

**Regulation 16 Consultation – Draft Witchford Modified Neighbourhood Plan**

ECDC published for consultation the draft Witchford Modified Neighbourhood Plan for the period 27 November 2024 to 14 January 2025. The table sets out all comments received during the publication period. A total of 8 were received. Original copies of the representations are held by ECDC.

Name	Comments
ECDC	<p>This letter sets out East Cambridgeshire District Council’s (ECDC) response to the submitted plan, which is being consulted upon to 14 January 2025.</p> <p>The District Council welcomes the Parish Council bringing forward this draft Modified Plan and, broadly speaking, the modified aspects of the Plan are considered to be well presented, with clear identification of what are policies and what is wider supporting text.</p> <p>This letter does not comment on all matters of the Modified Plan, but rather concentrates on those matters which we believe should be brought to the attention of the Examiner (once appointed).</p> <p>For the avoidance of doubt, ECDC makes no comment on those aspects of the Plan which are not proposed to be modified, as these are out of scope for the consultation and examination stage.</p> <p><b>Modification Plan</b></p> <p>On submission, and prior to consultation, ECDC was satisfied that it was clear to all parties that this is a modification proposal rather than a full replacement plan. ECDC publicised the plan accordingly.</p> <p>As duly required, the Parish Council submitted a Regulation 15 statement, which was also published as part of the consultation papers. That statement states that, in the opinion of the Parish Council, the proposed modifications are “<i>changes to be material modifications which would require examination</i>” but that the “<i>qualifying body does not consider that the material modifications change the nature of WNP1 [the adopted Neighbourhood Plan], therefore does not consider that a referendum is required to take place in addition to the examination.</i>”</p> <p>By virtue of Regulation 17(e) of The Neighbourhood Planning (General) Regulations 2012, ECDC is obliged to offer its views on this matter. It is the view of ECDC that the modifications proposed, being five new policies, do have a material effect so as to change the nature of the neighbourhood development plan; and that the changes are so significant that a referendum is likely necessary. We reach this opinion based on the fact that five new polies to be introduced would, in our opinion, be of</p>

Name	Comments
	<p>significance and will alter the way applications in the parish are to be considered. However, we of course defer to the Examiner (once appointed) to consider this matter.</p> <p><b>New 'Climate Change' Chapter</b></p> <p>ECDC has no objection to the principle of introducing such a chapter within a Neighbourhood Plan.</p> <p><b>Policy CC1</b></p> <p>ECDC welcomes the principle of such a policy, and its approach aligns with 'best practice' in other emerging or recently adopted Local and Neighbourhood Plans. We note that the various targets are not absolute 'requirements' to be met but instead are targets that the applicant must demonstrate how they have been considered and, where appropriate, incorporated. This appears to ECDC as a reasonable approach and allows flexibility to account for circumstances where one or more aspects of the policy cannot be met for good reason.</p> <p><b>Policy CC2</b></p> <p>A relatively straight-forward policy, and we raise no objections.</p> <p><b>Policy CC3</b></p> <p>BNG is now an established practice within ECDC's local planning authority function. We have no objection to the policy intent or its content, though by only 'encouraging' 20% BNG it is not likely to lead to any meaningful change in applications, because the default position would remain 10%.</p> <p><b>Policy CC4</b></p> <p>This is a comprehensive and well thought through tree related policy, which ECDC considers is deliverable through the planning system.</p> <p><b>Policy CC5</b></p>

Name	Comments
	<p>This is a carefully worded policy, which ECDC has particularly assisted the parish in crafting. We assisted so that the policy can comply, in our view, with necessary legislation and procedures, especially around HRA matters (noting that the parish's location is within a number of impact risk zones that surround several SSSIs and European protected sites). We therefore support the policy. However, in offering such support, we declare our interest in the significant involvement ECDC had in assisting the parish draft such a policy.</p> <p><b>Conformity with strategic policies</b></p> <p>As a general comment, the modified aspects of the Neighbourhood Plan 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'.</p> <p><b>Wider implications of the Modifications</b></p> <p>There does not appear to ECDC to be any conflict arising between the modified aspects of the Plan and the rest of the Plan which is not proposed to be modified. We therefore do not seek any consequential modifications elsewhere in the Plan.</p> <p><b>Other obligations</b></p> <p>As set out in the submission documents, the District Council issued a Determination Statement that concluded that the District Council considers that no likely significant environmental effects will arise from implementation of the Modified Neighbourhood Plan.</p> <p>The District Council sees no reason why the conclusions set out in the Statement do not remain valid.</p> <p>In conclusion, ECDC considers that the Modified Witchford Neighbourhood Plan is capable of satisfying the basic conditions and other relevant legal obligations.</p>
Environment Agency	Thank you for the consultation dated 03 December 2025. We have no further comments relating to this consultation. Please refer back to our previous letters referenced AE/2024/129294 and AE/2024/129722 (dated 06 March and 08 August) respectively.

Name	Comments
	<p>According to the Modification Proposal (Climate Change Single Issue Review) Regulation 15 Statement, the amendments seek to “Actively identify and promote climate change mitigation and resilience measures” and “delivering biodiversity net gain”.</p> <p>We trust this advice is useful.</p> <p><i>[note added by ECDC. The two letters referred to by EA are as follows:</i></p> <p><i>AE/2024/129294 (6 March) – this letter is not held by ECDC but is assumed to be referencing the EAs representation at the Reg 14 stage submitted to the Parish Council, which is referenced in the submitted Consultation Statement</i></p> <p><i>AE/2024/129722 (8 August) – this letter was submitted to ECDC as part of the consultation on the draft SEA report. It can therefore be found in full in the appendix of the submitted final SEA report.]</i></p>
<p>Anglian Water</p>	<p><b>Preamble</b></p> <p>Anglian Water is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012 and we support neighbourhood plans and their role in delivering environmental and social prosperity in the region.</p> <p>Overall, Anglian Water is the water supply and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.</p> <p>Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.</p> <p>Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - Strategic Growth and Infrastructure (<a href="http://anglianwater.co.uk">anglianwater.co.uk</a>) The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.</p>

Name	Comments
	<p>Anglian Water is committed to ensuring that development in our region continues to thrive while protecting our assets, existing customers and the environment. We want to ensure that growth aligns with environmental responsibilities and infrastructure capacity.</p> <p>Anglian Water delivers new water supply and sewerage services across our region to support sustainable growth for housing and economic development in the fastest growing region of England.</p> <p>There are areas in our region where our water and wastewater networks are at capacity. To remedy this Anglian Water will deliver over £5bn in new infrastructure between 2025-2030 including initiating development of two new strategic reservoirs, upgrading treatment facilities, extending our strategic water supply pipeline by nearly 700km, and numerous nature-based solutions such as wetlands and sustainable urban drainage schemes.</p> <p>The infrastructure we deliver is primarily funded in two ways, including:</p> <ol style="list-style-type: none"> <li>1) Developers pay infrastructure charges to connect to, and where necessary provide additional capacity for our water supply and sewerage networks, which are governed by Ofwat’s charging rules; and</li> <li>2) Water and sewerage charges agreed by Ofwat every five years, paid by our customers to fund our investment programme on past and future infrastructure to: <ul style="list-style-type: none"> <li>• Address a rapidly growing population;</li> <li>• Ensure we are resilient to impacts of climate change;</li> <li>• Enhance our environment to reach the environmental destination agreed with customers and regulators; and</li> <li>• Secure future water supplies.</li> </ul> </li> </ol> <p>Anglian Water’s plans are reviewed every five years and include business plans for our investments through the Water Resources Management Plans (WRMP) Water resources management plan and Drainage and Wastewater Management Plans (DWMP) Drainage and wastewater management plan and a Long Term Delivery Strategy (LTDS) Our strategies and plans. These provide a 25-year long term view to 2050, which also corresponds with the Government’s net zero commitment.</p> <p><b>Detailed response on Chapter 5.11 of the draft neighbourhood plan</b></p> <p>The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.</p> <p><b>Policy WNP CC1 - Delivering sustainable buildings fit for a net zero carbon future, which are resilient to the effects of climate change</b></p> <p><i>Water efficiency</i></p>

Name	Comments
	<p>Anglian Water has a statutory duty to supply water for domestic purposes only. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.</p> <p>Anglian Water’s water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies. See Water resources management plan (<a href="http://anglianwater.co.uk">anglianwater.co.uk</a>)</p> <p>To help protect the environment, the Environment Agency (EA) is reviewing abstraction licences and reducing the amount of water that businesses including Anglian Water can abstract from the environment. As a result, the gap between the demand for water and our supply (aka headroom) has shrunk.</p> <p>The current situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the WRMP. However, where our supplies allow, we will endeavour to help businesses in whatever way we can to meet their needs and continue to serve the communities and economies they support.</p> <p>To respond to both this challenge, and a growing population, Anglian Water is building a new strategic pipeline to move water around our region. We have also developed plans to build two new reservoirs to increase water supply. These solutions will take time to deliver, and so it is more crucial than ever that all homes and businesses are water efficient, to reduce the overall demand for water, to meet government targets and to ensure there is enough water to go around.</p> <p>For water supply for non-household use*, Anglian Water now has a threshold of 20m3 a day for consideration of whether meeting that commercial/ industrial request could jeopardise domestic supplies for households. This is due to pressure on water supplies because of abstraction reduction, climate change and a fast-growing population. As a result, the gap between the demand for water and our supply (headroom) has shrunk. Prospective applicants are advised to contact Anglian Water at <a href="mailto:planningliaison@anglianwater.co.uk">planningliaison@anglianwater.co.uk</a> to avoid situations where water intensive demand projects progress to site acquisition, design or planning applications without establishing that a water supply and wastewater solution is feasible.</p> <p>(*Water supply for toilets and welfare facilities, as well as firefighting fall with the domestic definition.)</p> <p>As a region identified as seriously water stressed, we encourage measures to improve water efficiency in developments. This can be achieved by a fixtures and fittings approach, including through rainwater/ storm water, harvesting and reuse, and greywater recycling. Such measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needing to be treated by our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.</p>

Name	Comments
	<p>Given the proposed national focus on water efficiency, Anglian Water encourages Local Plans and Neighbourhood Plans to cover this issue through a policy-based approach. Anglian Water has produced a Water Efficiency Protocol with other partners (the Environment Agency, Natural England and Cambridge Water) on the imperative for development plan policies to achieve tighter water efficiency standards than the optional standard of 110 litres per person per day (l/p/d) for new homes.</p> <p>This position is reinforced by the direction taken by the Government Department DEFRA which supports the need to improve water efficiency Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>) and the Government's Environment Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments, including consideration of a new standard for new homes in England of 100 litres per person per day where there is a clear local need, such as in areas of serious water stress. It has recently been announced by Government that a review of the Water Efficiency Standard(s) within the Building Regulations 2010 (Part G2 of the Approved Documents) will be consulted on in the next few months.</p> <p>It is appropriate that the neighbourhood plan include details in its policies to help shape the design of development in the area by promoting water efficiency. This should include positive features of water efficient fixtures and fittings, and through rainwater/storm water harvesting and reuse, and greywater recycling. In addition, if water efficiency measures are promoted, this will help reduce the amount of foul drainage from developments and lessen any pressure on water recycling centres.</p> <p>Anglian Water welcomes inclusion under this policy of the need to use water in a more efficient and sustainable manner. In supporting this approach, the following background is provided. We would advocate the neighbourhood plan seeks a high standard of water efficiency for new developments for the reasons set out above and includes a target standard i.e. 100 litres per person per day under Policy WNP CC1. If you wish to discuss this further or would like some assistance on the drafting of proposed wording, please do not hesitate to contact me.</p> <p><b>Policy WNP CC2 Protecting existing habitats in Witchford and seeking opportunities to strengthen parish-wide ecological networks</b></p> <p><b>Policy WNP CC3 Delivering Biodiversity Net Gain</b></p> <p>Anglian Water supports these policies in prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure.</p> <p>We would also support opportunities to maximise green infrastructure connectivity, including through opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens, for example.</p> <p>The reference to the work of the Local Nature Recovery Strategy for Cambridgeshire and Peterborough and how this is being progressed at a local level for Witchford is welcomed.</p> <p>Policy WNP CC2 identifies a number of networks of habitats to be protected and enhanced as shown on Map 15 (page 77). These areas include Anglian Water owned assets which are critically important water supply and wastewater infrastructure, as follows:</p>

Name	Comments
	<ul style="list-style-type: none"> <li>• A2 Long Drove corridor - The Witchford Water Recycling Centre (WRC) is located on the west side of Long Drove. It appears the Witchford WRC and underground sewer etc. pipes and associated easement either borders or partially falls within the A2 Long Drove corridor which is concerning. However, due to the scale of the map provided it is not possible to ascertain the extent of the proposed corridor. There is also a pumping station in the most southern section of the A2 Long Drove corridor.</li> <li>• C16 Green Corner Corridor – this may partially cross a main water supply pipe, although it is difficult to confirm from the plan provided. Again, the neighbourhood plan group should clarify the position on this matter.</li> </ul> <p>The neighbourhood plan group is strongly encouraged to clarify the position on this matter. These policies in the neighbourhood plan could potentially place an unnecessary policy burden which could limit our ability to bring forward planned investment/ engineering works needed to serve the local community. Some of these works may be necessary operational works and deemed as 'permitted development'. However, to ensure that we can undertake any necessary works/ enhancement of these assets, we object to their inclusion and request that these areas are removed from the proposed designations. I should be grateful if you could please contact me directly to discuss as the Anglian Water lead for neighbourhood plans. My contact details are provided in this response.</p> <p>For information, Anglian Water has already made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all Anglian Water owned land.</p> <p>Maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure (including both underground assets and aboveground assets such as pumping stations, water treatment and water works and water recycling centres) are available at: <a href="http://www.utilities.digdat.co.uk">www.utilities.digdat.co.uk</a>.</p>
Lead Local Flood Authority (Cambridgeshire County Council)	<p>I have reviewed the Witchford Neighbourhood Plan and have the following comments:</p> <p>It was noted that the group has acknowledged the flood risk in the Witchford area. It is important that there is a policy in place to address the flood risk in the Witchford Neighbourhood plan, this would be used to advise new developments of the minimum expectations in terms of drainage and aid to prevent developers from installing inadequate drainage systems.</p> <ul style="list-style-type: none"> <li>• It is recommended to include reference to the Cambridgeshire Flood and Water SPD to seek advice and guidance on surface water management in development. This document is adopted by East Cambridgeshire District Council. The SPD can be found on the following link: <a href="https://www.cambridgeshire.gov.uk/asset-library/Cambridgeshire-Flood-and-Water-Supplementary-Planning-Document.pdf">https://www.cambridgeshire.gov.uk/asset-library/Cambridgeshire-Flood-and-Water-Supplementary-Planning-Document.pdf</a> .</li> <li>• Reference can be made to our Surface Water Planning Guidance document which can be found at: <a href="https://www.cambridgeshire.gov.uk/asset-library/Surface-Water-Planning-Guidance.pdf">https://www.cambridgeshire.gov.uk/asset-library/Surface-Water-Planning-Guidance.pdf</a></li> <li>• Policy ENV 8 is of particular importance in the East Cambridgeshire District Council local plan (or any subsequent version of this plan) which can be found at: <a href="https://eastcamb.gov.uk/sites/default/files/2024-10/Local%20Plan%20adopted%2019%20October%202023%20-%20final%20with%20cover.pdf">https://eastcamb.gov.uk/sites/default/files/2024-10/Local%20Plan%20adopted%2019%20October%202023%20-%20final%20with%20cover.pdf</a></li> </ul>

Name	Comments
	<ul style="list-style-type: none"> <li>Reference can be made to Chapter 14 of the NPPF also, this can be found at:  <a href="https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf">https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf</a></li> </ul> <p>If you require assistance or a meeting regarding the Neighbourhood Plan, please let me know and we can look to arrange a time for a virtual meeting.</p> <p>If you require any clarification, please do not hesitate to contact me.</p>
Natural England	<p>Thank you for your consultation on the above dated 03 December 2024.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p> <p>We very much welcome the Parish Council's recognition of the importance in addressing the impacts and risks associated with climate change and our natural environment.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p>

Name	Comments
	<p><u>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</u></p> <p><b>Natural environment information sources</b></p> <p>The Magic (<a href="http://magic.defra.gov.uk/">http://magic.defra.gov.uk/</a>) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here (<a href="https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england">https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</a> )</p> <p>Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here (<a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making</a> ).</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic (<a href="http://magic.defra.gov.uk/">http://magic.defra.gov.uk/</a>) website and also from the LandIS website (<a href="http://www.landis.org.uk/index.cfm">http://www.landis.org.uk/index.cfm</a> ), which contains more information about obtaining soil data.</p> <p><b>Natural environment issues to consider</b></p>

Name	Comments
	<p>The National Planning Policy Framework (<a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>) sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance sets out supporting guidance.</p> <p>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</p> <p><b>Landscape</b></p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><b>Wildlife habitats</b></p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here <a href="https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england">https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</a>), such as Sites of Special Scientific Interest or Ancient woodland (<a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a>). If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><b>Priority and protected species</b></p> <p>You'll also want to consider whether any proposals might affect priority species (listed here <a href="https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england">https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</a>) or protected species. To help you do this, Natural England has produced advice here <a href="https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals">https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</a> to help understand the impact of particular developments on protected species.</p> <p><b>Best and Most Versatile Agricultural Land</b></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land</p>

Name	Comments
	<p><a href="https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land">https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land</a> .</p> <p><b>Improving your natural environment</b></p> <p>Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.</p> <p>Opportunities for environmental enhancement might include:</p> <ul style="list-style-type: none"> <li>• Restoring a neglected hedgerow.</li> <li>• Creating a new pond as an attractive feature on the site.</li> <li>• Planting trees characteristic to the local area to make a positive contribution to the local landscape.</li> <li>• Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.</li> <li>• Incorporating swift boxes or bat boxes into the design of new buildings.</li> <li>• Think about how lighting can be best managed to reduce impacts on wildlife.</li> <li>• Adding a green roof to new buildings.</li> <li>• Providing a new footpath through the new development to link into existing rights of way.</li> </ul> <p>Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here</p> <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> <li>• Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.</li> <li>• Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England’s Green Infrastructure Framework sets out further information on green infrastructure standards and principles</li> <li>• Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</a> ).</li> </ul>

Name	Comments
	<ul style="list-style-type: none"> <li>• Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).</li> <li>• Planting additional street trees.</li> <li>• Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.</li> <li>• Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).</li> </ul> <p>Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Defra's Biodiversity Metric and is available as a beta test version.</p>
Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b>, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other</p>

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	<p>indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.  <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p>

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	<p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>
National Highways	<p>Thank you for consulting National Highways on the modifications to the abovementioned Neighbourhood Plan.</p> <p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note 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>.</p>
Historic England	<p>Thank you for inviting Historic England to comment on the draft of the above modification to the Witchford Neighbourhood Plan.</p> <p>Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers - regarding how the place should develop over the course of the plan period.</p> <p>Paragraph 196 of the <a href="https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment">National Planning Policy Framework</a> &lt;<a href="https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment</a>&gt; (2023) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.</p>

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	<p>We welcome the general principle behind the modifications proposed for the Witchford Neighbourhood Plan, and support the Parish's desire to reinforce the plan's aims and objectives relating to the mitigation of and resilience to the effects of climate change. We have the following comments to make on the detailed policies proposed:</p> <p><u>WNP CC5 Supporting renewable energy infrastructure:</u></p> <p>General note on terminology: we note that the plan uses the phrase "very significant weight" when referring to the installation of renewable energy infrastructure. The NPPF places "significant weight" on these measures (paragraph 163-4), so we suggest modifying the language to align with the NPPF.</p> <p>Where proposals for renewable energy infrastructure would affect heritage assets, we highlight that visual impacts are not the only consideration when weighing up the proposals. As such, we recommend removing the word 'visual' from the 'Domestic Scale' paragraph and ask that the paragraph is modified to include consideration of potential historic environment impacts. We note that 'great weight' is applied to a heritage asset's conservation by the NPPF para 205, and that any harm should be clearly and convincingly justified.</p> <p>We draw your attention to the recently published Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency, which can be found here: <a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</a>. In particular, this advice recommends a 'whole building' approach when considering what interventions to undertake to improve either energy efficiency or introduce renewable energy micro-generation. We strongly recommend that reference is made to this advice note in the policy.</p> <p>A suggested additional wording is below:</p> <p><i>"Where proposals for renewable energy infrastructure affect heritage assets, special care must be taken to avoid or minimise harm to their significance. A 'whole building' approach is recommended in line with Historic England's advice. Where renewable energy infrastructure is proposed for a listed building, an assessment should be provided, either within a heritage statement, or as a standalone document, that sets out how the proposals have considered this approach. Historic England's advice note can be found here: <a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</a>."</i></p> <p>For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into neighbourhood plans, 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>.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>