

# **Witcham Neighbourhood Plan**

## **Parish Council response to Examiner's Clarification Note**

### **October 2025**

The Neighbourhood Plan Examiner published a Clarification Note on 30 September 2025. This paper provides the Parish Council's response to the questions raised in the Note.

#### **Policy WHM 1 – Spatial Strategy**

The Examiner asks whether there is any need for the use of the words 'in principle' in the first sentence of the policy?

#### ***Parish Council response***

The approach to writing the policy is to seek a level of consistency with other made neighbourhood plans in East Cambridgeshire whilst ensuring that it remains relevant to Witcham. To that end, the words 'in principle' are used in Policy SUT 1 of the Sutton Neighbourhood Plan and HAD 1 of the Haddenham Neighbourhood Plan.

#### **Policy WHM 2 - Affordable Housing on Rural Exception Sites**

The Examiner asks whether there is any need for the wording 'where housing would not normally be permitted' in the policy?

#### ***Parish Council response***

Again, the approach to writing the policy is to seek a level of consistency with other made neighbourhood plans in East Cambridgeshire whilst ensuring that it remains relevant to Witcham. To that end, the words 'where housing would not normally be permitted' are used in Policy SUT 6 of the Sutton Neighbourhood Plan and Policy CHEV 4 of the Cheveley Neighbourhood Plan.

#### **Policy WHM 8 – Flooding and Sustainable Drainage**

The Examiner suggests that he is minded to recommend that the first part of the policy is simplified so that it requires a proportionate approach to on-site drainage (rather than the submitted version which refers initially to all development and then highlights a proportionate approach). He asks if the Parish Council have any observations on this proposition?

#### ***Parish Council response***

As with the matters above, the Parish Council has sought to maintain a level of consistency with policies covering the same requirements in other made neighbourhood plans in East Cambridgeshire whilst ensuring that it remains relevant to Witcham. The first part of the proposed policy is the same as that in Policy SUT 21 of the neighbouring made Sutton Neighbourhood Plan and Policy CHEV 9 of the made Cheveley Neighbourhood Plan.

### **Policy WHM 11 – Heritage Assets**

The Examiner asks whether the wording used in paragraph 8.18 has regard to the elements of Section 16 of the NPPF which relate to designated heritage assets?

#### ***Parish Council response***

It is acknowledged that the NPPF only requires the ‘balanced judgement’ stated in paragraph 8.18 in respect of non-designated heritage assets (para 216), whereas the neighbourhood plan suggests such an approach would be necessary to all heritage assets. Paragraphs 212 - 215 of the Framework make it clear how proposals impacting on a designated heritage asset should be assessed.

The Parish Council therefore suggests that paragraph 8.18 could be amended to reflect that proposals affecting heritage assets will be determined in accordance with the Framework.

### **Policy WHM 12 – Buildings and Features of Local Heritage Significance**

The Examiner asks whether the first part of the policy has regard to paragraph 216 of the NPPF which takes a more balanced approach towards development proposals which would affect non-designated heritage assets?

#### ***Parish Council response***

Again, as with previous references above, the Parish Council has sought to achieve a level of consistency with other recently made neighbourhood plans in how proposals that could impact on a building of local significance is considered. However, it is acknowledged that paragraph 216 of the Framework requires that a balanced judgement is taken “having regard to the scale of any harm or loss and the significance of the heritage asset.”

### **Representations**

The Examiner asks for the Parish Council’s comments on the representations received at the Regulation 16 consultation stage and, in particular, comments by the District Council seeking a series of revisions to certain policies and the general text.

#### ***Parish Council’s response to representations***

The table below sets out the Parish Council’s response to the representations highlighted by the Examiner.

<b>Body</b>	<b>Parish Council response</b>
<b>Natural England</b> Natural England does not have any specific comments on the plan.	Natural England commented at the Pre-Submission consultation stage.  Nothing further to add
<b>Cambridgeshire County Council</b>    <b>Objectives</b>	Cambridgeshire County Council were consulted but did not comment at the Pre-Submission consultation stage    Noted

Body	Parish Council response
<p>The County Council make supportive comments on the objectives but do not identify any required changes.</p> <p><b>Policy WHM 4</b> The County Council is supportive of the policy.</p> <p><b>Para 7.9</b> The County Council suggests that the NP should consult with the Local Nature Recovery Strategy and include any relevant information in the final submission.</p> <p><b>Policy WHM 6</b> The County Council draws attention to their publication "Highways Development Management General Principles for Development"</p> <p><b>Policy WHM 8</b> The County Council, as lead local flooding authority, welcomes the policy but encourages reference to the NPPF and Planning Practice Guidance.</p> <p><b>Policy WHM 13</b> The County Council recommends that a specific youth consultation would be helpful when considering development of provision.</p> <p><b>Community Action 3</b> The County Council generally supports the approach in the Community Action but highlights a need to be aware of travel issues.</p> <p><b>Policy WHM 14 and Community Action 7</b> The County Council supports the policy and makes reference to Cambridgeshire's Active Travel Strategy.</p>	<p>Noted</p> <p>The NP has reached the final submission stage and it is likely that the examination of the Plan will have been completed before the final Strategy is published.</p> <p>Noted. It is not considered that the Policy needs to be amended in respect of this comment.</p> <p>The Parish Council does not consider it necessary for the policy to be amended to include these references.</p> <p>Noted. It is not considered that the Policy needs to be amended in respect of this comment.</p> <p>Noted. Given that the Community Action does not need to meet the Basic Conditions, the matter is not considered relevant to the examination.</p> <p>Noted. It is not considered that the Policy needs to be amended in respect of this comment.</p>
<p><b>Historic England</b> The body does not consider it necessary to provide detailed comments at this time.</p>	<p>Historic England commented at the Pre-Submission consultation stage.</p> <p>Nothing further to add</p>
<p><b>National Highways</b> National Highways make no comment</p>	<p>National Highways commented at the Pre-Submission consultation stage.</p>

Body	Parish Council response
	Nothing further to add
<p><b>National Gas</b> The agents acting on behalf of National Gas note that there are no National Gas assets affected in this area.</p>	<p>National Gas commented at the Pre-Submission consultation stage.</p> <p>Nothing further to add</p>
<p><b>East Cambridgeshire District Council</b> The District Council has no fundamental concerns with the content of the Plan and its policies. They consider that the policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 (as amended 2023).</p> <p>A number of detailed comments are raised to supporting paragraphs and the appendices.</p> <p><b>Policy WHM 9</b> The District Council supports the policy in relation to water consumption but considers that the supporting text should provide an explanation with respect to the 100 litres per person per day water consumption standard and refers to shared standards recently published by the Environment Agency and Natural England.</p>	<p>The District Council was consulted at the Pre-Submission consultation stage but, due to a lack of resources at the time, were only able to provide limited comments.</p> <p>The Parish Council is generally supportive of the comments in relation to amending the supporting paragraphs. It is considered that these amendments, which are generally for clarification, could be agreed in preparing the Referendum Plan without impacting upon whether the Plan meets the Basic Conditions.</p> <p>The Parish Council considers that the supporting text could be amended as suggested, subject to the consideration of the outcome of the examination of the policy itself.</p>
<p><b>AJ Fleet on behalf of landowners</b> AJ Fleet makes representations on behalf of the owners of the Four Meadows. It is believed this is the land identified in Map 12 but, given that a map of the land in question was not submitted with the representation, this cannot be confirmed.</p> <p>The representation suggests that "with sensitive design and mitigation, the site could deliver additional benefits for the Parish in accordance with national planning policy (NPPF) and the draft Neighbourhood Plan."</p> <p><b>Policy WHM 2</b></p>	<p>AJ Fleet did not comment at the Pre-Submission consultation stage on behalf of the landowners of the "Four Meadows".</p> <p>Any development proposals on sites outside the Development Envelope would need to conform with Policy WHM 1.</p>

Body	Parish Council response
<p>AJ Fleet state that their client's land could accommodate a modest affordable housing scheme and that, where viability requires, a limited proportion of market housing could be included.</p> <p><b>Policy WHM 4</b> AJ Fleet acknowledge the habitat richness and state that any proposal would seek to conserve and enhance these ecological assets. They also consider that the land has the potential to operate as a Biodiversity Net Gain (BNG) credit site.</p> <p><b>Policy WHM 5</b> AJ Fleet acknowledge the importance and protection of the most important views. They seek consistency between Map 6 and the Village Centre Inset Map in respect of the location of View 12.</p> <p><b>Policy WHM 10</b> AJ Fleet state that their clients site "may be suitable for small-scale renewable generation that contributes to local carbon reduction targets, while being carefully designed to safeguard visual and environmental assets."</p> <p><b>Other matters</b> AJ Fleet state that, "in addition to housing, biodiversity and renewable energy, the land could support community focussed initiatives such as educational projects or land-based enterprises."</p>	<p>The Parish Council notes this suggestion but neither considers it necessary nor support any amendment to the Plan to accommodate such a proposal.</p> <p>The Parish Council notes this suggestion but does not consider it necessary to make any amendment to the Plan to accommodate such a proposal.</p> <p><b>The Parish Council acknowledges that the location of View 12 (identified on Map 6) should be corrected on the Village Centre Inset Map.</b></p> <p>The Parish Council notes this suggestion but neither considers it necessary nor support any amendment to the Plan to accommodate such a proposal.</p> <p>The Parish Council notes this suggestion but neither considers it necessary nor support any amendment to the Plan to accommodate such a proposal.</p>
<p><b>British Horse Society</b> The Society "strongly supports the Neighbourhood Plan's expressed desire to address issues relating to the speed of traffic" and the extension of the PRow network.</p> <p>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.</p>	<p>The British Horse Society did not comment at the Pre-Submission consultation stage. The support is noted.</p> <p>The comment is welcomed. <b>The Parish Council would support amending Community Action 7 to refer to non-motorised user routes between villages</b></p>