

## Appendix 1

### South Cambridgeshire District Council's response to the consultation on the submission version of the Fulbourn Neighbourhood Plan

1. South Cambridge District Council (SCDC) is taking the opportunity, through the Regulation 16 consultation, to comment further on the Fulbourn Neighbourhood Plan.
2. SCDC has worked with Fulbourn Parish Council (PC) during the preparation of the plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. There have been some meetings with the neighbourhood plan team to discuss the plan as it has evolved. This plan made good progress during the lockdown last year.
3. SCDC notes that the Submission version of the Fulbourn Neighbourhood Plan has been subject to quite a bit of revision and rewriting since the pre-submission consultation at the start of 2021. SCDC submitted a number of comments during this earlier consultation most of which have been taken on board during the review which we welcome.
4. The comments we make now concentrate on matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions.

### General overarching comments

#### Fulbourn Conservation Area Appraisal

5. In parallel with the pre-submission public consultation of the Plan SCDC was carrying out a consultation on the revised [Fulbourn and Fulbourn Hospital Conservation area appraisal](#) (CAA). This appraisal was adopted in September 2021 and we consider needs to be mentioned within the Plan. Amendments to the conservation area were made in this new appraisal – it would be helpful if the new boundary were shown within the Plan or mention that they have changed from those shown in Figure 2.
6. The CAA includes a list of possible non-designated heritage assets as well as a map showing buildings that make a valuable contribution to the overall character of the Fulbourn conservation area. The buildings identified as non-designated heritage assets have been included in Policy FUL/05 Protecting and Enhancing Village Character but are not listed or shown on a map. We consider this a missed opportunity. A map is included in the CAA which could be added to the Plan. The policy is relying upon the future user of the Plan cross referring to the CAA.

## Extant planning permissions

7. Within the Fulbourn Neighbourhood Area there are some large schemes where outline planning permission has been given by SCDC and reserved matters are still to be considered. We wish to ensure that the policies contained within the neighbourhood plan take into account /are complementary to these permissions and do not adversely attempt to over-ride them. For example, that for the Fulbourn and Ida Darwin Hospital sites which are identified for redevelopment in the adopted Local Plan – Policy H/3. We will specify within the comments below for each policy where we consider it appropriate that changes should be made.
8. For information here is a list of the relevant planning applications:
  - The Ida Darwin outline consented application for 203 dwellings is planning ref: S/0670/17/OL  
<https://applications.greatercambridgeplanning.org/online-applications/applicationDetails.do?keyVal=ZZZY1QOITV905&activeTab=summary>
  - The 'live' Reserve Matters application for this is planning ref. 20/05199/REM  
<https://applications.greatercambridgeplanning.org/online-applications/applicationDetails.do?keyVal=QLH5IEDX0DA00&activeTab=summary> It has a status of 'waiting decision'
  - The land east of Teversham Road outline consented application for 110 dwellings is planning ref: S/0202/17/OL  
<https://applications.greatercambridgeplanning.org/online-applications/applicationDetails.do?keyVal=ZZZY1ROITV415&activeTab=summary>
  - The Reserve Matters application for this one is ref: S/3290/19/RM. According to the public access website, it was refused in October 2021:  
<https://applications.greatercambridgeplanning.org/online-applications/simpleSearchResults.do?action=firstPage>

## Comments on the draft Plan in plan order

9. The following comments are made working our way through the document. Where we have already made a general comment, we will try not to repeat this in the section below.

### 3 Planning Policy Framework

10. Figure 2. The policy designations from the Local Plan used in this map do not use the correct terms. e.g., Village Amenity Area should be Protected Village Amenity Area. We would suggest that such corrections should be made to the Plan post examination and ahead of the referendum to avoid confusion with the different designations

## 4 Local Context

- 5 Paragraph 4.44 - There's a very minor typo – include 'which has a ditch with *an* important vascular and nationally scarce plant.' It would be helpful to also include the common name 'Fen pondweed' for clarity.

## 6 Protected Village Setting and Separation

### Policy FUL/01 Protecting the Distinctiveness and Landscape Setting of Fulbourn.

- 6 The supporting text to Policy FUL/1 has undergone much change since the Regulation 14 consultation. It more clearly describes the intensions of the policy setting out clearly the difference between the different elements in the policy for protecting the setting of Fulbourn – the important visual gap, important countryside frontages and the locally important views. This is to be welcomed.
- 7 Part 2 of policy –There should be a reference to the map that the Important Visual Gap is identified on '...as shown on Map 9 and the Policies Map'. We welcome that Figure 9 is consistent with the current Ida Darwin application.
- 8 Part 4 of policy –Part 5 of the policy explains the role of these views and we consider this wording should sit within the same section of the policy as the list of views. It should be noted that planning policy cannot control agricultural land uses or retain woodland unless it includes protected trees or is an ancient woodland.

### Policy FUL/02 – Development Outside the Development Framework.

- 9 Part 1 – This is repeating the Local Plan policy for development frameworks and does not, in our view, offer anything specific to Fulbourn. (Policy S/7 Development Frameworks).
- 10 Part 2b – We consider that this criterion should have a caveat regarding tree surveys and allowing for essential works to improve woodlands/trees and removal of dangerous trees.
- 11 Part 2c - The policy mentions 'appropriate levels of street lighting' but does not explain in the supporting text what would be appropriate. How would a planning officer know what is appropriate in determining a planning application?
- 12 Should there be a definition of what is meant by dark skies? Nowhere around Cambridge is a designated dark sky zone so should a different term, such as minimising light pollution arising from new development, be used to improve the darkness of certain areas? There may also need to be a consideration of the balance between lighting and safety.
- 13 Part 2d – How would this criterion be achieved to maintain in perpetuity a soft outer edge to Fulbourn?

## 7 Enhancing Rural Environment

- 14 Paragraph 7.8 – This paragraph could be updated to reflect that the Environment Act has Royal Assent. Wording such as the following could be added to the Plan – ‘The Environment Act 2021 has introduced a requirement for all developments in England to deliver ‘biodiversity net gain’ of at least 10%. There will be a transition period of two years to enable Natural England to establish the delivery mechanisms.’
- 15 The supporting text has been changed a lot from the version of the Plan consulted upon at Regulation 14. A new policy has been added. SCDC has concerns that this policy has not been subject to full consultation prior to submission and could be considered a major change to the Plan. Development proposals are being asked to contribute towards the creation of an extended Green Infrastructure Network. In the previous Plan this was a simple criterion in Policy FUL/04 Protection and Enhancement of Nature Features - 2b.

### **Policy FUL/03 Creating a Connected Green Infrastructure Network.**

- 16 The policy is supported by Figure 11 which shows an indicative green infrastructure network. Whilst supporting the principle of showing clearly the green infrastructure within the parish, we have concerns that this is the first time such a map has shown the extent of this infrastructure in the Draft Neighbourhood Plan. The supporting text to this policy sets out a clear narrative as to why such an infrastructure would be important including relevant studies that promote such greening, but this is new information to the plan.
- 17 The inclusion of a connected green infrastructure network is welcomed. With support and advice from the Wildlife Trust for Beds, Cambs and Northants, this network has the potential to contribute to the Nature Recovery Network to be developed in Cambridgeshire in line with the requirements of the Environment Act 2021.
- 18 Part 1 of the policy – It is not clear how development proposals could contribute towards the creation of an extended Green Infrastructure network. Since much of the network is outside of the built-up area of the village over agricultural land within the Green Belt what development in the future on this land would be expected to contribute to the creation of the network? Planning practice guidance notes that planning obligations should only be used where it is:
  - necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- 19 These tests are set out as statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. It is not clear how the intent of the Policy could be achieved by applying these tests.
- 20 Part 1 – final sentence – We are unsure what is meant by the term ‘potentially’ comprise – this implies uncertainty of what is included in the green infrastructure.

- 21 Part 1a – e – It is unclear whether all these features are included in Figure 11. We consider that these features should be clearly identified as they are included within the policy. Within (a) where are all the existing accessible open space? What is meant by designated green space – the local green space and Protected Village Amenity Areas? Which wildlife sites – ones designated? In (b) what is natural greenspace? In (c) where are the new green spaces and habitats – are these shown in Figure 11? In (d) are the permissive countryside routes shown? In (e) such areas of open space could be extensive.
- 22 This section could emphasise linking and improving connectivity, for example between locally protected sites, such as County Wildlife Sites, and nationally protected sites, such as SSSIs'. The terms 'designated green spaces' and 'wildlife sites' are rather vague. Where are the green spaces designated and are the wildlife sites designated anywhere?
- 23 Part 2 of the policy – The areas shown on Figure 11 indicating the network covers much land around the parish. It extends over both the Fulbourn and Ida Darwin hospital sites- this policy must take account of the existing planning permissions on these sites. Any future development within the parish would be impacted by this policy which strengthens our concerns about the specific lack of consultation on its detail.
- 24 Part 3 – How would this be achieved? Would creating such legal agreements make for a viable policy? Who would take responsibility for managing and maintaining the network on private land – SCDC? Parish Council? Wildlife Trust? The policy is unclear. It would be better to state that Green Infrastructure provided as part of a development will be retained through conditions.
- 25 Figure 11 – There a number of features shown on this map where it is not clear what they represent. What are 'Possible new habitats/natural greenspace (Wildlife Trust)'? Are these explained within the Plan? Is the intention that they are protected/created within Policy FUL/03? Where are the sources for the 'Existing Habitats and Woodlands'? Many of the areas shown are outside of the designated neighbourhood area. Whilst recognising that a green network does not stop at the border of a parish a neighbourhood plan cannot have a policy that extends beyond its neighbourhood area.
- 26 Figure 11 – We are concerned that the 'indicative green infrastructure network seems not to have a clear boundary on the map but rather has a symbol that fades in and out of focus. We will need clear boundaries to add into a policies map, so it is clear what areas are within the influence of the policy. Does the use of the term 'indicative' imply the network does not have a clear geographical layout?
- 27 Figure 11 – It is unclear from the map what routes are for ecological movements versus those for sustainable transport like walking or cycle routes.

- 28 Figure 12 – The key to this map is similar to that of Figure 11 but it also includes ‘Other green spaces’. Are these protected in the Plan? It is unclear what these areas are.

#### **Policy FUL/04 Protection and Enhancement of Natural Features.**

- 29 Part 2c – Mention could be made in the supporting text to this policy to highlight the Local Plan Policy SS/8 Sustainable Drainage Systems. Currently this criterion has no supporting text to explain why it is included in a policy.
- 30 Part 3 – We had previously asked for justification to be included in the supporting text as to why this section of the policy relates only to new developments of 10 units or more. The NPPF defines a major housing site as being of ten or more or a site with an area greater than 0.5 hectares. We were concerned that the policy needed to be more flexible so that it takes into account if a developer submits a scheme for 9 dwellings and then a subsequent scheme for 8 which is equivalent to over 10 but not covered by your policy. We would suggest that the Policy would be clearer if the first line made reference to 0.5 hectares as well as 10 dwellings.
- 31 Part 3a – How does this link to the new policy FUL /03 that creates the Green Infrastructure? In the Regulation 14 version of the Plan this was the only element asking developers to contribute to a green infrastructure which had not been shown on a map. Habitat to promote a net gain in biodiversity is within FUL/03 1c – is this duplicating?
- 32 Part 3b – As with Part 3a of this policy it is unclear how this relates to the new policy FUL/03. Are the new areas of ‘Natural Greenspace’ those that are identified in Figures 11 and 12? Are these greenspaces formed as part of the development or is there an expectation for off-site contributions? There is no explanation in the supporting text as to what is meant by ‘Natural England’s definition of ‘Accessible Natural Greenspace’. On Figures 11 and 12 these ‘new habitats’ are outside the built area of the village where development of any scale would not be expected to take place.
- 33 It is suggested that the supporting text makes reference to the document ‘Understanding the relevance and application of the Access to Natural Green Space Standard’ Natural England 2008. This updates information about the promotion and delivery of accessible nature green space. The English Nature report 153 is from the 1990s.
- 34 Part 3c – As noted in relation to our comments on Policy FUL/04, developers can only be asked to mitigate for losses outside their site (i.e. in the Parish) through a Section 106 Planning Obligation and where the Government rules can be met. They must be:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- 35 It should be noted that it will be possible to deliver Biodiversity Net Gain offsite **outside** the parish boundary if it contributes to strategic ecological networks or

the Nature Recovery Network (yet to be drafted as an outcome of the Environment Act). Guidance on this is currently being drafted.

- 36 Part 3d - How would this criterion be achieved? Who would be able to test that the drainage patterns would not be compromised? How would a developer demonstrate this? Suggest it should state that proposals should be supported by supporting evidence that demonstrates that the existing drainage patterns will not be compromised. The supporting text could set out the parameters for what should be submitted.
- 37 Part 4 – It is unclear who would be responsible for monitoring the legal agreements to achieve this part of the policy. These can only be associated with a planning consent and therefore the policy should state "appropriate legal agreements associated with a planning consent."

## **8 Local Green Spaces and Amenity Areas**

### **Policy FUL/05 Local Green Spaces and Protected Village Amenity Areas**

- 38 We welcome that the wording has been amended to this policy since Regulation 14. We do not consider it is necessary to include the second sentences within part 1 and part 2 of the policy as this is repeating the relevant Local Plan policies.
- 39 Part 1 – In the first sentence delete the unnecessary 'a' after designated as.
- 40 We welcome the unique references for each LGS and PVAA and note that additional sites have been added to the policy some of which were suggestions by us in our response to the Regulation 14 consultation.
- 41 New LGSs have been added at Fulbourn Hospital Parkland and Fulbourn Hospital Old Cemetery - The parish council has recently notified the landowners of these proposed designations. We have concerns that the extent of these LGSs is more that the 'important green space' shown in the adopted [Fulbourn and Fulbourn Hospital Conservation Appraisal 2021](#) ( See page 27) Also, the Fulbourn hospital site has a development brief that includes some sites for development within the areas proposed as LGS. We have concerns therefore at the proposed boundaries and how these might impact the development of these sites.  
<https://scams.moderngov.co.uk/documents/s73905/Development%20Brief.pdf>

## **9 Village Character**

### **Policy FUL/06 – Protecting and Enhancing Village Character.**

- 42 For planning officers dealing with planning applications, it could be confusing if similar criteria are used in different policies and not clearly stated once in one policy. For example, criteria c in this policy about trees and hedgerows is already referred to in part in 1d of Policy FUL/04. There is no need to repeat

policy requirements in separate policies as the Plan will be read as a whole and as appropriate to an application.

- 43 Part 2a – This criterion cross refers to Policy FUL/07 but we are unsure why this is required as these issues are not specifically mentioned in this policy?
- 44 Parts 2c – This appears to be repeating the requirements in Part 1d +1e of Policy FUL/04 regarding trees?
- 45 Part 2d – This criterion previously had ‘diverse’ built frontages which has now been replaced by ‘fragmented’. We still have concerns about how such terms could be interpreted. Is it clear what the policy is asking for and it might be better if these areas of fragmented frontage were perhaps defined on a map?
- 46 Part 3 – We remain concerned about an unduly heavy emphasis on contemporary design in policies FUL06 and FUL/07. Neither ‘contemporary’, used in FUL/07, nor ‘creative and contemporary’ used in FUL/06, is defined in the Glossary, and it is not clear whether the term ‘contemporary’ means ‘in the modernist tradition’, or ‘in vogue at the time of the present neighbourhood plan’, or ‘eschewing emulation of previous architectural styles’, or something else. There are many places in the village, including within the conservation areas and the vicinity of listed buildings, where modernist buildings or extensions, or innovative development beyond that tradition might be very appropriate and enhance the historic environment, but there are other places where this approach would not be the most appropriate, and some designs styled ‘contemporary’ would be harmful to the setting of some of the listed buildings and the overall character of the area.
- 47 The wide variety of architectural styles in the village is acknowledged and we agree that Fulbourn’s character will be preserved and enhanced by continuing variety of building styles, including innovative development and that in the modernist tradition. However, foregrounding ‘contemporary’ design as Policy FUL/06 does and requiring a ‘contemporary’ approach to be considered in extensions, as Policy FUL/07 does, is unduly prescriptive, and could lead to planning decisions which are harmful to the setting of listed buildings or the character of the conservation area. We question whether this level of prescription in design is consistent with local plan policy or national planning guidance.
- 48 It is suggested that part 3 of the policy should explicitly state that those instances when a contemporary response is not appropriate i.e., “...and where this would negatively impact on designated and non-designated heritage assets”.
- 49 Part 4 of policy - A section has been added to this policy to include a reference to buildings identified as non-designated heritage assets (NDHA) in the Fulbourn CAA. These NDHAs have not been shown on a map or listed within the Plan which we consider is a missed opportunity to add weight to their protections and future enhancement. (See maps on pages 5-7 of the [CAA](#) and Chapter 9 with the NDHA listed on pages 36-37 of the CAA).

### **Policy FUL/07 Building and Landscape Design**

- 50 This policy has been revised since the Regulation 14 consultation. It is welcomed that it more clearly laid out now for future users of the Plan.
- 51 Part 1 –The Village Design Guide is referred to in this section. Reference to any documents that supersede it would help maintain longevity of the policy, as is the case in other policies - i.e.: “Village Design Guide and any documents that supersede this”.
- 52 Part 2a Height - This section refers to buildings of 2.5 storeys and 2 storeys having a similar height. In most instances, this is not the case as there will be some height differential between a 2 storey and a 2.5 storey building.
- 53 Part 2b Density – Does this section simply repeat the Local Plan policy – Policy H/8: Housing Density? What is unique to Fulbourn other than mentioning other policies within the Plan? The wording about density allows for a flexible designed approach for densities above 30 dph. It should be noted that existing outline consents at the Ida Darwin and land east of Teversham Road sites have some areas with housing densities above 30 dph.
- 54 Part 2c Built form - This could be made clear to recognise that the character of the village is made up of different materials, colours, and styles and the design response should relate to those materials, colours and styles found in Fulbourn. Perhaps the reference to different materials relates to them being used in a single building? This should be clarified.
- 55 There are two sections within this policy numbered 2. This will need amending.
- 56 Part 3a-d – Do the criteria in this section add anything locally specific for Fulbourn or is it simply repeating Policy HQ/1 Design Principles from the Local Plan and the Design Guide SPD?
- 57 Part 4d –We do not consider that this criterion adds anything to the policy and should be removed. All development must take account of relevant policies in the Development Plan.

### **Policy FUL/08 – Village Street and Lane Layout**

- 58 Part 2d – Planning policy does not have control of signage – this would be a highway matter.

## **10 Residential development**

- 59 Paragraphs 10.2 -10.3 - The introduction to this chapter has been much rewritten. Mention is made of the emerging Greater Cambridge Local Plan and the options considered in the making of the local plan. Whilst this Plan must be aware of the emerging local plan, we do not consider it appropriate to include this within the supporting text as it is likely to need to be updated as the

emerging local plan moves towards its next formal stage. Until the local plan is examined it is not certain what strategy will be included in it.

- 60 Paragraph 10.7 for clarity it should be stated that it was Cambridgeshire ACRE that carried out the survey not Cambridge.
- 61 The Ida Darwin and Teversham Road Sites – In the Regulation 14 version of the Plan there was a policy for these two sites. We commented that it was not necessary to repeat Local Plan policies H/3 and SS/3 and only additional criteria should be included in the Plan. The option has been taken to no longer retain a policy in the Plan but policy like language is used in paragraph 10.11 – 10.12 for these two sites. It should be noted that this wording has no weight in the determination of applications. The [Village Design Guide](#) does provide detailed design guidance relating to these sites which could have been included in a policy in the Plan to add weight.(See page 16)

### **Policy FUL/09: Larger Residential Development (10 or more units)**

- 62 Part 1a – This criterion requires an appropriate housing mix. There is no evidence in the supporting text to set out what may be appropriate in Fulbourn to meet local needs. It remains unclear why at least 5% in the housing mix should be built to be accessible and adaptable dwellings M4(2) standard. This has not been justified. There is no information in the supporting text other than mention that the local residents think the needs of an ageing population should be considered. As this is for housing schemes of 10 or more units in order to achieve 5% of anything the scheme would have to be much more than 10 – (a development of 50 units to get 2.5 homes). How is this different from Policy H/9 in the Local Plan except it is requiring at least 5% but without clear justification.
- 63 Part 1b – We consider that this criterion simply repeats the Local Plan policy on affordable home (Policy H/10).
- 64 Part 2a - There is no information in the supporting text about a Building for a Healthy Life (BHL) assessment and where a developer could find out how to carry such an assessment out. Any appraisal system should be agreed with the local planning authority as the decision-making body.
- 65 We consider that the use of BHL toolkit should be used with caution as it does not provide absolute results on design quality. It is useful as an engagement tool or for discussion to agree on what the development should aim to achieve. It uses a traffic light system for 12 questions with the aim to score greens, reduce ambers and avoid reds. As the tool is for all development it is very difficult to differentiate in the document different responses to village/rural areas as compared to urban and could conflict with the objectives of neighbourhood plan. A reference to the VDG SPD would be more appropriate.
- 66 Part 2b – Written Ministerial Statement HCWS488 by the Secretary of State for Communities and Local Government dated 25 March 2015 states that “neighbourhood plans should not set ..... any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.” It is not clear what this adds to the policies in

the Local Plan about renewable energy - Policy CC/3 Renewable and Low Carbon Energy in New Developments. We adopted a new SPD in 2020 which we had suggested could be cross referenced in the supporting text about renewables - [Greater Cambridge Design and Construction Supplementary Planning Document](#)

- 67 Part 3a. – This appears to be a new criterion included in the Plan as previously there had not been mention of degradation of the natural wetland ecosystem. Would this criterion be better place in Policy FUL/04?
- 68 Part 3b – This criterion repeats the policy included in the Local Plan – Policy CC/8: Sustainable Drainage Systems.
- 69 Part 3c – Does this criterion add any value as other policies within the Plan cover this issue – FUL/01; FUL/04.
- 70 Part 3d – This is repeating an existing policy in the Plan – FUL/03
- 71 Part 3e – This is repeating Policy FUL/01
- 72 Part 4 of the policy – We repeat the comments we made at Regulation 14 that developers can only be asked to contribute outside their site (i.e., in the Parish) through a Section 106 Planning Obligation and where the Government rules can be met. As noted in our comments above, they must be:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- A developer could not be required to contribute to strengthen existing facilities for the village as a whole.
- 73 We remain unsure what is meant by ‘to support community integration in response to the requirements set out by Fulbourn Parish Council’ given that other statutory service providers will determine how their services are delivered. It is unclear whether this requirement is set out in the Plan and supported by evidence for such requirements There is a list on page 110 in the Delivery Priorities chapter of the Plan. How would a development know what is required or a planning officer know when it has been met? It is suggested that “in response to the requirements set out by Fulbourn Parish Council” is deleted from the policy.

#### **Policy FUL/10 Rural Exception Sites**

- 74 Adopted Local Plan Policy H/11 already provides an up-to-date policy for the delivery of such schemes. We do not think that these criteria could be implemented without full justification.
- 75 Part 1d – This repeat what is already in Policy FUL/01 and FUL/04.
- 76 Part 2 – There would need to be clear justification of why this criterion should remain. The NPPF is clear that such exceptions should be allowed to ensure a housing scheme is viable. (NPPF 2021 paragraph 78). The Local Plan policy

also is clear that allowing some market housing on rural exception sites on viability or deliverability grounds is acceptable. Our housing team has commented that on deliverability grounds it may be that a landowner may not release the land for affordable housing unless they are allowed market housing on the site.

### **Policy FUL/11 -Housing Design Quality**

- 77 The supporting text to this policy would have benefited from having more justification for all of the criteria included. They cover a range of different design considerations and would impact on the viability of any scheme.
- 78 Part 1b; 1f; 1h; 1i - These appear to be new criterion included in the Plan since the Regulation 14 consultation.
- 79 The inclusion of criteria that support sustainable construction – 1a, 1b and 1c is supported.
- 80 Part 1g - We are unsure as to how this adds value to the existing Local Plan car parking policy which has a design-led approach? Policy TI/3: Parking Provision.

## **11 Employment**

### **Policy FUL/12 – Employment Development**

- 81 Part 1 – The first part of this section is simply repeating the Local Plan Policy E/12.
- 82 Part 1a - Should this be cross referring to FUL/16? This is stating that all development no matter the scale will have to clearly show its commitment. It is not clear how an applicant would demonstrate this and how a planning officer would know that it could be achieved? The policy is not explaining how to measure this clearly, for example through the submission of a Transport Assessment?
- 83 Part 1b - The requirement that there should be no increase in heavy goods vehicle movement is unreasonable given that developments outside the Neighbourhood Area could result in additional movements. Transport assessments should perhaps be used to demonstrate that the transport impact is acceptable.
- 84 Part 1c – Whilst recognising that heavy vehicles may impact the smaller roads within the parish is it realistic to expect new development to mitigate any adverse impacts associated with vans too. Surely this would restrict the types of employment that would be acceptable within the parish. There perhaps needs to be a definition of ‘heavy vehicle’ in the glossary and the supporting text.
- 85 Part 1d – Is it realistic to require no loss of character and visual amenity from an employment development with some level of car parking and transportation?

Any new development is likely to require some car parking for workers and visitors and therefore will generate some traffic, so it is unreasonable to expect no increase in traffic movement because of new development?

- 86 Part 2a - This criterion does not define what is meant by heavy vehicles – it could be difficult for a development management officer to interpret what is meant by this term when determining an application for employment in the parish. Who would define what is meant by requiring regular heavy vehicles – once a week? one a day? What is regular? It is also open to interpretation what is meant by the ‘village boundary’ and ‘direct access to the road network’.
- 87 Part 2b - How would such a policy be achieved as banning heavy lorries from any streets is outside of the role of a planning policy.
- 88 Part 2c – How would you define adequate planted edges? How would a planning officer considering a planning application be able to determine if planting is adequate? How does it differ from other landscape policies in the Plan? FUL /01 part 1 or FUL/04 –parts 2a and 2b?

### **Policy FUL/13 Large Employment Sites**

- 89 We would recommend that an inset map is included showing the employment sites mentioned in this policy. It is relying on local knowledge for their location otherwise.
- 90 Part 2 - The policy is more stringent than Local Plan Policy TI/2 which effectively requires a Transport Assessment and Travel Plan for all development on the two employment sites referred to. The requirements are potentially overly onerous -for example where development is small scale the addition of a new entrance area or a new plant area would be required to provide this.
- 91 Part 1 - The Plan does not need to mention that employment development should comply with relevant policies in the Local Plan.
- 92 Part 2 –What is ‘accepted best practice’? Who would know what this was ‘at the time of an application’? Explanations for this is not included in the supporting text.
- 93 The policy mentions clear responsibilities for monitoring but by whom? It might be more appropriate to state that approvals will be conditioned to require the implementation and monitoring of travel plans.

## **12 Community Facilities**

### **Policy FUL/14 –Community Facilities**

- 94 Part 1 – This policy is simply repeating the Local Plan policy that protects village services and facilities and this does not need to be repeated in the Plan (Policy SC/3)

- 95 Part 2 – It is not necessary to include the wording after (see Figure 19) relating to standards required by Sport England.
- 96 The landowner of this field has been consulted over this proposal but does not indicate whether he/she is happy for the recreation ground to expand into this area? If the landowner is not willing for this to take place it may make this policy aspiration unviable/ unachievable.
- 97 Part 3 – This criterion seeks to direct the District Council to secure funding for existing facilities in preference to the creation on new ones. It is accepted that using section 106 contributions to extend existing facilities will, in many cases, be the most logical and cost-effective way to mitigate the impact of a development. However, there are times when a new standalone community facility is required, and the decision will always rest with the planning decision taker having regard to the specific circumstances of the proposal.

### **Policy FUL/15 –Healthcare Facilities**

- 98 It has not been clearly stated in the Plan whether the current GP practice and / or the Local Heath authority are supportive of the proposals in this policy. Within the consultation statement there is an indication that there have been discussions with the GP practice and that they support the proposals. In part 3 of this policy it states that there is an expectation that the new healthcare will be with the current GP practice.

### **15 Delivery Priorities**

- 99 Through preparation of the Neighbourhood Plan a number of spending priorities have been identified by the community to improve the lives of people living and working in the parish. Both the Local Plan and national planning guidance recognises that not all developments will be able to sustain all policy requirements expected of it. Where planning obligations are negotiated on the grounds of viability some infrastructure requirements need to be given a greater level of priority than others and in some cases contributions towards the lower priority items may ultimately not be secured. This Delivery Priorities list is therefore a helpful guide to the District Council when considering viability as part of the decision-making process.

### **Appendix 2 - Trees**

- 100 A new appendix has been added to the Plan including a list of native, specimen and ornamental trees which are considered appropriate for Fulbourn. It is not clear who decided upon the trees to be included in this list? Our Trees officer has no issues with the species choice but would not recommend limiting new tree planting to only species in the list. We have concerns that disease can decimate an entire population of trees as has happened with Horse chestnut, Elm, Ash and to some extent Oak. More important is seeking trees which benefit ecology, are resilient in the face of climate change and are not invasive

or cause harm. This appendix may need updating regularly to reflect the changing climate.

- 101 If the list is to be retained, then all trees must include their botanical name to avoid confusion.

### **Appendix 3 – Glossary**

- 102 Biodiversity Net Gain is included in the glossary – the reference to the Environment Bill (2020) needs to be updated to the Environment Act 2021.