <a href="https://local-heritage-list.org.uk/cambridgeshire/assessment-criteria">https://local-heritage-list.org.uk/cambridgeshire/assessment-criteria</a>
		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.

Number	Name of consultee	Comments
		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:
		<ul> <li>Wicken Fen (part of the Fenland Special Area of Conservation (SAC) and a Ramsar site)</li> <li>Chippenham Fen (part of the Fenland SAC and a Ramsar site)</li> <li>Woodwalton Fen (part of the Fenland SAC)</li> <li>Ouse Washes (a Special Protection Area (SPA), a SAC and a Ramsar site)</li> </ul>
		<ul><li>Devil's Dyke (a SAC)</li><li>Breckland SAC and SPA</li></ul>
		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.
7	AJ Fleet representing owner of land known	<b>Summary by ECDC:</b> AJ Fleet have provided comments relating to plan content including four of the proposed planning policies.
	as 'four meadows located south of High St. and east of The Slade'	Full representation: please see full representation published on our website at: https://eastcambs.gov.uk/planning-and-building-control/planning-policy-and-guidance/neighbourhood-planning/neighbourhood-10
8	British Horse Society	This response to the draft Witcham Neighbourhood Plan 2024-2036 is being made on behalf of the British Horse Society (BHS)

Number	Name of consultee	Comments
	Consulted	Witcham village and its immediate environs is a horse-dense area. On the short stretch of unclassified road between Witcham and Mepal alone there are over fifty horses kept across three separate equestrian businesses, the largest being Witcham Equestrian Centre, a combined livery yard and riding school. This represents an extremely high density of vulnerable road users, including children, before even considering the needs of pedestrians or cyclists.
		There is an extensive Public Rights of Way (PROW) network suitable for equestrians around Witcham that has been recently further enhanced by a successful Definitive Map Modification Order (DMMO) application. This has resulted in a footpath being upgraded to a restricted byway. This new link in the PROW network is likely to increase the number of equestrians wishing to either ride out or drive (horse and carriage) in the area.
		Equestrianism is important not just as a leisure activity that supports physical and mental health at an individual level, but also as a vital contributor to the rural economy in terms of both employment opportunities and expenditure.
		The British Horse Society strongly supports the Neighbourhood Plan's expressed desire to address issues relating to the speed of traffic. A particular concern from an equestrian perspective is the previously mentioned unclassified road that links the villages of Witcham and Mepal. There was a horrific collision on this road in 2017 involving two horses and their riders and this led to the current improvements, namely the extension of the 30mph limit and the addition of a 40mph buffer zone on the approach to the village from Mepal. However, volume of traffic continues to grow and further measures to slow traffic would increase safety.
		The BHS strongly supports the extension of the PROW network through the creation of new links. The BHS would recommend that the minimum designation for any proposed extensions should be <i>Bridleway</i> and where possible <i>Restricted Byway</i> enabling equestrians to benefit from such proposals (Policy WHM 14- Public Rights of Way)

Number	Name of	Comments
	consultee	
		Where the Neighbourhood Plan is considering improving connectivity between villages for safe and easy travel by cycle or foot, the BHS would recommend the inclusion of horse riders in such planning. For example, if a signalised crossing over the A142 is being proposed, its design and construction should also be suitable for equestrians. If a combined foot/cycle path is being considered, then this is extended to include horse riders i.e. a Non-Motorised User (NMU) path is created.
		Thank you for the opportunity to comment.
		Claire Topping, Volunteer Access & Bridleway Officer, Ely Area
		If you would like further information regarding any of the points raised, please do contact Lynda Warth, County Access and Bridleways Officer, Cambridgeshire