

9th December 2018

Planning Services
East Cambridgeshire District Council
Fao Anne James

By Email and hard copy

Dear Planning Services Team,

18/01611/OUM

Proposed Residential Development involving the erection of 33 dwellings, proposed access arrangements and associated works

Site South Of 85 To 97 Main Street

1.0 Witchford Parish Council **objects** to the above planning application on the grounds set out below.

2.0 Landscape value

2.1 Witchford Parish Council disagrees with the applicant's assessment of the landscape value of this site. The Parish Council considers that the site has high landscape value within the context of the local setting, plays a highly important role in the local landscape and that the proposed development has a significant negative impact on the site and on its setting. The Parish Council cannot accept the description of the impact of the proposed development on this site as 'negligible', whereas in fact the effect of this development would be to transform this site and its setting.

The Parish Council has commissioned a Landscape Character Assessment ('LCA') of Witchford by an independent landscape architect. A copy of this document is Appendix 1 to this letter. Detailed discussion of the LCA is in paragraph 2.7.2 below.

2.2 Definition of 'value'

The Parish Council contends that substantial weight should be given to the views of Witchford residents in determining the value of this site.

2.2.1 The *Guidelines for Landscape and Visual Impact Assessment* 3rd Edition ('GLVIA3') definition of value is '*the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons*' (emphasis added).

- 2.2.2 The GLVIA3 definition therefore shows that value is relative to the esteem in which a site is held by society, and that the views of different stakeholders are valid. The Parish Council argues that the views of the community of Witchford should be given weight when considering this application because of the familiarity with this location arising from long use of the public areas running through and leading on from the site.
- 2.2.3 GLVIA3 also advises that *'the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape may also have value'* and that *'the value of individual contributors to landscape character, especially the key characteristics, which may include elements of the landscape, particular landscape features, notable aesthetic, perceptual or experiential qualities (emphasis added), and combinations of these'*.
- 2.2.4 Paragraph A1.13 of Appendix 1 to the applicant's Landscape, Townscape and Visual Impact Assessment ('LTV Assessment') confirms this by stating *'Other landscapes are undesignated, but valued locally for specific reasons or specific elements/features'*.
- 2.2.5 Paragraph A1.16 set out the considerations that are taken as relevant to the sensitivity of a landscape to change, and states *'For the purpose of this assessment, these terms are defined as... Value: the relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons'*.
- 2.2.6 This supports the Parish Council's contention that the site has value because of the way it is valued locally for specific reasons, namely the way it enhances the experience of walking public footpath No1, the aesthetic value of the views across the site from public footpath No1 (walked in both directions), the aesthetic views from Main Street across the wider landscape to the south of Witchford, the site's importance as part of a dwindling remnant of a historic landscape, and as part of a wider experience of tranquillity and of being in the countryside through its setting within the open space to the south of Witchford.
- 2.3 Local value
- This land is considered to be an essential asset to Witchford village by both residents and visitors. This site is highly valued by the Witchford community as the one remaining area of true countryside within the centre of the village, reinforcing Witchford's status as a rural community. The high valuation placed on this area reinforces the landscape value of the site under the GLVIA3 definition (paragraph 2.2).
- 2.3.1 The site provides a direct link via public footpaths to the wider landscape, where public access is available via the Millennium Wood, permissive paths and public access land including the Parish Council-owned community orchard on Grunty Fen Road. In

addition, the application site is more than just a means of access to the wider open space, but forms an integral part of bringing the countryside into the village.

2.3.2 Appendix 2 is a map showing the inter-relationship of the application site with the wider areas of open space south of Main Street Witchford. Appendix 3 describes the individual areas of open space and how they are used and appreciated by the local community.

2.4 Magnitude of change

Paragraph A1.18 of the LTV Assessment states that magnitude of change will depend on 'the loss or change in any important feature or characteristic or a change in backdrop to, or outlook from, a landscape/townscape that affects its character. The ... degree of contrast with the existing characteristics of the view ... can... influence the magnitude of the change in view'. Given that the proposed development will completely transform the existing characteristic of this site from rural to urban, will destroy the existing views from public footpath No1 and (by urbanising the entrance at Main Street) will remove the last meaningful element of countryside in the village core, the Parish Council cannot agree with the assessments in the body of the LTV Assessment about the impact of this development.

2.5 Requirement to protect valued landscape

Paragraph 170 of the NPPF states that '*Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes*'. The evidence available to the Parish Council, set out below and in section 3, shows that this site has high landscape value according to the definition in GLVIA3, discussed above. The Parish Council therefore considers that the District Council should seek to protect this site as a valued landscape as it is required to do by paragraph 170 of the NPPF.

2.6 Applicant's landscape assessment

The Parish Council rebuts the applicant's Landscape, Townscape and Visual Impact Assessment ('LTV Assessment'). The Parish Council's comments on the LTV Assessment are set out here.

2.6.1 **Introduction** paragraphs 1.12 and 1.13 – the Parish Council notes that the conclusions of the LTV Assessment are based on desk top review and one site visit only. The Parish Council contends that the views of residents, based on long use and familiarity with the site and its setting, should be given more weight, as set out in 2.2.

- 2.6.2 **Baseline Environment** paragraph 3.4 – the ‘third right of way’ referred to is public footpath No13 and not No19 as called in this paragraph and throughout the document. This inaccuracy should be noted.
- 2.6.3 Paragraph 3.6 – the description of the ‘small-scale paddocks, grassland, trees and 2.6.3 hedgerow boundaries of the Application site’ may be typical of the National Character Area 46, but are no longer typical of Witchford. The Parish Council contends that the local context of this site (including the proposed vehicular entrance off Main Street) and its situation as a last remnant of the historically typical landscape demonstrates its value.
- 2.6.4 Paragraph 3.17 – the Parish Council contends that the horse paddocks have high scenic value in the context of their setting on Main Street, acting as they do to bring the countryside into the centre of the village. While the LTV Assessment does acknowledge that the view corridor has value, the Parish Council points out that this value will be drastically reduced by the construction of a vehicular access road through this site with the concomitant lighting and street furniture, thus removing the benefit of the open country nature of this view from Main Street.
- 2.6.5 Paragraph 3.19 – as noted above, the ‘grassland and grazed fields subdivided by hedgerows’ are now uncommon in the Witchford landscape.
- 2.6.6 Paragraph 3.20 – the Parish Council cannot accept the statement that ‘*there are no ecological designations on the site and therefore (emphasis added) it has no more than medium/low value*’. A site can have value even if not designated, as otherwise any biodiversity that does not reach a certain ‘designation threshold’ would be discounted and given no value by society. The ecological value of this site is discussed in section 4 below.
- 2.6.7 Paragraph 3.23 – the LTV Assessment does not refer to the context of the application site (both the horse paddock and the main eastern field) as an integral part of the wider recreational landscape to the south of Witchford village and as detailed in Appendices 2 and 3 to this letter. The Parish Council contends that this context adds significant value to both parts of the application site and should be acknowledged and fully taken into account when assessing the value of the site. The Parish Council disputes the LTV Assessment of the recreational value of the site as ‘medium’, when it is clear that (as described in section 3 below), the Witchford community greatly values and appreciates the recreational aspects of the site and the wider open space that is reached via the site.
- 2.6.8 Paragraph 3.24 – the Parish Council disagrees with the LTV Assessment, which does not acknowledge the setting of the publicly accessible open spaces to the south of Witchford described in 2.3 above and in Appendices 2 and 3. The perception of this

open space as bringing the tranquillity of the countryside into Witchford village is clearly articulated by Witchford residents as set out in section 3. Below.

- 2.6.9 Paragraph 3.26 – the historic importance of this landscape type is set out in the Parish Council’s Landscape Character Assessment.
- 2.6.10 Paragraph 3.27 – the Parish Council disputes the LTV Assessment. Within the local context of Witchford, the Parish Council contends that the site has high landscape value. Valued aspects of the site include the recreational opportunities, its role in bringing the countryside into the centre of Witchford, the views from Main Street looking south, from FP1 looking south-east, but also from FP1 walking back from the south by the pond area (shown as ‘pond’ on Appendix 2), the feelings of tranquillity expressed by users, the connection through the site to the wider open space to the south and not only to Millennium Wood. The LTV Assessment has a limited view relating popularity to a ‘demonstrable physical attribute of the site or surroundings’. This ignores the GLVIA3 definition of value as including aesthetic, perceptual or experiential qualities. The Parish Council contends that if the full GLVIA3 definition of value is considered (see 2.2 and 2.3 above) then this site is highly valued.
- 2.6.11 Paragraph 3.28 – the Parish Council does not agree with the LTV Assessment. The Parish Council considers that this site has highly valued special qualities.
- 2.6.12 Visual Baseline paragraph 3.42 Viewpoint 3 – shows the open view from Main Street in the centre of the village that will be destroyed from this location by the development proposal.
- 2.6.13 Paragraph 3.44 Viewpoint 5 - shows the open view from FPNo1 that will be destroyed by the development proposal.
- 2.6.14 Paragraph 3.45 Viewpoint 6 - shows the view across the pond from FPNo1 that will be destroyed by the development proposal.
- 2.6.15 **Scheme Proposals** paragraph 4.3 – the Parish Council does not consider that the proposed landscape design is adequate mitigation for the loss of the existing landscape and ecological amenity, including the loss of the central hedgerow within the eastern field, trees and old outbuildings which provide actual and/or potential wildlife habitat.
- 2.6.16 **Assessment of Operational Effects** paragraph 5.4 – the site is intervisible from public footpath No1 and adds considerably to the aesthetic value of that footpath.
- 2.6.17 Paragraph 5.5 - this development, including the access road off Main Street, would destroy the value of this site as bringing the countryside directly to the centre of Witchford village and cannot be described as ‘minor’ or ‘low-key’. The Parish Council

does not consider 33 houses to be a small number of new residential properties. The Parish Council does not consider the loss of the important views to, from and over this site to be minimal; instead they would be transformative and have a significant detrimental effect.

- 2.6.18 Paragraph 5.6 –the western field brings the countryside into the centre of the village, and this effect would be destroyed by the provision of a road with lighting and street furniture.
- 2.6.19 Paragraph 5.7 – for the reasons outlined above and including all the additional evidence set out below, the Parish Council considers that this development on this site, including both the western and eastern fields, would have a significant effect.
- 2.6.20 Paragraph 5.8 – the impact of streetlighting on the Main Street streetscape from the proposed new road entrance to the development would be significant. There is currently no streetlighting and this allows an element of dark sky into the centre of the village. The extension of streetlighting and lighting from the houses all the way to the south of the eastern field would extend the influence of urban lighting over the open countryside to the south, which would have a detrimental effect on wildlife and the dark sky atmosphere of the location.
- 2.6.21 **Visual Effects** paragraph 5.12 – the Parish Council disagrees with the statements in this paragraph. The Parish Council considers that the visual effects of the new lighting columns on the access road would be significant and cannot be described as ‘negligible’.
- 2.6.22 Paragraph 5.28 – the Parish Council cannot agree with the assessment in this paragraph. The entrance to footpath No1 would be transformed by being placed alongside a vehicular road, thus urbanising the route.
- 2.6.23 Paragraph 5.29 – the new streetlighting would be a significant change from the current situation.
- 2.6.24 Paragraph 5.30 – the Parish Council notes that the LTV Assessment acknowledges that the view from public footpath No1 would be completely transformed to one of openness and countryside to a ‘constrained view within a residential development’, which would have a substantial effect.
- 2.6.25 Paragraph 5.31 – the night time effect of new streetlights and housing lights would be transformative and thus significant.
- 2.6.26 Paragraph 5.32 – as the LTV Assessment states ‘*Outbuildings, trees and grassland would be replaced by the new housing development. The village edge would extend closer to the viewer and would form the dominant element in the view, replacing the*

existing sense of openness (emphasis added)'. This clearly points to the significant detrimental effect this development would have on the site and the wider setting. Perimeter planting, even if sufficiently dense and of suitable species, would take a considerable time to grow to adequately screen the site and the Parish Council does not consider perimeter planting to override the disbenefits of the development.

- 2.6.27 Paragraph 5.33 - the extension of streetlighting and lighting from the houses all the way to the south of the eastern field would extend the influence of urban lighting over footpath No1 to the south, which would have a detrimental effect on the dark sky atmosphere of the location.
- 2.6.28 Paragraph 5.38 – the Parish Council cannot agree that the change in view would be a 'slight intensification'. Rather the view would be transformed negatively from open grassland to a built up area.
- 2.6.29 Summary of Operational Effects paragraph 5.45 – the Parish Council does not consider that the proposed landscape structure planting to be an adequate recompense for the loss of the value of this site as set out throughout this letter.
- 2.6.30 Paragraph 5.46 – there would be significant adverse effects on the wider community of Witchford and on walkers and pedestrians using the public footpath and roadside pavements from the new access road from Main Street into the site.
- 2.6.31 Paragraph 5.47 – the new access road into the site would destroy the value of bringing the countryside into the centre of the village.

Witchford Landscape Character Assessment

- 2.7 The Parish Council has commissioned an independent landscape architect to carry out a Landscape Character Assessment ('LCA') of this site sitting in the context of the surrounding landscape. This document is Appendix 1 to this submission (Witchford Neighbourhood Plan Landscape Appraisal Final Draft Report). The purpose of this commission is to provide a 'professional judgement' (LTV Assessment paragraph A1.10) on the landscape character of Witchford, sitting alongside but separate from the community's views.
- 2.7.1 The Parish Council considers that this document should be given as much if not more weight than the applicant's LTV Assessment. It was produced by an independent professional landscape architect and considers the application site in the context of its setting and the wider landscape of Witchford.
- 2.7.2 The LCA's recommendation is that the western field part of this development site and the open space continuing south from the development site should be designated as Local Green Space and that urbanising influences should be avoided.

- 2.7.3 The LCA emphasises the importance of the site as part of a historic field pattern which is now rare in Witchford. Paragraph 4.5.14 of the LCA states *‘All of these areas [the interconnected open space to the south of Main Street, including the horsefield, footpath No1 and the application site] fall within the Witchford Historic Core and Strip Pastures character area... which comprises the land south of the historic core of the village where there are tangible patterns of form stripfields and piecemeal small scale enclosures, typically found on the fringes of fen island settlements, and rare within the context of Witchford...the area forms a setting to the historic core of the village...add[ing] to the local distinctiveness and quality of the area’.*
- 2.7.4 The LCA refers to the importance of this site in its context at paragraph 4.5.16 which states *‘It is acknowledged that [this area of open space] comprises some linear areas of landscape which also rely on wider privately owned land/productive arable land as part of their character and enjoyment. Whilst the designation of Millennium Wood and The Horsefield as Local Green Space is fully supported, the wider landscape to the south and east is also considered important as an area of historic interest which is valued for its green infrastructure’.*
- 2.7.5 In relation to potential development at the area of Witchford in which the development site is located, the LCA specifically recommends (at section 5.2 pages 29-31 Guidance on Development):

‘Retain open views across The Horsefield and avoid urbanising influences on these views such as the introduction of new roads, signage and lighting’

‘Development in this area is likely to alter the relationship between the historic core of the village and its landscape setting and the small scale linear pastures which are a key characteristic immediately adjacent to the settlement edge. These qualities are tangible and easily appreciated through views from Main Street across The Horsefield and also from the public rights of way to the south of the village. The characteristics of this area should therefore be conserved and enhanced through land management and recreation initiatives for the benefit of the village community as a local asset and are sensitive to development.’

Specific sections of the Witchford LCA referring to the application site are:

Section	Page	Reference
Figure 3 Analysis	Between 17 – 18	Illustrates the locational importance of this site
4.2.3	18	<i>‘There are areas where the wider landscape setting of the settlement is readily perceived from within the built up area. In these locations the wider landscape can be said to penetrate the built form. These areas are particularly valued for helping to</i>



		<i>reinforce the small scale, rural character and location of the village and its historic origins and are illustrated on Figure 3.</i>
4.4.2	19	<i>'Views are critical in defining and reinforcing a sense of place and local distinctiveness, connecting places where people live with the wider environment and landmarks which can aid orientation.'</i>
4.4.4	19	<i>'Views from the edge of the village looking south: These views are from elevated positions looking out across the wider fen landscape to the south. Views are often vistas from within the built form or from public rights of way which run close to the existing urban edge. These views reinforce the rural context and origins of the settlement and connect it to the fen landscape which forms its wider setting. Close to the historic core these views may be intermittent and channelled by vegetation due to the smaller scale field enclosure pattern which is typical of the immediate setting of the village. In contrast views from the settlement edge in the west are more open giving rise to wider panoramas.'</i>
4.5.12 – 4.5.16	22-23	These paragraphs specifically address the designation of this site, and additional parcels of land to the south of Witchford, as Local Green Space. The conclusion is that <i>'It is clear therefore that this area of open space meets many of the criteria for Local Green Space Designation'</i> and <i>'the designation of Millennium Wood and The Horsefield as Local Green Space is fully supported'</i> .
5.2	29-31	<p>Detailed analysis of this site within its local setting</p> <p><i>'To the south the land slopes down from Main Street to the wider fen landscape forming the southern slopes of the island on which the village sits. The enclosure pattern on these slope reflects the small scale strip field enclosures associated with the rear of properties. These enclosures do not survive elsewhere in the setting of the village and in the context of the Parish are rare. They are of historical interest forming a distinctive setting to the settlement and reinforce the distinction between the character of the island and wider fen landscape. 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>Guidance on development:</p> <p><i>'Development in this area is likely to alter the relationship between the historic core of the village and its landscape setting and the small scale linear pastures which are a key characteristic immediately adjacent to the settlement edge. These qualities are tangible and easily appreciated through views from Main Street across The Horsefield and also from the public rights of way to the south of the village. The characteristics of this area should therefore be conserved and enhanced through land management and recreation initiatives for the benefit of the village community as a local asset and are sensitive to development.'</i></p> <p><i>'Retain open views across The Horsefield and avoid urbanising influences on these views such as the introduction of new roads, signage and lighting.'</i></p>
6.3.1	35	<p>Key Environmental Initiatives</p> <p><i>'Protect additional areas of green space including wide verge opposite Bedwell Hey Lane, gaps in built form along southern side of Sutton Road,</i></p>

		<i>historic strip enclosures south of historic village centre.'</i>
6.4.2	36	Management and Development Guidelines. <i>'Manage and improve areas of open space to reflect rural character of the village and its wider context - reduce night lighting, urban street furniture and municipal management.'</i>

3.0 Community value

3.1 Direct evidence of the importance of the application site to the Witchford community is available. Witchford Parish Council is working towards producing a Neighbourhood Plan for Witchford and as part of its evidence base the Parish Council carried out a household questionnaire in 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). The questionnaire was widely publicised, including holding a drop-in session on 20th February. The Parish Council believes therefore that considerable reliance can be placed on the results of this questionnaire.

3.2 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.

3.3 The questionnaire included the following questions:

Q1 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'.

Response – Agree 97.94%, Disagree 2.06%

Q5 Paths and open green spaces in and around the village should keep their rural character.

Response – Strongly Agree 91.40%, Slightly Agree 6.14%, Slightly Disagree 1.47%, Strongly Disagree 0.98%

Q6 The 'Horsefield' near the primary school between houses 97 – 105 Main Street must remain as a totally green space.

Response - Strongly Agree 73.41%, Slightly Agree 12.68%, Slightly Disagree 7.56%, Strongly Disagree 6.34%

- 3.4 In August 2018 Witchford Parish Council's Neighbourhood Plan Committee carried out a survey of users of the open space south of Main Street in order to gain direct evidence from residents about the use and public perception of the land. The responses are tabulated in Appendix 4. Sample quotes demonstrate how important it is to residents that this site brings the countryside into the heart of the village:

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

'You are in 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.'

And this quote reinforces the Parish Council's position that this land has landscape and community value in accordance with the GLVIA3 definition:

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

- 3.5 The Parish Council is of the view that the evidence cited in sections 2 and 3 of this letter supports the designation of the western field part of the development site as Local Green Space and calls upon the District Council to give this site the protection accorded under the NPPF to Local Green Space (also see section 7 below).
- 3.6 The Parish Council is of the view that the evidence cited in sections 2 and 3 of this letter demonstrates the significant community and landscape value of the eastern field part of the development site, and calls upon the District Council to protect this site as required under paragraph 170 of the NPPF
- 3.7 The Parish Council notes that there is no Statement of Community Involvement submitted with the application.
- 4.0 Ecology and Biodiversity
- 4.1 The Parish Council is aware that the Witchford Open Spaces Group is making a detailed submission on the ecological aspects of this application. The Parish Council draws your attention to that submission and requests that the Open Spaces Group's comments are given significant weight when determining this application, being based on long-term familiarity with the setting of this site.
- 4.2 In summary, the PC understands that the proposed development would mean a 67% loss of the mature hedgerows on the site, that the proposed mitigation measures are insufficient, that Great Crested Newt (a protected species) DNA has been discovered in the pond on the southern boundary of the site and there are multiple recent

confirmed reports of Great Crested Newts at a nearby location but that the proposals will result in the loss of a significant area of Great Crested Newt habitat, there are recent reports of reptiles found on nearby locations, that bats are likely to be present on the site and so appropriate permissions must be sought, the development will introduce artificial lighting which will negatively affect bats and other fauna, habitat for barn owls will be lost, the pond on the southern boundary of the site has the potential to support water voles.

5.0 Flood Risk and Pollution

5.1 The Parish Council is disappointed that the application makes insufficient use of SUDS. The only SuDS feature is 600 m³ of storage in underground crates. Some silt will be removed but then has to be disposed of. Other surface water pollutants such as oil and car-washings typical in suburban areas will remain in suspension and will be discharged directly into the receiving watercourse. As a pollution control measure the underground crates will not achieve the effectiveness of a retention basin. Swales and detention basins are important for conveyance and storage even where infiltration does not occur, reducing pollutant levels by natural processes and allowing evapotranspiration. As well as inadequate SuDS provision, there are no propositions for what body is to undertake this maintenance for the next 25 years and more, and who will pay.

5.2 The lowest part of the site is 7 - 8 m below the foul sewer in Main Street, which means that sewage will have to be pumped.

5.3 With regard to paragraph 9.12 of the Flood Risk Assessment Report, reference to the topography and layout show that the flooded area could impinge on the nearest houses, which are within a few metres of the watercourse.

6.0 Status of 'public body' and protection for open space

6.1 The Parish Council notes that this application provides for the gifting of the western field (the 'horsefield' designated as Local Green Space in the Draft Local Plan) to a public body to be held as open space. The Parish Council has significant concerns about the status of the 'public body', as this is not detailed in the application. The Parish Council strongly urges that legally binding protection is put in place to ensure this land remains public open space in perpetuity. This land should be gifted to the Parish Council as the public body best placed to protect and enhance the site for the benefit of Witchford residents and the wider public.

7.0 Education

7.1 The Parish Council notes that provision of part of the eastern field on this site for the expansion of the Witchford Rackham Primary School included in the previous

application 18/01336/OUM no longer applies in this application 18/01611/OUM. The Parish Council therefore questions the need for the education provision in 18/01336/OUM.

- 7.2 The Parish Council does not consider it is appropriate to build new houses with gardens backing directly onto a primary school playing field.
- 8.0 Development Envelope
- 8.1 The Parish Council notes that this development site is outside of the village development envelope that will be in place once the East Cambridgeshire Draft Local Plan is adopted, anticipated for April 2019.
- 9.0 Traffic and road safety
- 9.1 The Parish Council is very concerned about the impact that the traffic generated by 31 additional houses would have on traffic volume and road safety on Main Street Witchford. The entrance road to the site would occupy a length of Main Street that is regularly used for parking by cars used for conveying children to and from the school. The vehicular entrance to this site is also close to the main arterial junction in Witchford at the Main Street/Common Road junction.
- 9.2 In November 2016 Witchford Parish Council commissioned Automatic Traffic Counts at five locations in Witchford, including at Main Street at a point 220m east of Rackham Primary School. The raw data is available for public scrutiny on the Witchford Parish Council website at <http://witchfordpc.org/traffic-plan/>.

Summary data for traffic volumes recorded at the Main Street count site are:

Traffic flows were recorded over a seven-day period between 04/11/2016 and 10/11/2016, with traffic volumes reported over a 24 hour period for each day.

Monday – Friday: An average of 5198 vehicles passing the monitoring point on Main Street over a 24-hour period.

Daily Totals:

Monday – 5288

Tuesday – 5147

Wednesday – 5204

Thursday – 5300

Friday – 5052

Peak Periods:

These were between the hours of 08:00 – 09:00 and again between 17:00 – 18:00.

08:00 – 09:00 - An average of 634 vehicles passing the monitoring point on Main Street during this period on weekdays.

17:00 – 18:00 - An average of 438 vehicles passing the monitoring point on Main Street during this period on weekdays.

- 9.3 Existing planning permissions in Witchford to the west of the application site total 68 dwellings. It is likely that most of the traffic from these dwellings will travel east along Main Street past the Rackham Primary School. This application for 31 dwellings would therefore increase by an additional 50% the potential traffic volumes from new dwellings along an already road, including past the primary and pre-school entrance.
- 9.4 The Parish Council has been successful two years running in obtaining funding from the County Council Local Highways Improvement Fund (LHI) for road safety improvements on Main Street at the Common Road junction and outside Rackham Primary School. This funding has been obtained directly because of the road safety issues of traffic speed and traffic volume on Main Street. Appendix 5 is the text of the Parish Council's 2017-18 bid to the LHI fund. Appendix 6 is the text of the Parish Council's 2018-19 bid to the LHI fund and Appendix 7 is the County Council Panel results, showing the importance placed on this scheme.
- 10.0 Sustainability and village infrastructure
- 10.1 Witchford Parish Council considers that cumulative piecemeal development in Witchford has a significantly negative impact on infrastructure in the village and the wider area. This is most particularly seen in the stress placed on the A142 and A10 by increased traffic volumes.
- 10.2 The Ely to Cambridge Transport Study January 2018 (Cambridgeshire County Council and Greater Cambridge Partnership) states:
- 'Because of their position linking these [Cambridge] employment sites to residential areas in Ely and beyond, the road and rail links in the study area are already very busy, particularly at peak times, when there is extensive congestion. There is limited capacity to accommodate further travel demand on this key corridor, which will impede further economic and housing growth if not addressed.'*
- 10.3 The Cambridgeshire County Council A142 Road Safety Route Study September 2017 notes *'the significant increase in the volume of traffic'* using the A142, and states that the section of the A142 between the roundabout with Witchford Road/Lancaster Way to the A10 roundabout has seen a 56% increase in the volume of traffic since 2010.
- 10.4 Witchford residents expressed their concerns about the impact of housing development on infrastructure in their responses to the February 2018 questionnaire

(see 3.5). 164 respondents made additional textual comments at the end of the questionnaire. 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 and the need for a GP facility in Witchford.

- 10.5 Witchford Parish Council therefore contends that this application is not sustainable, as the 'adverse impacts of doing so would significantly and demonstrably outweigh the benefits' (NPPF paragraph 11(d)(ii)).
- 11.0 Weight to be given to Emerging Local Plan
- 11.1 Emerging policies that are relevant to the application in terms of considering whether the site is appropriate for residential development are Witchford1, Witchford2, Witchford3 and LP29.

Policy Witchford1: Proposals in Witchford.

Development proposals in Witchford which directly contribute to maintaining and/or expanding the community facilities present within the village will, in principle, be supported.

Proposals should respect the local character of the village, such as building height, roof pitch and window size.

The protection of open spaces and key views to the countryside are of particular importance to maintain the distinct character of the village.

Witchford2: Infrastructure and Community Facilities.

To assist meeting and in accordance with the requirements set out in Policy LP16, development proposals in Witchford should consider whether it is appropriate and necessary to contribute towards one or more of the identified priority infrastructure items below (listed in no particular order). The contribution could either be direct provision on-site or through developer contributions for off-site provision. The scale of contribution, if deemed necessary and appropriate, should be proportionate to the scale of development proposed.

- a. Provision of additional primary education facilities;
- b. Expansion of secondary education provision at Witchford Village College;
- c. Capacity improvements to the A142/A10 roundabout and Lancaster Way roundabout (A142 / Lancaster Way / Witchford Road);

d. Traffic management to reduce congestion and deter A142 traffic from using village as a 'rat-run';

e. Improved public transport services to Ely City Centre and rail station;

f. Improvements to pedestrian/cycle routes, including:

Increased footpath widths with shared provision for pedestrians and cyclists;

Cycle priority space at road junctions;

Improvement to crossing facilities at Lancaster Way roundabout and A10/A142 roundabout to provide greater connectivity between Witchford and Ely;

Continue to invest in cycleways to improve connectivity from villages in west of district to Ely, via Witchford;

Improvements to public rights of way and bridleways to improve access to the countryside for pedestrians, cyclists and horse riders.

g. Provision of retail to enable day-to-day needs to be met within the village;

h. Improvements to sports provision and open space including:

New netball courts at Bedwell Hey Lane recreation Ground:

Improvements to Victoria Green Park;

Improvements to Common Road play area.

Witchford3: Allocation Sites (extract)

Ref WFD.LGS7

Site Address Horse Meadow, Main Street

Area (Ha) 1.7

Site Specific Requirements See Policy LP29

Policy LP29: Conserving Local Green Spaces

Areas allocated on the Policies Map as Local Green Spaces will be protected from development in line with NPPF, which gives Local Green Spaces the same status as Green Belt land. Proposals will only be supported if they enhance the Local Green Space and are demonstrably supported by the local community.

11.2 The weight to be attached to these emerging policies is required to be assessed in accordance with the Planning Practice Guidance, which advises the following:



"What weight does an emerging Local Plan carry in decision-making?"

The National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework."

(Paragraph: 019 Reference ID: 12-019-20140306)

11.3 Stage of preparation of the Plan

The Submission Local Plan represents the culmination of the Council's work in preparing a new Local Plan, which it considers to be sound. That work involved specific rounds of consultation on the initial Preliminary Draft Local Plan, the Further Draft Local Plan and the Proposed Submission Local Plan. The consultation responses helped refine the policies and allocations into the Submission Local Plan, which recently concluded its Examination process and is now awaiting the Inspector's report. The Local Plan is therefore at a very advanced stage of its preparation and can be afforded significant weight.

11.4 Extent to which there are unresolved objections to the relevant policies

The only objections to the policies, in terms of their relation to the application site, are from the applicants themselves, who wish to see the site allocated for residential development and not as a Local Green Space. Given the advanced stage of the emerging Local Plan, the proposed Local Green Space cannot simply be ignored. Its designation should properly be concluded through the Local Plan process and in this respect the application is premature.

RPS on behalf of the applicants also provided Local Plan representations to the Council's document "Roles and Responsibilities in Planning for Education provision" (document ED026). The RPS representation notes that the removal of draft Policy WFD.M1 from an earlier draft of the Local Plan also removed the provision of a new primary school, but acknowledges the Council's statement in that document (Annex 1.8) that the planning applications for the sites which have subsequently been allocated for development in the Submission Plan have succeeded without the need for additional education provision in the village. We understand that this is due to the Rackham Primary School currently taking children from outside its catchment, meaning that the new developments will simply backfill the capacity of the school from the within the village over time.

Policy Witchford2 does not require the provision of additional primary educational facilities. When read correctly, the Policy actually requires that development proposals in Witchford should consider whether it is "appropriate and necessary" to contribute towards such provision. There is no evidence that such provision is necessary, other than as a result of this application. Rather than providing expansion space for the school to meet a need, the expansion space would only be needed in the event that this application is granted permission, since it is only this application that tips the balance towards a need for additional school capacity. This is confirmed in the

County Council's Growth and Infrastructure response to the previous application 17/02217/OUM. There is therefore no wider benefit from the application proposal, which simply meets its own generated need. It is anticipated that the County Council response would be the same for its application, although was not on the Council's website at the time of writing.

11.5 Degree of consistency of policies with policies in the NPPF

NPPF paragraph 35 states that Local Plan examinations include assessing whether they are "sound". The tests of soundness include whether the Plan is consistent with national policy. The Plan can only be submitted for examination by the Council once the Council considers it so, which means that it must consider the policies to be consistent with the NPPF. Indeed, Policy LP29 specifically refers to the NPPF in its wording. The Council has subsequently defended the Submission Plan's policies through the examination process and awaits the Inspector's report.

11.6 In light of the above, the emerging Local Plan can therefore be given significant weight in the consideration of this application, and the Council has no reason to depart from the above-mentioned policies in the consideration of this application.

11.7 S38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. The emerging Local Plan is not the development plan, but is itself a significant material consideration, particularly given the advanced stage in its preparation. No other material considerations have been put forward in the application that suggest the decision should be made other than in accordance with those emerging policies

Yours sincerely,

Mrs A Hodges
Clerk to Witchford Parish Council

18/01611/OUM

List of Appendices

1. Witchford Neighbourhood Plan Landscape Appraisal Final Draft Report.
2. Map showing the inter-relationship of application site with the wider areas of open space south of Main Street Witchford.
3. Text describing the individual areas of open space and how they are used and appreciated by the local community.
4. Summary of responses from August 2018 survey of users of the open space south of Main Street.
5. Text of Witchford Parish Council's 2017-18 bid to the Cambridgeshire County Council LHI fund
6. Text of Witchford Parish Council's 2018-19 bid to the Cambridgeshire County Council LHI fund
8. Cambridgeshire County Council 2018-19 LHI Panel results.