

Record count: 47

59374

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version

Respondent: Avison Young

Date received: 14/01/2022 via Email

Summary:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

Full text:

-

Change suggested by respondent:

-

Attachments: Response Form - <https://cambridge.oc2.uk/a/3v5sh>

Our Ref: MV/ 15B901605



14 January 2022

South Cambridgeshire District Council
neighbourhood.planning@greatercambridgeplanning.org
via email only

Dear Sir / Madam

**Fulbourn Neighbourhood Plan Regulation 16 Consultation
November 2021 – January 2022
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.



Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

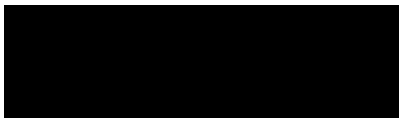
Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**



For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

59358

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridge Past, Present & Future**Date received:** 18/01/2022 via Web**Summary:**

CPPF, Cambridge's largest civic society, is a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.

CPPF support the Neighbourhood Plan, particularly

- Objective 1 retaining Fulbourn as an individual village, separate from Cambridge. The Green Belt is a crucial policy designation to achieve this and inappropriate development in the Green Belt must be resisted.
- Policy FUL/03 requesting developments to contributing to the Green Infrastructure Network.

Full text:

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- Objective 1 retaining Fulbourn as an individual village, separate from Cambridge. The Green Belt is a crucial policy designation to achieve this and inappropriate development in the Green Belt must be resisted.
- Policy FUL/03 requesting developments to contributing to the Green Infrastructure Network.

Change suggested by respondent:

-

Attachments: None

59331

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridgeshire and Peterborough Clinical Commissioning Group**Date received:** 18/11/2021 via Email**Summary:**

Healthcare Centre - Paragraph 12.7 -12.8

It was encouraging to note the consideration of future healthcare within the village and look forward to receiving further details in due course.

Full text:

Thank you for sharing the link to the Fulbourn Neighbourhood Plan.

It was encouraging to note the consideration of future healthcare within the village and look forward to receiving further details in due course.

Healthcare Centre

12.7 Retaining and improving healthcare facilities within the village is a key priority. This was already one of the objectives of the Village Plan in 2009 and not enough progress has been made since then. A survey and report by the current medical practice has found that:

- The Fulbourn Health Centre is no longer fit for purpose. It is too small to meet the health needs of an ageing and growing village population and it would be inadequate to meet the needs of the increased population (around 20% more by 2031). It also serves some of the villagers from Teversham, Great Wilbraham and Little Wilbraham.
- The building occupies a large site, ideally located in the heart of the village and close to a bus stop. Redevelopment or extension on the current site could be an option.
- Healthcare provision is changing, shifting towards integrated services, social care and life-style support: a new building will be necessary to create an integrated centre enabling staff and services to work in a joined-up way, with improved connections between Primary Care, Mental Health and Social Services, and allowing the teaching of medical staff on site.

12.8 The community supports the retention, and where possible, expansion of the Health Centre at its current locations. The establishment of a new multi-functional facility with increased capacity for consulting and treatment rooms, an on-site pharmacy, other medical and social services and voluntary sector occupiers will be encouraged. Enabling residential development will also be favourably considered, if appropriate to the capacity of the site and character and amenity of the area.

- A multi-purpose Health Centre should be located at the heart of the village, to be easily accessible and to enable joined-up services, either at its current location or in an alternative site providing the same level of accessibility and the possibility of integrated services.”

Change suggested by respondent:

-

Attachments: None

59370

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridgeshire and Peterborough NHS Foundation Trust**Agent:** Savills**Date received:** 18/01/2022 via Web**Summary:**

There is no merit, benefit or justification for defining a Local Green Space at "Fulbourn Hospital Parkland" as put forward with in Policy FUL/05 having regard to the existence of current policy designations such as the Green Belt and Conservation Area

Full text:

Representations on behalf of Cambridgeshire & Peterborough NHS Foundation Trust to submitted draft Fulbourn Neighbourhood Plan

Cambridgeshire & Peterborough NHS Foundation Trust are the freehold landowners of land at Fulbourn Hospital. This is the site currently occupied by a number of healthcare services and located to the west of Capital Park (referred to as the "former Fulbourn Hospital site") within the Neighbourhood Plan)

Whilst supporting the publication of a draft Neighbourhood Plan, the Trust is needing to ensure that the policies and proposals within the document do not, as far as reasonably possible, hinder the delivery of vitally important healthcare services. The Trust at its heart must prioritise healthcare provision, an aspiration and objective brought more sharply into focus during the global pandemic.

Fulbourn Policy FUL/05 – Local Green Space and Protected Village Amenity Areas

This policy seeks to identify Local Green Spaces within the Neighbourhood Plan Area. From the outset the Neighbourhood Plan acknowledges at Paragraph 8.1 that Local Green Space are intended to be protected from inappropriate development as intended by the policies protecting Green Belts. There is clearly a duplication in the instance where Green Belt designation applies and when the Neighbourhood Plan also seeks to identify land within the Green Belt as a Local Green Space. The definition of Green Belt and the reasoning for including land within it is already set out within national planning policy guidance and in the development plan as is the protection of those areas from inappropriate development.

We cannot see any justification for including Local Green Space designations within the existing Green Belt and in such a context , the Trust cannot support the identification of the "Fulbourn Hospital Parkland" in paragraph 1c of Policy FUL/05

The Trust has made representations to the emerging Greater Cambridge Local Plan to seek amendment to the Green Belt boundary to exclude a significant area of the Fulbourn Hospital site to be removed from the Green Belt on the basis of the significance of a large built footprint and the impact that this has and the justification for including the land within the Green Belt designation. (see enclosed) The Trust is also cognisant of the open parkland to the south of the site but at the same time is respectfully seeking clarity from the various authorities that in the circumstances where some development which need to take place which may encroach on part of this parkland area that further policy designations are not put in place to jeopardise the provision of appropriate healthcare services on this important campus.

The imposition of further policy designations on an area which has already been the focus of vitally important healthcare services will be resisted by the Trust whilst acknowledging the perceived importance of the hospital site by some in terms of the open land to the front of the site.

Clearly there is a subjective element of defining what area constitutes parkland and what does not. This is relevant to the situation at the Fulbourn Hospital site where the now demolished Kent House (demolished in 2008) covered a substantial land area to the west of Burnett House.

We note that the NPPF 2021 refers to Local Green Space (paras 102-103) . In such a context paragraph 103 states "Policies for managing development within a Local Green Space should be consistent with those for Green Belts." We do see merit in identifying Local Green Spaces on land which is already Green Belt. We do not understand what benefits this would provide to the community on top of the Green Belt policy which already covers this parkland area as well as inclusion within the designated Conservation Area. From the Trust's perspective it simply adds another policy restriction onto a site which remains absolutely key to the provision of critical new healthcare services.

The Trust must be a in position to be able to deliver healthcare services on this site and imposing additional planning designations across the whole of the defined Local Green Space area simply threatens the delivery of very important services that this site offers to the wider community.

Change suggested by respondent:

There is no merit, benefit or justification for defining a Local Green Space at "Fulbourn Hospital Parkland" as put forward with in Policy FUL/05 having regard to the existence of current policy designations such as the Green Belt and Conservation Area .

We respectfully suggest that reference to a Local Green Space at Fulbourn Hospital Parkland be removed from Policy FUL/05 of the Neighbourhood Plan.

Attachments: Reps on behalf of CPHT to Greater Cambridge Local Plan - First Proposals.docx -
<https://cambridge.oc2.uk/a/3v5sb>
Suggested revision to Green Belt boundary.pdf - <https://cambridge.oc2.uk/a/3v5sc>

59369

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridgeshire and Peterborough NHS Foundation Trust**Agent:** Savills**Date received:** 18/01/2022 via Web**Summary:**

Delete paragraph 2 of Policy FUL /01 since it duplicates other policy designations having regard to the Neighbourhood Plan putting forward the concept of an Important Visual Gap. The Cambridge Green Belt as a designation already fulfills distinct purposes having regard to guidance with National Planning Policy Framework

Full text:

Representations on behalf of Cambridgeshire & Peterborough NHS Foundation Trust to the Submitted version of the Fulbourn Neighbourhood Plan

Policy FUL/01 - "Protecting the Distinctiveness and Landscape Setting of Fulbourn"

Cambridgeshire & Peterborough NHS Foundation Trust are the freehold landowners of land at Fulbourn Hospital. This is the site currently occupied by a number of healthcare services and located to the west of Capital Park (referred to as the "former Fulbourn Hospital site") within the Neighbourhood Plan)

Whilst supporting the publication of a draft Neighbourhood Plan, the Trust is needing to ensure that the policies and proposals within the document do not, as far as reasonably possible, hinder the delivery of vitally important healthcare services. The Trust at its heart must prioritise healthcare provision, an aspiration and objective brought more sharply into focus during the global pandemic.

Policy FUL/01 within the Draft Neighbourhood Plan relates to the setting of the village and its separation from the City. The policy contains six paragraphs of policy wording which seek to protect the distinctiveness and the landscape setting of the village.

The first paragraph is of a generic nature to protect and enhance the setting and special character of Fulbourn by ensuring that all development proposals should not have an adverse effect on the rural character and openness of the landscape setting. We would support such a statement having regard to planning policies which are positively written and which should not advocate poor or inappropriate development as a matter of course.

The second paragraph within the policy states that development will not be permitted which would encroach on or reduce the current dominant green aspect of the "Important Visual Gap between Fulbourn and the boundary of the urban area of Cambridge and neighbouring villages". The Neighbourhood Plan has introduced this new "Important Visual Gap" policy approach which would appear to be a strategic policy which duplicates a number of other policies within national or local context.

The area that is the subject of the Important Visual Gap is shown in Figure 8 of the Neighbourhood Plan and correlates with an area of land already designated as Green Belt whose purposes are set out within national planning policy guidance in the NPPF at paragraph 138.

Paragraph 138 of the NPPF states :

"Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

These Green Belt purposes in our view duplicate the Important Visual Gap proposal put forward in the Neighbourhood Plan and simply places another policy on top of an existing policy. Indeed, looking at the Important Visual Gap approach in more detail, it is directed to development which would "encroach on or reduce the current dominant green aspect of the Important Visual Gap" within that area. It suggests that development which would not encroach upon or reduce the green aspect would not be relevant in the context of this policy wording given this is the only reference to the Important Visual Gap in terms of policy wording.

In this context, the Trust has already made representations to the Greater Cambridge Local Plan Consultation documents to remove the current built up area of Fulbourn Hospital from the Green Belt on the basis of the nature and character of the built up form in that location does not fulfil Green Belt purposes. (see enclosed) This is similarly the case with the intention of including Fulbourn Hospital within an Important Visual Gap policy which already duplicates other policies. Accordingly, the Trust do not support Policy FUL/01 having regard to the duplicating nature of the policy and the layer of further policy designations within the area.

It is the case that under the current regime of planning policies within the development plan , the Trust must on every

occasion must make the case for Very Special Circumstances for building within the Green Belt. It is the Trust's view that land which falls in the northern part of the Fulbourn Hospital site is of a character that it is no longer fulfilling a Green Belt function given its built form including land that has the benefit of planning permission (eg. the new Resource Centre granted planning permission in April 2021 (20/02887/FUL). Indeed in the current climate of significant pressure upon healthcare services and their effective and efficient delivery, it is vital that such planning constraints do not jeopardise forward looking plans to consolidate such critical and important facilities on the Fulbourn Hospital site .

Turning to Paragraphs 4 and 5 within Policy FUL/01, the text lists a number of identified "Locally Important Views" in Figure 9 of the Plan and then states development will not be permitted where it would adversely affect the setting of those views or the loss of woodland and openness. In the cases where development could proceed within those viewpoints and where it would not affect the views or the woodland or open areas (notwithstanding any other policy designations) then proposals would presumably not be considered relevant in the context of this part of the Policy.

As stated above it is the Trust's view to establish a planning framework where it able to deliver new and improved healthcare services based around the existing built up area of the hospital. In the circumstances where such development would be consolidating the existing built form we would consider it would safeguard such viewpoints.

Change suggested by respondent:

Delete paragraph 2 of Policy FUL /01 since the reference to an Important Visual Gap designation duplicates other policy designations including the Green Belt. Reference to an Important Visual Gap policy and reference to it elsewhere in the document should be removed including Figure 8

Attachments: Reps on behalf of CPHT to Greater Cambridge Local Plan - First Proposals.docx - <https://cambridge.oc2.uk/a/3v5s9>
Suggested revision to Green Belt boundary.pdf - <https://cambridge.oc2.uk/a/3v5sv>

Representations to Greater Cambridge Local Plan – First Proposals

On behalf of Cambridgeshire & Peterborough NHS Foundation Trust

Policy S/RRA/H/3 “Fulbourn and Ida Darwin Hospitals”

Savills (UK) Ltd are instructed by Cambridgeshire & Peterborough NHS Foundation Trust to make the necessary and relevant representations to the Greater Cambridge Local Plan – First Proposals Document which has been published for consultation.

We appreciate that the consultation documents reflect the fact that we remain at the early stage of plan preparation and that the document only sets out the broad policy direction of the new Joint Local Plan but nevertheless remains important for the Trust to engage in the plan making process.

In such a context, the Trust acknowledges the need for a Local Plan review having regard to the need for both local planning authorities to cater for significant growth that is anticipated to come forward and the consequent impact that such growth will have upon public services, including healthcare. The inter-dependency between the urban area of Cambridge and the rural hinterland encompassing some 100 villages on major new strategic development sites is very clear and justifies the need for a new Joint Local Plan to come forward.

The Trust is a landowner to the east of Cambridge and includes that area known as the Fulbourn Hospital site. The Trust formerly owned the Ida Darwin Hospital site further to the east but this was sold in late 2019 to Homes England. The site was sold to Homes England with the benefit of an outline planning permission for new residential development and was then sold on to a housebuilder.

It is the case that the Trust continues to provide a hugely important mental healthcare service on the Fulbourn Hospital site and more recently secured planning permission on 30 April 2021 for a new Resource Centre on the site (planning application reference 20/02887/FUL). The granting of this permission acknowledged that the site lies within the designated Green Belt and within the designated Conservation Area since this was the planning policy framework position at the time of the determination of the planning application.

In addition to the policy designation, it was the case that Policy H3 “Fulbourn & Ida Darwin Hospitals” was relevant given this policy formed part of the Development Plan. This policy is set out below

“Policy H/3: Fulbourn and Ida Darwin Hospitals

1. The redevelopment of the existing built footprint of the Ida Darwin Hospital into a different configuration, comprising residential redevelopment on the eastern part of the Ida Darwin site and the transfer of part of the building footprint to the Fulbourn Hospital site for new mental health facilities will be permitted.

2. Redevelopment will create a green wedge on the western part of the Ida Darwin site to provide a compensatory enhancement to the openness of the Green Belt in this location. This green wedge will also provide enhanced public access to the countryside.

3. Developers will be required to undertake ecological surveys and monitoring prior to the commencement of construction, and propose a Biodiversity Strategy for the protection and enhancement of biodiversity that establishes which areas will be protected and enhanced, and appropriate mitigation measures.

4. *An investigation into land contamination will be required prior to the granting of any planning permission. Should this indicate that remediation should be undertaken, this must be done to a standard agreed with the Council and conditions will be imposed on any planning permission to ensure that development takes place in accordance with a programme which takes account of remediation work.*

5. *Appropriate investigation of noise and vibration in relation to the adjoining railway line will be required, and attenuation measures may be secured by condition as necessary.*

6. *Development Briefs for this sensitive location in the Green Belt between Cambridge and Fulbourn are required to be submitted to and approved by the Local Planning Authority prior to granting of planning permission."*

The Greater Cambridge Local Plan – First Proposals consultation document proposes that this policy be retained in a new Joint Local Plan (page 133 of the consultation document) The Trust cannot see a case why such a policy should be retained having regard to the following points:

1. There is no link between the Ida Darwin Hospital site (which was sold to Homes England and subsequently sold to a residential developer) and the Fulbourn Hospital site. The *"transfer of part of this building footprint to the Fulbourn Hospital site for new mental health facilities will be permitted"* is wording that has no relevance to a new Local Plan given that the site has been sold off following the grant of planning permission and at the time of writing is the subject of a detailed planning application for some 203 dwellings and community provision (application reference 20/05199/REM).
2. The broader issue of the importance of the Fulbourn Hospital site as a provider of critical healthcare services should not be constrained by unjustifiable planning policy restrictions which threaten the critical provision for important healthcare services. This is brought into even more acute awareness given the global pandemic and the importance of healthcare services in such a context.
3. The wording of the policy which requires developers to undertake ecological surveys and monitoring, investigate land contamination and assess noise and vibration are all matters that are either out of date and therefore irrelevant or at least can be satisfactorily addressed through other policies in the plan.

In the circumstances where the former hospital buildings at Ida Darwin have now been demolished and planning permission granted (see above), there is no correlation between the floorspace on the Ida Darwin site and any new floorspace at Fulbourn Hospital.

4. The final paragraph of Policy H/3 states that development briefs are required to be submitted and approved. It is the case that a development brief was prepared back in 2013 for the Ida Darwin hospital site but it is very clear that it is considerably out of date given that the document was prepared at a time when the Trust (as a landowner) had different aspirations for the Ida Darwin site. The brief was also prepared and supported a 2013 planning application for residential development on the Ida Darwin site which included a care home and which was ultimately refused at Committee. Thus, there is no case for a development brief needed for the Ida Darwin site and nor can we see a case for needing a new brief for the Fulbourn Hospital site although there may be the case for a masterplan to accompany any new application for development on the Fulbourn Hospital site.

Having regard to all the above points we cannot see any justification why Policy S/RRA/H/3 “Fulbourn and Ida Darwin Hospitals” would be carried forward into a new Local Plan.

Policy GP/GB “Protection and Enhancement of the Cambridge Green Belt”

One of the key policy directions within the new Joint Local Plan for Greater Cambridge is envisaged to be the retention of the Green Belt and the relevant policy justification that accompanies this designation. This follows on from references to Green Belt policy within National Planning Policy Guidance which sets out specific requirements for how planning proposals in these areas should be considered as well as providing the reasons why Green Belt designation applies to certain areas.

Paragraph 138 of the NPPF states:

“Green Belt serves five purposes:

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns;

and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

Paragraph 140 then states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or of updating of plans. Consequently, the preparation of a new joint Local Plan provides the opportunity to review such boundaries and in such circumstances is entirely appropriate for the Trust to respectfully suggest the need to amend the Green Belt boundary at Fulbourn Hospital on the basis of the contribution (or not) it makes to Green Belt purposes.

The Trust is the landowner of land at Fulbourn Hospital. The site is bounded to the west by Yarrow Road, by Cambridge Road to the south and by Tescos and Fulbourn Old Drift to the north. The Green Belt designation covers the whole of the site despite a significant amount of built form located in the northern part of the site and planning permission having been granted on 30 April 2021 for a new Resource Centre. This latter development was granted through a demonstration of Very Special Circumstances having regard to the presence of the Green Belt designation and its inclusion as part of the Development Plan.

It is the view of the Trust that legitimate questions should be asked about the appropriateness of including the Fulbourn Hospital site within the Green Belt given the significant amount of built form in the northern part of the site and the consequent character of the site in question. It is also relevant to refer to the commentary contained within the evidence base prepared in support of the initial work on the Local Plan. Topic Paper 5 is the Greater Cambridge Green Belt Assessment report and Appendix B to that document specifically relates to Site CH15 which is the land parcel including Tescos, Fulbourn Hospital and Capital Park immediately east of the hospital site. It is the view of the Trust that the largely built up nature of certainly the northern part of CH15 is such that it merits removal from the Green Belt.

Site CH15 is shown below as an extract from Appendix B to the Green Belt Assessment (Appendix B – Cambridge – Arbury to Cambridge North”)



Indeed the Green Belt assessment for Site CH15 above states:

“While the southern area of the parcel is more open, the parcel contains more significant urbanising elements including Fulbourn Hospital, Capital Park and a Tesco’s superstore”. The whole of land parcels CH15 lies adjacent to the existing built up area and it is acknowledged that the presence of a tree line and the edge of the built up area along Yarrow Road means that the views are dominated by urban development which is certainly not a characteristic in our view having regard to Green Belt designation.

Having regard to the three purposes of including land within the Green Belt, we make comment on each of these three purposes in italics below:

Cambridge Purpose 1 - To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre

The Green Belt assessment acknowledges that the contribution is limited. It states that the parcel has some relationship with the urban area and we would certainly confirm that is the case since it lies adjacent to the built up area. The assessment concludes that the parcel makes a “relatively limited contribution to Cambridge Purpose1”

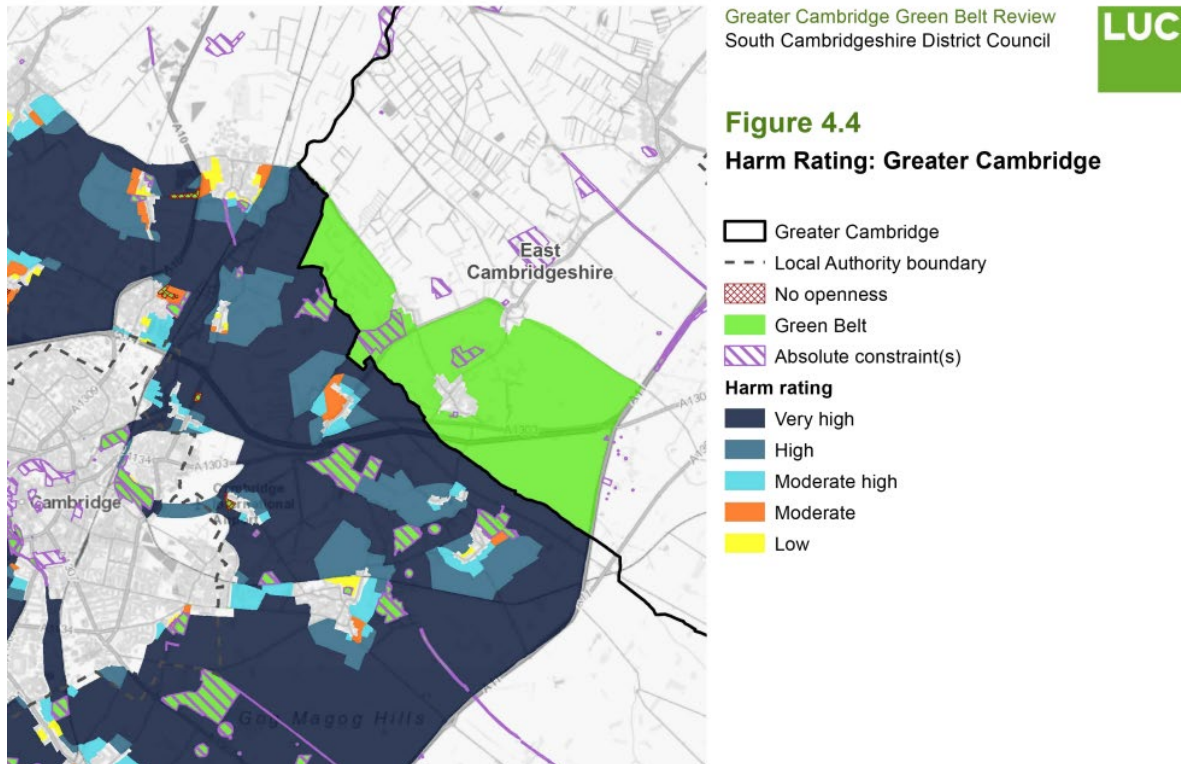
Cambridge Purpose 2– to maintain and enhance the quality of Cambridge’s setting.

It is certainly the case that Fulbourn Hospital, Tescos and Capital Park weaken the rural character of this edge of the City and whilst it is acknowledged that the land falls within Fulbourn Conservation Area this do not relate to land being included within the Green Belt nor the justification for it. Whilst it is the case that the southern parts of the land parcel have more open elements, it is the built up areas to the north and that character which dilutes the importance of including the land within the Green Belt. It cannot be the case that the built up area contributes positively to the character and the landscape and setting and thus there is no case for built up areas such as those being included within Green Belt designation.

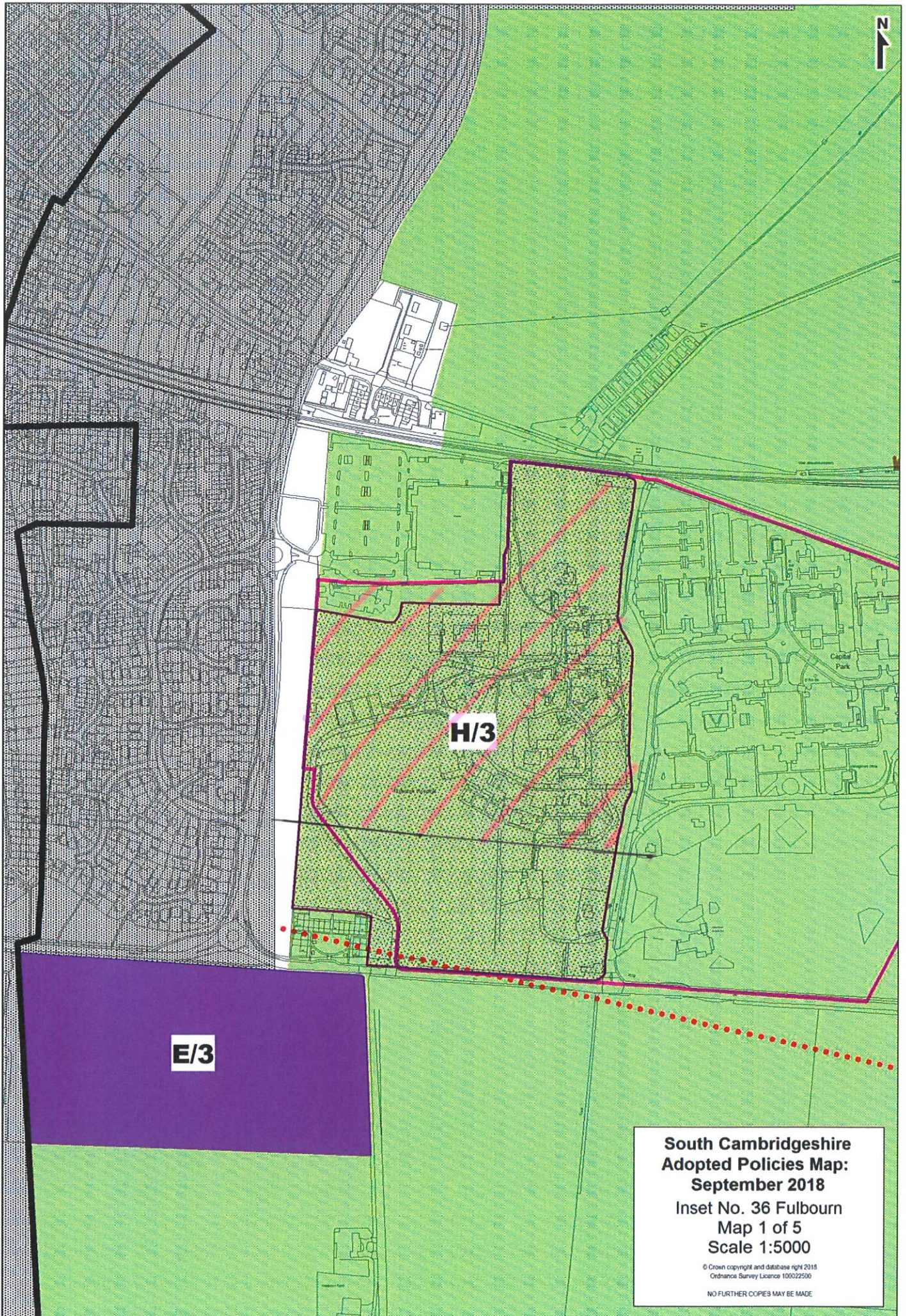
Cambridge Purpose 3– to prevent communities in the environs of Cambridge from merging into one another and with the City.

It is the case that the Green Belt assessment confirms that the contribution in this context is “relatively limited” because the land forms an area between Cherry Hinton and the village of Fulbourn where an urbanising development reduces any perceived separation.

It is clear that the Council’s technical assessment work which has looked at the contribution that Parcel CH15 makes to the Green Belt has led to a conclusion which places the land parcel CH15 in the “Moderate High” harm rating as shown in Figure 4.4 below. It is our view that that the character of the land parcel is such that it cannot be classed as a single site since there are clear differences between the more open southern areas at Cambridge Road and the far more built up areas to the north. It is considered that the built up areas to the north of the land parcel including the footprint of the buildings at Fulbourn Hospital should be removed from the Green Belt



The enclosed plan (taken from the Adopted Local Plan 2018) shows the suggested revision to the Green Belt boundary at it affects the Fulbourn Hospital site.



**South Cambridgeshire
Adopted Policies Map:
September 2018**
Inset No. 36 Fulbourn
Map 1 of 5
Scale 1:5000

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59329

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridgeshire Constabulary**Date received:** 09/11/2021 via Email**Summary:**

National Planning Policy Framework (NPPF) - Section 12 Paragraph 130(f) which states: -

Planning policies and decisions should ensure that developments:

create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

In relation to the design and layout of new developments including homes, commercial space, schools, hospitals and sheltered accommodation we make the following comment:

Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. It should incorporate the principles of 'Secured by Design' and demonstrate how the development proposals address the following issues, in order to design out and reduce the incidence and fear of crime:

- Physical protection: Places that include necessary, well-designed security features.
- Access and movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Safe routes: Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users.
- Structure: Places that are structured so that different uses do not cause conflict.
- Lighting: Ensuring appropriate and non-obtrusive lighting levels are achieved.
- Private space: Creating a clear separation between public and private spaces, avoiding public routes next to back gardens.
- Surveillance: Places where all publicly accessible spaces are overlooked.
- Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community.
- Activity: Places where the level of human activity is appropriate to the location reduces the risk of crime and creates a sense of safety at all times.
- Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

In practice this means that Secured by Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.

Full text:

Thank you for the opportunity to comment on the Fulbourn Neighbourhood plan.

In regards to Policy we would wish to mention:

National Planning Policy Framework (NPPF) - Section 12 Paragraph 130(f) which states: -

Planning policies and decisions should ensure that developments:

'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

In relation to the design and layout of new developments including homes, commercial space, schools, hospitals and sheltered accommodation we make the following comment:

Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. It should incorporate the principles of 'Secured by Design' and demonstrate how the development proposals address the following issues, in order to design out and reduce the incidence and fear of crime:

- Physical protection: Places that include necessary, well-designed security features.
- Access and movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Safe routes: Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users.
- Structure: Places that are structured so that different uses do not cause conflict.
- Lighting: Ensuring appropriate and non-obtrusive lighting levels are achieved.
- Private space: Creating a clear separation between public and private spaces, avoiding public routes next to back gardens.

- Surveillance: Places where all publicly accessible spaces are overlooked.
- Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community.
- Activity: Places where the level of human activity is appropriate to the location reduces the risk of crime and creates a sense of safety at all times.
- Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

In practice this means that Secured by Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.

Change suggested by respondent:

-

Attachments: None

59377

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Cambridgeshire County Council**Date received:** 18/01/2022 via Email**Summary:**

I have had a look through the revisions made under the Regulation 16 and it may be that it has been decided not to include the recommendations, however I have reiterated the points raised below:

- Reference to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD), which I have linked below for ease of reference, should be made regarding the principle of designing surface water drainage into a development. This document is adopted by South Cambridgeshire District Council
- SCDC Local Plan policy CC/7 is particularly important for protecting existing watercourses and groundwater bodies from pollution. It would be beneficial to include reference to this within the Neighbourhood Plan
- It would be worth drawing attention to Chapter 14 of the NPPF, as this relates to flood risk. For example paragraph 160(b) aims for development to be safe for the lifetime without increasing flood risk and where possible reducing flood risk overall
- With reference to the flood risk around Fulbourn, it is noted that this is made up mainly of surface water flood risk. There is some useful information on the gov.uk website on surface water flood risk, as well as in the South Cambridgeshire Strategic Flood Risk Assessment
- It would be good to include some policy directly related to the flood risk, drawn together from the policy within SCDC Local Plan, but relating to the risk around Fulbourn, particularly around water quality and quantity, to protect the chalk streams, and to ensure development does not increase flood risk within the village.

Full text:

I responded to the previous consultation on the Regulation 14 in March 2021. The plan itself still has a lot of positives in terms of surface water management, referencing the SCDC Local Plan, policies CC/8 and CC/9 and protecting the local watercourse networks.

I have had a look through the revisions made under the Regulation 16 and it may be that it has been decided not to include the recommendations, however I have reiterated the points raised below:

- Reference to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD), which I have linked below for ease of reference, should be made regarding the principle of designing surface water drainage into a development. This document is adopted by South Cambridgeshire District Council
- SCDC Local Plan policy CC/7 is particularly important for protecting existing watercourses and groundwater bodies from pollution. It would be beneficial to include reference to this within the Neighbourhood Plan
- It would be worth drawing attention to Chapter 14 of the NPPF, as this relates to flood risk. For example paragraph 160(b) aims for development to be safe for the lifetime without increasing flood risk and where possible reducing flood risk overall
- With reference to the flood risk around Fulbourn, it is noted that this is made up mainly of surface water flood risk. There is some useful information on the gov.uk website on surface water flood risk, as well as in the South Cambridgeshire Strategic Flood Risk Assessment
- It would be good to include some policy directly related to the flood risk, drawn together from the policy within SCDC Local Plan, but relating to the risk around Fulbourn, particularly around water quality and quantity, to protect the chalk streams, and to ensure development does not increase flood risk within the village.

Surface water and sustainable drainage systems (SuDS) planning webpage:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/surface-water-and-sustainable-drainage-systems-suds-planning>

Cambridgeshire Flood and Water SPD: https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Cambridgeshire_Flood_and_Water_Supplementary_Planning_Document.pdf

Surface Water Drainage Guidance for Developers: <https://www.cambridgeshire.gov.uk/asset-library/imported-assets/SWGFDFINALFINAL%20-%20November%202019.pdf>

Surface water flood maps: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

South Cambridgeshire Strategic Flood Risk Assessment: <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/the-adopted-development-plan/stages-in-the-preparation-of-the-local-plan-2018/strategic-flood-risk-assessment-september-2010/>

Happy to discuss anything of the above should you have any queries.

Change suggested by respondent:

■ -

Attachments: None

59372

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version

Respondent: Castlefield International Limited

Agent: Barton Willmore

Date received: 17/01/2022 via Email

Summary:

Policy FUL/01 Protecting the distinctiveness and landscape setting of Fulbourn.

The key outward viewpoint conflicts with the approved parameters plan of approved outline application S/0202/17/OL - (Castlefield has land interests at Teversham Road, Fulbourn)

Full text:

-

Change suggested by respondent:

-

Attachments: 25542.NPReps.17.1.22_Redacted.pdf - <https://cambridge.oc2.uk/a/3v5sw>
Response Form - <https://cambridge.oc2.uk/a/3v5sk>

Fulbourn Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713000 or neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 18 January 2022.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scambs.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Fulbourn Neighbourhood Plan.

Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Fulbourn Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	Agent's name: Paul Derry
Name of organisation: Castlefield International Ltd (if applicable)	Name of Agent's organisation: Barton Willmore (if applicable)
Address: c/o agent	Agent's Address: St Andrews House St Andrews Road Cambridge
Postcode:	Postcode: CB4 1WB
Email:	Email:
Telephone:	Telephone:
Signature:	Date: 17 January 2022

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

What part of the Neighbourhood Plan do you have comments on?	
Policy or Paragraph Number (please state)	FUL/01
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input type="checkbox"/> Comment
Reason for Support, Object or Comment: Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph If you consider that the referendum boundary should be extended, please outline your reasons.	
See Covering Letter	
Summary of Comments: If your comments are longer than 100 words, please summarise the main issues raised.	
The Key Outward Viewpoint conflicts with the approved parameters plan of approved outline application S/0202/17/OL - see covering letter	

Completed forms must be received by 5pm on 18 January 2022 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

Fulbourn Neighbourhood Plan Response
South Cambridgeshire District Council

By Email

Our Ref: 25542/A3/PD/
17 January 2022

Dear Sir/Madam

FULBOURN NEIGHBOURHOOD PLAN RESPONSE

These representations have been prepared by Barton Willmore LLP on behalf of Castlefield International Ltd (Castlefield) in respect of the Regulation 16 consultation on the Fulbourn Neighbourhood Plan, which has been submitted to South Cambridgeshire District Council for assessment.

Castlefield has land interests at Teversham Road, Fulbourn, which is directly referenced within paragraphs 10.10 and 10.11 of the draft Neighbourhood Plan. The boundary of the site is shown in the plan below:



Castlefield provided representations to the Regulation 14 consultation in their letter dated 26 February 2021, which should be available to the Council/independent examiner. The purpose of this representation is to reiterate the point previously made regarding the site. Outline consent was granted on the site through application S/0202/17/OL. Amongst the approved plans is a parameters plan which shows three distinct development parcels where built-form was considered acceptable. The boundaries of these parcels were informed by landscape, heritage and drainage studies, and the conclusion from the outline therefore is that development on these parcels would be acceptable in principle.

It is noted that Key Outward Viewpoint From Village C6 looks across the site northwards, when viewed from Poorwell Water. This view is shown on the image below (from Fig 9 of the draft Neighbourhood Plan).



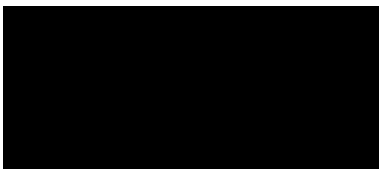
Accompanying policy FUL/01 states in point 5 that development will not be permitted where it would have an adverse impact on the rural setting of the Locally Important View. The development parcel within the approved parameter plan does extend into the area of view C6. As such, given that is an approved document, the viewpoint from C6 should be altered to ensure the approved development parcels are not sat within the view.

In its present form, the Locally Important View does conflict with an approved parameter plan, and as such, the neighbourhood Plan is not considered to meet the Basic Conditions and is considered unsound. Amendment of the View in line with the above would resolve this concern.

A copy of the decision notice for application S/0202/17/OL and the approved parameters plan (M06 rev E – Parameters Plan) listed in condition 4 is provided at the end of this letter for information.

If any further information is required, please do not hesitate to get in touch.

Yours Faithfully,



PAUL DERRY
Associate Planner

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING PERMISSION
SUBJECT TO CONDITIONS

Decision Date: 26 October 2017

Paul Derry,
Barton Willmore
St Andrews House
St Andrews Road
Cambridge
Cambridgeshire
CB4 1WB

The Council hereby grants outline planning permission for consideration of access points, for residential development of up to 110 dwellings with areas of landscaping and public open space and associated infrastructure works

At: Land at Teversham Road, Fulbourn
For: Daniel Coulson, Castlefield International Limited

In accordance with your application dated 18-Jan-2017 and the plans, drawings and documents which form part of the application, subject to conditions set out below.

1. Approval of the details of the layout of the site, including the scale and location of public open spaces and play areas, the scale and appearance of buildings, and landscaping (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before any development is commenced.
(Reason - The application is in outline only.)
2. Application for the approval of the reserved matters shall be submitted to the Local Planning Authority before the expiration of two years from the date of this permission.
(Reason - The application is in outline only.)
3. The development hereby permitted shall begin not later than the expiration of one year from the date of approval of the last of the reserved matters to be approved.
(Reason - The application is in outline only.)
4. The development hereby permitted shall be carried out in accordance with the following approved plans: M02 rev C – Site Plan; M06 rev E – Parameters Plan; P2 – 50m Exclusion Zone B; B411/008 Rev 1 – Cox's Drove Emergency Vehicle Access; and B411/SK/09 Rev 2 – Indicative Full Right Turn.
(Reason - To facilitate any future application to the Local Planning Authority under Section 73 of the Town and Country Planning Act 1990.)
5. Notwithstanding the submitted indicative layout, details of the mix of housing (including both market and affordable housing) shall submitted with any reserved matters application for housing.
(Reason: To ensure an appropriate mix of housing in accordance with policy HG/2 of the adopted

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South Cambridgeshire Development Control Policies DPD.)

6. Detailed plans and particulars of the reserved matters pursuant to condition 1 above shall be in general accordance with the illustrative layout (Drawing number 'M03 Rev C'), subject to taking into account the 50m noise exclusion zone as identified on drawing number 'P2'. The development shall be carried out in accordance with the approved details and retained as such.

(Reason - The application is in outline only.)

7. Prior to the commencement of the development full details of the tree protection measures for all trees and hedges to be retained shall be submitted to and approved in writing by the Local Planning Authority. These measures shall be set out in a detailed Arboricultural Method Statement to include the specification of the location and type of protective fencing, the timings for the erection and removal of the protective fencing, the details of any hard surfacing and underground services proposed within the root protection areas, all to be in accordance with the British Standard for Trees in Relation to Construction 5380 2000, and the monitoring of tree protection measures during construction. All tree protective measures shall be carried out as set out in the approved Arboricultural Method Statement.

(Reason: To protect the visual amenity of the area in accordance with policies).

8. Prior to the commencement of the development a detailed surface water drainage scheme for the site, based on the agreed Flood Risk Assessment (FRA) CCE/B411/FRA-03 September 2014 by Cannon Consulting Engineers has been submitted to and approved in writing by the Local Planning Authority. Such a scheme shall include details of the long term ownership/adoption of the surface water drainage system and maintenance of the same. The scheme shall be constructed, completed and properly retained /maintained thereafter in accordance with the approved plans and implementation programme agreed in writing with the Local Planning Authority.

(Reason - To ensure a satisfactory method of surface water drainage and to prevent the increased risk of flooding in accordance with Policies DP/1 and NE/11 of the adopted Local Development Framework 2007

9. Prior to the commencement of the development, a scheme for the provision and implementation of foul water drainage shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be constructed and completed in accordance with the approved plans prior to the occupation of any part of the development, or in accordance with the implementation programme agreed in writing with the Local Planning Authority and properly retained /maintained thereafter.

(Reason - To reduce the risk of pollution to the water environment and to ensure a satisfactory method of foul water drainage in accordance with Policy NE/9 of the adopted Local Development Framework 2007.)

10. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval for the remediation strategy from the Local Planning Authority. The remediation strategy shall be implemented as approved.

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(Reason - To prevent the risk of contamination to the water environment.)

11. Any removal of trees, scrub or hedgerow shall not take place in the bird breeding season between 15 February and 15 July inclusive, unless a mitigation scheme for the protection of bird-nesting habitat has been previously submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details.

(Reason - To avoid causing harm to nesting birds in accordance with their protection under the Wildlife and Countryside Act 1981 and in accordance with Policies DP/1, DP/3 and NE/6 of the adopted Local Development Framework 2007.)

12. Prior to the commencement of the development, a landscape and biodiversity management scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include full details of the landscape and ecological management objectives for the site, including but not limited to, the following points:

- i. An audit of proposed retained areas and an assessment of the existing site habitats to be retained, lost and created.
- ii. The retention of areas of grassland supporting flora of local importance in-situ
- iii. The management and protection measures for all retained habitats and species, including early marsh orchids, to prevent damage during construction.
- iv. A habitat restoration scheme for the chalk stream.
- v. The management of the surrounding tree belts and hedgerows, particularly with regard retaining dark flight corridors for bats.
- vi. The management of ponds
- vii. The management of grassland habitats
- viii. The restoration and maintenance of the ornamental garden
- ix. A reptile mitigation strategy
- x. The preparation of a work schedule
- xi. The frequency for the monitoring of habitats and notable species and means of reporting the findings to the LPA over a ten year period.
- xii. A timetable for the implementation of all of the landscape and biodiversity enhancement measures listed in the management scheme.

The scheme shall include full details of measures required to deliver the long term maintenance of the all areas providing landscape and ecological management. The measures shall also address means of public access (including boardwalks). The landscape and biodiversity management plan shall be implemented in accordance with the agreed timetable, and thereafter maintained in accordance with the agreed details.

(Reason - To enhance ecological interests in accordance with Policies DP/1, DP/3 and NE/6 of the adopted Local Development Framework 2007.)

13. Prior to the commencement of the development, ground works and/or vegetation removal, a repeat Badger Survey shall be undertaken. The findings of the Badger Survey shall be provided to the Local Planning Authority for prior written approval. The scheme shall be constructed, completed and properly retained /maintained thereafter in accordance with the agreed details.

(Reason - To enhance ecological interests in accordance with Policies DP/1, DP/3 and NE/6 of the adopted Local Development Framework 2007.)

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14. Prior to the commencement of the development, full details of a Scheme of Grassland Mitigation and Translocation has been submitted to and approved in writing by the Local Planning Authority. These measures shall include (but shall not be limited to):

- i. Botanical surveys to be undertaken in order to determine the distribution and densities of important grassland species plotted using GPS and presented on a plan.
- ii. The Scheme's aims and objectives.
- iii. The evaluation of the ecological, hydrological and geological requirements of the important grassland species.
- iv. The selection of suitable receptor sites.
- v. A method statement for the grassland removal.
- vi. The location of works and/or measures required to successfully implement the translocation.
- vii. Full details of long-term management and ownership of the receptor sites.
- viii. Details of the persons responsible for the implementation of the Scheme.
- ix. A timeframe for the Scheme's implementation.
- x. Measures for the monitoring of the Scheme for a minimum period of twenty five.

The agreed mitigation and translocation scheme shall be carried out as approved and the site maintained and managed thereafter in accordance with it.

(Reason - To mitigate ecological interests in accordance with Policies DP/1, DP/3 and NE/6 of the adopted Local Development Framework 2007.)

15. Prior to the commencement of the development, a scheme for the provision and location of fire hydrants to serve the development has been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the approved scheme has been implemented.

(Reason - To ensure an adequate water supply is available for emergency use.)

16. Prior to the commencement of the development, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved by the local planning authority for that development, hereby permitted. The CEMP shall accord and give effect to the waste management principles set out in the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Waste Hierarchy. The CEMP shall address the following aspects of construction:

- i. A construction programme;
- ii. Contractor's access arrangements for vehicles, plant and personnel including the location of construction traffic routes to, from and within the site, details of their signing, monitoring and enforcement measures, along with the location of parking for contractors and construction workers;
- iii. Construction hours;
- iv. Delivery times for construction purposes;
- v. Soil Management Strategy including a method statement for the stripping of top soil for re-use; the raising of land levels (if required); and arrangements (including height and location of stockpiles) for temporary topsoil and subsoil storage to BS3883:2007;
- vi. Noise monitoring method including location, duration, frequency and reporting of results to the Local Planning Authority in accordance with the provisions of BS 5228 (1997);
- vii. A construction noise impact assessment and a report/method statement detailing predicted construction noise and vibration levels at noise sensitive premises, and consideration of mitigation measures to be undertaken to protect local residents from construction noise and/or vibration. Potential construction noise and vibration levels at the nearest noise sensitive locations shall be

TOWN AND COUNTRY PLANNING ACT 1990

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predicted in accordance with the provisions of BS 5228:2009+A1:2014: 'Code of practice for noise and vibration control on construction and open sites - Part 1: Noise and Part 2: Vibration.

viii. A programme of measures to minimise the spread of airborne dust (including consideration of wheel washing and dust suppression provisions) from the site during the construction period or relevant phase of development.

ix. Site lighting during construction;

x. Drainage control measures including the use of settling tanks, oil interceptors and bunds;

xi. Screening and hoarding details;

xii. Access and protection arrangements around the site for pedestrians, cyclists and other road users;

xiii. Procedures for interference with public highways (including rights of way), permanent and temporary realignment, diversions and road closures;

xiv. External safety and information signing and notices;

xv. Liaison, consultation and publicity arrangements including dedicated points of contact;

xvi. Consideration of sensitive receptors;

xvii. Prior notice of agreement of procedures for works outside agreed limits;

xviii. Complaints procedures, including complaints response procedures;

xix. Location of Contractors compound and method of moving materials, plant and equipment around the site.

The CEMP shall be implemented in accordance with the approved details.

(Reason - To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers in accordance with the aims of Policies DP/3, DP/6 and NE/15 of the South Cambridgeshire Local Development Framework Development Control Policies 2007, and to comply with the Guidance for Local Planning Authorities on Implementing Planning Requirements for the European Union waste Framework Directive (32008/98/EC), Department for Communities and Local Government, December 2012.)

17. Prior to the commencement of development a full Site Waste Management Plan and Waste Audit shall be submitted in writing and approved by the Local Planning Authority. These shall include details of:

i. Construction waste infrastructure dealing with how inert waste arisings will be managed/recycled during the construction process;

ii. Anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste;

iii. Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site;

iv. Any other steps to ensure the minimisation of waste during construction;

v. The location and timing of provision of facilities pursuant to criteria i), ii), iii) and iv) Proposed monitoring and timing of submission of monitoring reports;

vi. The proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management and monitoring of construction;

vii. A RECAP Waste Management Guide toolkit, including a contributions assessment, shall be completed with supporting reference material;

Proposals for the management of municipal waste generated during the construction phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to

TOWN AND COUNTRY PLANNING ACT 1990

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storage and collection points by users and waste collection vehicles is required.

(Reason - To ensure that waste arising from the development is minimised and that which is produced is handled in such a way that it maximises opportunities for re-use and recycling in accordance with Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011), and Policy DP/6 of the South Cambridgeshire Local Development Framework Development Control Policies DPD (2007)

18. Prior to the commencement of the development an artificial lighting scheme, to include details of any external lighting of the site such as street lighting, floodlighting, security/residential lighting and an assessment of impact on any sensitive residential premises on and off site, shall be submitted to and approved in writing by the local planning authority. The approved lighting scheme shall be installed, maintained and operated in accordance with the approved details/ measures. (Reason: To protect local residents from light pollution/ nuisance and protect/ safeguard the amenities of nearby residential properties in accordance with NE/14 Lighting Proposals.)

19. Concurrently with any reserved matters application and prior to commencement of development a noise mitigation/ insulation scheme to protect occupants externally and internally from rail noise to the north and noise emanating from the Breckenwood Industrial Estate to the north west, shall be submitted to and approved in writing by the local planning authority. The noise insulation scheme shall have regard to site layout/orientation, internal room configuration, building fabric and glazing acoustic performance and adequate provision of rapid ventilation for thermal comfort or similar and shall demonstrate that the external and internal noise levels recommended in British Standard 8233:2014 "Guidance on sound insulation and noise reduction for buildings"(or as superseded) shall be achieved. If the internal noise levels recommended in BS 8233 cannot be achieved with partially open windows/ doors, then any scheme shall have particular regard to alternative forms of rapid/ purging ventilation such as mechanical or passive acoustic vents to facilitate ventilation/ thermal comfort cooling. The scheme as approved shall be fully implemented before the residential use hereby permitted is occupied and shall be retained thereafter. (Reason - To ensure that sufficient noise mitigation/ attenuation is provided to all residential properties to protect occupiers externally and internally from the impact of rail and industrial noise and to safeguard the health, amenity and quality of life of future residents in accordance with paragraphs 109 and 123 of the NPPF and Policy NE/15 Noise Pollution of the adopted LDF 2007

20. No dwellings or private gardens shall be sited within the residential no build/ exclusion zone as detailed on the Barton Willmore drawing 'Land at Teversham Road, Fulbourn Project, Drawing title: 50m Exclusion Zone B, dated 1st April 2014, Project No. 22403' unless and until a detailed noise mitigation strategy and/ or detailed insulation scheme to address the off-site operational noise of the Breckenwood Industrial Estate, has been submitted to and approved in writing by the Local Planning Authority. Occupation of any dwelling within the identified exclusion zone shall not take place until those works have been completed in accordance with the approved details and post installation acoustic/ noise testing to demonstrate effectiveness of the works have been certified as complete and approved in writing by the local planning authority. The scheme/ strategy shall be maintained as such thereafter.

(Reason: To ensure that sufficient noise mitigation/ attenuation is provided to all residential properties to protect occupiers externally and internally from the impact of industrial noise and to safeguard the health, amenity and quality of life of future residents in accordance with paragraphs

TOWN AND COUNTRY PLANNING ACT 1990

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SUBJECT TO CONDITIONS

Decision Date: 26 October 2017

109 and 123 of the NPPF and Policy NE/15 Noise Pollution of the adopted LDF 2007.)

21. No demolition or construction works shall commence on site until a Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. The principal areas of concern that should be addressed are:

- i. Movements and control of muck away lorries (all loading and unloading should be undertaken off the adopted public highway);
- ii. Contractor parking should be within the curtilage of the site and not on street;
- iii. Movements and control of all deliveries (all loading and unloading should be undertaken off the adopted public highway);
- iv. Control of dust, mud and debris.

(Reason - In the interests of highway safety in accordance with policy DP/3 of the Local Development Framework)

22. The dwellings shall not be occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority for that use. The Plan shall be implemented in accordance with the approved details.

(Reason - To reduce car dependency and to promote alternative modes of travel in accordance with Policy TR/3 of the adopted Local Development Framework 2007.)

23. The occupation of any particular dwelling hereby permitted, shall not commence until appropriate car parking, and covered and secure cycle parking has been provided within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. The car parking and cycle parking shall thereafter be implemented and maintained in accordance with the approved details.

(Reason - To ensure the provision of covered and secure cycle parking in accordance with Policy TR/2 of the adopted Local Development Framework 2007.)

24. The main site access and emergency access, as shown on drawing nos: M06 E; B411/SK/09 Rev 2; B411/008 Rev 1 shall be constructed so that its falls and levels are such that no surface water from the site drains across or onto the public highway.

(Reason – for the safe and effective operation of the highway in accordance with Policy DP/3 of the adopted Local Development Framework 2007).

25. The proposed main site access and emergency access, as shown on drawing nos: M06 E; B411/SK/09 Rev 2; B411/008 Rev 1, shall be constructed using a bound material to prevent debris spreading onto the adopted public highway.

(Reason – In the interests of highway safety in accordance with Policy DP/3 of the adopted Local Development Framework 2007).

26. Prior to the commencement of the development, a scheme for the following highway improvement works shall be submitted to and approved in writing by the Local Planning Authority :

- i. Provide footway links to connect the existing footways in the vicinity of the site with closest bus stops to the site.
- ii. Widening of the Footway/cycleway on Hinton Road to facilitate cycle accessibility to the wider Cambridge cycle network.

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iii. Improvements to the Hinton Road/ Fulbourn Old Drift uncontrolled crossing facilities.

iv. Provide drop kerb facilities on The Maples, Birdfarm Road, The Haven, Haggis Gap and Swifts Corner junctions to ensure accessibility by pedestrians to key facilities in Fulbourn including the primary school.

The highway improvement works shall be carried out in accordance with a programme for their implementation and in accordance with the approved details.

(Reason - for the safe and effective operation of the highway in accordance with Policy DP/3 of the adopted Local Development Framework 2007)

27. Prior to the commencement of the development, a scheme for the provision of on-site renewable energy to meet 10% of the projected energy requirements of the development has been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and maintained in accordance with the approved scheme.

(Reason - To ensure an energy efficient and sustainable development in accordance with the details submitted with the application and to meet the aims of Policies NE/1 and NE/3 of the adopted Local Development Framework 2007.)

28. Notwithstanding the particulars shown on the parameters plan, the numbers of storeys and the height of the eaves and ridge above AOD of any built development hereby approved shall be determined through Reserved Matters applications.

(Reason - In the interests of residential/visual amenity, in accordance with Policy DP/3 of the adopted Local Development Framework 2007.)

29. Prior to the occupation of any dwellings, an Electric Vehicle (EV) Charging Plan (which is integrated into the landscaping plan) shall be submitted to and approved in writing by the Local Planning Authority. The Plan should include the details of the number, location, installation and management of EV charging points and the provision of cabling infrastructure. The Electric Vehicle Charging Plan shall be implemented in accordance with the agreed details prior to the occupation of the 50th dwelling, and thereafter maintained in accordance with the agreed details.

(Reason - In the interest of reducing carbon dioxide emissions, in accordance with South Cambridgeshire (LDF) Development Control Policies (DPD 2007), policy NE/1, NE/2 and NE/3 - and TR/1-4)

Informatives

1. It is an offence under the Highways Act 1980 to deposit mud or debris onto the adopted public highway.

2. The development shall be carried out in accordance with the signed s106 agreement dated 25 October 2017

General

1. **Statement as to how the Local Planning Authority (LPA) has worked with the applicant in a positive and proactive manner on seeking solutions**

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The LPA positively encourages pre-application discussions. Details of this advice service can be found on the Planning pages of the Council's website www.scambs.gov.uk. If a proposed development requires revisions to make it acceptable the LPA will provide an opinion as to how this might be achieved. The LPA will work with the applicant to advise on what information is necessary for the submission of an application and what additional information might help to minimise the need for planning conditions. When an application is acceptable, but requires further details, conditions will be used to make a development acceptable. Joint Listed Building and Planning decisions will be issued together. Where applications are refused clear reasons for refusal will identify why a development is unacceptable and will help the applicant to determine whether and how the proposal might be revised to make it acceptable.

In relation to this application, it was considered and the process managed in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

2. Circular 04/2008 (Planning Related Fees) states that where an application is made under Article 21 of the Town and Country Planning (General Development Procedure) Order 1995 [now superseded by Article 30 of the Town and Country Planning (Development Management Procedure)(England) Order 2010], a fee will be payable for any consent, agreement or approval required by condition or limitation attached to the grant of planning permission (or reserved matter consent).

The fee is £97 per request or £28 where the permission relates to an extension or alteration to a dwellinghouse or other development in the curtilage of a dwellinghouse. The request can be informal through the submission of a letter or plans, or formal through the completion of an application form and the submission of plans. Any number of conditions may be included on a single request. The form is available on the Council's website www.scambs.gov.uk (application forms - 1app forms-application for the approval of details - pack 25.)

3. It is important that all conditions, particularly pre-commencement conditions, are fully complied with, and where appropriate, discharged prior to the implementation of the development. Failure to discharge such conditions may invalidate the planning permission granted. The development must be carried out fully in accordance with the requirements of any details approved by condition.
4. In order to obtain an official postal address, any new buildings should be formally registered with South Cambridgeshire District Council. Unregistered addresses cannot be passed to Royal Mail for allocation of postcodes. Applicants can find additional information, a scale of charges and an application form at www.scambs.gov.uk/snn. Alternatively, applicants can contact the Address Management Team: call 08450 450 500 or email address.management@scambs.gov.uk. Please note new addresses cannot be assigned by the Council until the footings of any new buildings are in place.
5. All new buildings that are to be used by the public must, where reasonable and practicable, be accessible to disabled persons and provide facilities for them. The applicant's attention is therefore drawn to the requirements of Section 76 of the Town and Country Planning Act

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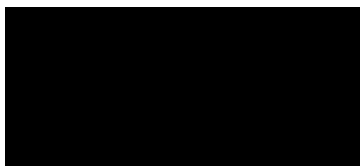
PLANNING PERMISSION
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1990 and the Building Regulations 2000 (as amended) with respect to access for disabled people.

6. The applicant's attention is drawn to the requirements of the Party Wall etc. Act 1996 if works are proposed to a party wall.
7. If you wish to amend the permitted scheme, and you consider the revisions raise no material issues, you should make an application for a Non Material Amendment. If agreed, the development can go ahead in accordance with this amendment although the revised details will not replace the original plans and any conditions attached to the originally approved development will still apply. If, however, you or the Council consider the revisions raise material issues you may be able to make an application for a Minor Material Amendment. If approved, this will result in a new planning permission and new conditions as necessary may be applied. Details for both procedures are available on the Council's website or on request.
8. If this development involves any works of a building or engineering nature, please note that before any such works are commenced it is the applicant's responsibility to ensure that, in addition to planning permission, any necessary consent under the Building Regulations is also obtained. Advice in respect of Buildings Regulations can be obtained from Building Control Services at South Cambridgeshire District Council. Their contact details are: tel. 03450 450 500 or building.control@scambs.gov.uk or via the website www.scambs.gov.uk.
9. A delegation report or committee report, setting out the basis of this decision, is available on the Council's website.

To help us enhance our service to you please click on the link and complete the customer service questionnaire: www.surveymonkey.com/s/2S522FZ



Stephen Kelly

Joint Director for Planning and Economic Development for Cambridge and South Cambridgeshire

South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

THIS PERMISSION DOES NOT CONSTITUTE APPROVAL UNDER BUILDING REGULATIONS AND IS NOT A LISTED BUILDING CONSENT OR CONSERVATION AREA CONSENT. IT DOES NOT CONVEY ANY APPROVAL OR CONSENT WHICH MAY BE REQUIRED UNDER ANY ENACTMENT, BYE-LAW, ORDER OR REGULATION OTHER THAN SECTION 57 OF THE TOWN AND COUNTRY PLANNING ACT 1990.

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL
CAMBRIDGESHIRE

Form 4
Ref. S/0202/17/OL

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING PERMISSION
SUBJECT TO CONDITIONS

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SEE NOTES OVERLEAF

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NOTES

Appeals to the Secretary of State

If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State for the Environment under Section 78 of the Town and Country Planning Act 1990.

If you want to appeal, then you must do so using a form which you can get from the Customer Support Unit, Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN.

Alternatively, an online appeals service is available through the Appeals area of the Planning Portal - see www.planningportal.gov.uk/pcs. The Planning Inspectorate will publish details of your appeal on the internet. This may include a copy of the original planning application form and relevant supporting documents supplied to the local authority, together with the completed appeal form and information you submit to the Planning Inspectorate. Please ensure that you only provide information you are happy will be made available to others in this way, including personal information belonging to you. If you supply personal information belonging to a third party please ensure you have their permission to do so. More detailed information about data protection and privacy matters is available on the Planning Portal.

Fully completed appeal forms must be received by the Planning Inspectorate within six months of the date of this decision notice except where the property is subject to an enforcement notice, where an appeal must be received within 28 days.

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving the notice of appeal.

The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based its decision on a direction given by him.

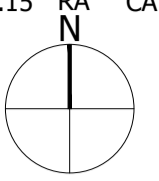
Purchase Notices

If either the Local Planning Authority or the Secretary of State for the Environment refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonable beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

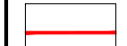






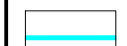





In these circumstances, the owner may serve a purchase notice on the District Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

The scaling of this drawing cannot be assured

Revision	Date	Drm	Ckd
A	14.07.14	AA	CA
B	24.07.14	HS	CA
C	27.08.14	HS	CA
D	17.09.14	AA	CA
E	05.01.15	RA	CA

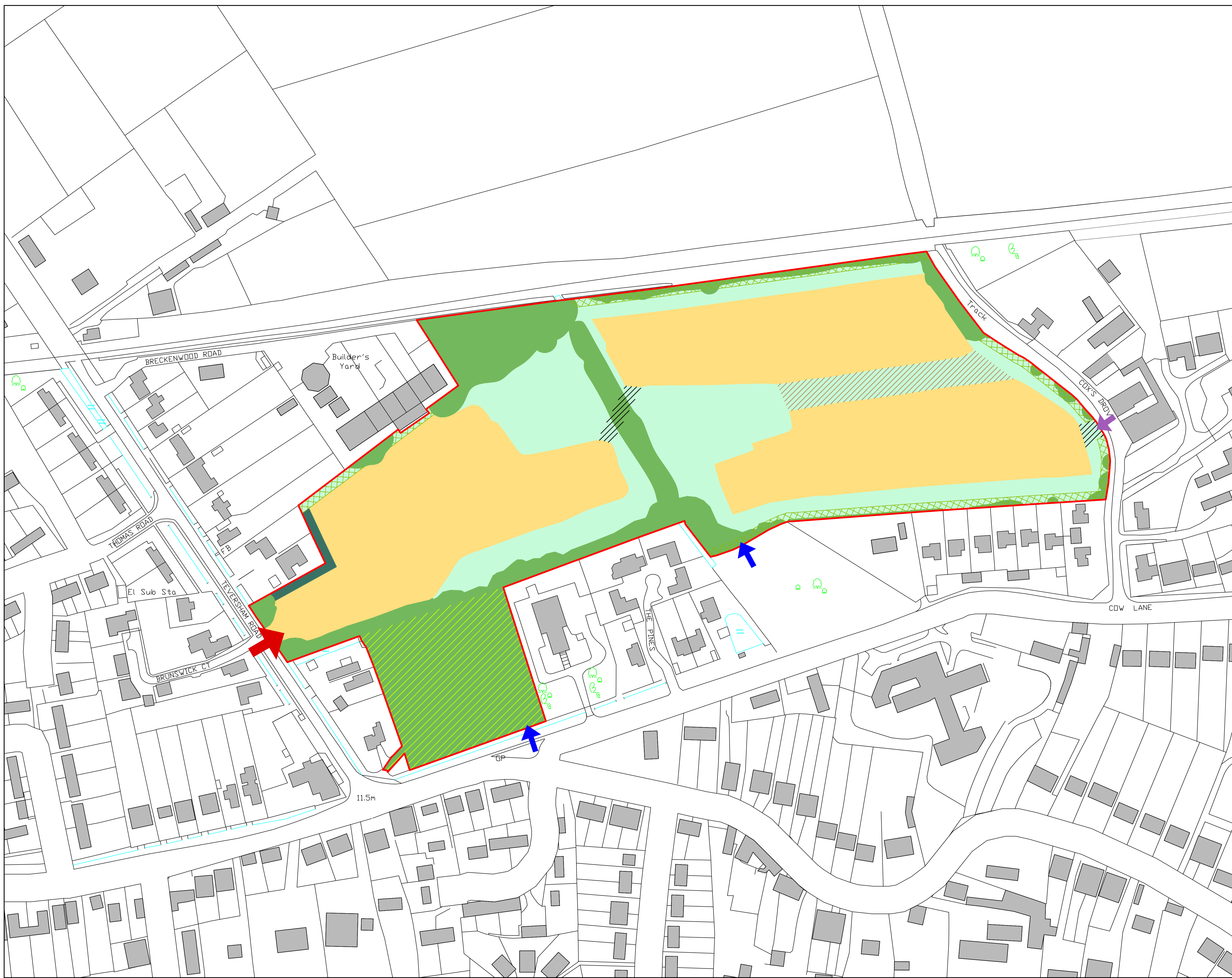


Legend

-  Application Site Boundary
-  Residential Development, up to 2.5 storey
Eaves height above grade - up to 6m
Ridge height above grade - up to 10.5m
-  Open Space, including proposed planting, children's play areas, footpaths, boardwalks, SuDS and occasional parking
-  Existing Vegetation, including root protection areas, to be retained, managed and enhanced
Note: clearance as necessary to enhance stream ecology and accommodate vehicular route as indicated and pedestrian/cycle crossings as appropriate
-  Proposed Boundary Planting (included in rear gardens)
-  New Boundary Planting within Open Space
-  Existing Watercourse
-  Zone for Vehicular Route
-  Zone for up to 2 Vehicular Links
-  Ornamental Garden retained and enhanced
-  Primary vehicular access point
-  Pedestrian/cycle/emergency access
-  Pedestrian/cycle access

Area Schedule

Open Space: 1.84ha
 Existing Vegetation, including the Ornamental Garden: 1.65ha
 Proposed Boundary Planting: 0.03ha
 Residential Development: 3.33ha
 Total Site Area: 6.85ha



Project
Land at Teversham Road
Fulbourn
 Drawing Title
Parameters Plan

Date	Scale	Drawn by	Check by
11.07.14	1:1000@A1	AA	CA
Project No	Drawing No	Revision	
22430	M06	E	



Planning • Master Planning & Urban Design
 Architecture • Landscape Planning & Design • Project Services
 Environmental & Sustainability Assessment • Graphic Design

bartonwillmore.co.uk

59375

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Defence Infrastructure Organisation**Date received:** 17/01/2022 via Email**Summary:**

The MOD would wish to be consulted within the Fulbourn Neighbourhood Plan of any potential development within the Aerodrome Height, Technical and Birdstrike safeguarding zones surrounding Cambridge Airport which consists of structures or buildings exceeding statutory safeguarding height or technical zones. In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused.

Full text:

-

Change suggested by respondent:

-

Attachments: Response - <https://cambridge.oc2.uk/a/3v5t3>



Ministry of Defence

Planning Policy Team
SCDC
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore
Defence Infrastructure Organisation
St Georges House
DIO Head Office
DMS Whittington
Lichfield
Staffordshire
WS14 9PY
Tel: [REDACTED]
E-mail: [REDACTED]
www.mod.uk/DIO

17th January 2022

Your Ref: South Cambridgeshire District Council - Fulbourn Neighbourhood Plan
DIO Ref: 10053208

Dear Sir/Madam,

It is understood that South Cambridgeshire District Council are undertaking a Consultation regarding the submission of the Fulbourn Neighbourhood Plan.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

Having reviewed the supporting documentation in respect of the Fulbourn Neighbourhood Plan, the MOD have an area of interest in Cambridge Airport

The authority area of the Fulbourn Neighbourhood Plan encompasses areas within the statutory Aerodrome Height, Birdstrike and Technical safeguarding zones surrounding the aerodrome. Cambridge Airport lies approximately 1.8km North of the Fulbourn Neighbourhood Plan authority area.

The statutory Aerodrome Height and Technical safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

Within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate birdstrike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments as well as the creation of new waterbodies.

Sustainable Urban Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

Within Policy FUL/03 - Green Infrastructure Network, the area's designated within Figure 11 of the Fulbourn Neighbourhood Plan fall within the statutory Aerodrome Height, Birdstrike and Technical safeguarding zones surrounding Cambridge Airport. Therefore, we would need to be consulted on any development which consists of structures or buildings exceeding statutory safeguarding height or technical zones, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation

In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.

In summary, the MOD would wish to be consulted within the Fulbourn Neighbourhood Plan of any potential development within the Aerodrome Height, Technical and Birdstrike safeguarding zones surrounding Cambridge Airport which consists of structures or buildings exceeding statutory safeguarding height or technical zones. In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



Chris Waldron
DIO Assistant Safeguarding Manager

59326

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Ely Diocesan Board of Finance**Agent:** Carter Jonas**Date received:** 17/01/2022 via Web**Summary:****Full text:**

REPRESENTATIONS TO REG.16 DRAFT SUBMISSION FULBOURN NEIGHBOURHOOD PLAN

Planning Objectives
OBJECT

Paragraph 5.6 of the Draft Submission Fulbourn Neighbourhood Plan (Draft FNP) identifies the planning objectives for the document. There are three planning objectives that are relevant to these representations for Ely Diocesan Board of Finance (EDBF), which are as follows: 4. Have a mix of housing that is affordable, available, and suitable for all ages and appropriate to the village location; 5. Support business development and employment opportunities; and 6. Improve amenities and community facilities.

As highlighted in the representations to Section 10: Housing, Draft FNP does not allocate any land for housing development, and the outstanding housing commitments for major development (at the Ida Darwin Hospital and land off Teversham Road sites) already define affordable housing obligations with only a small proportion specifically directed to those with a local connection to Fulbourn. As such, Draft FNP would have no influence on the delivery of affordable housing in Fulbourn because decisions about housing and affordable housing within the village have already been taken. Draft FNP does not seek to address the current identified needs for affordable housing for those with a local connection or the concerns raised by residents and employers about housing affordability. It is considered that Planning Objective No.4 is ineffective because affordable housing needs for those with a local connection will remain unmet during the plan period to 2031.

As highlighted in the representations to Policy FUL/13: Large Employment Sites, Draft FNP contains no employment allocations, and seeks to add new additional policy designations that are designed to prevent new employment development from coming forward through the emerging Greater Cambridge Local Plan process. It is considered that Draft FNP does not support business development and employment opportunities and seeks to prevent the expansion of existing employment areas including Capital Park in the future, and as such Planning Objective No.5 is ineffective.

As highlighted in the representations to Policies FUL/14: Community Facilities and FUL/15: Healthcare Facilities, it is not clear whether there is landowner agreement for the proposed extension to the recreation ground, how or where the proposed new multi-purpose health centre would be provided, or where the community aspiration for additional allotments would be located. It is noted that the housing commitments at the Ida Darwin Hospital and land off Teversham Road sites already define planning obligations for health and community facilities, and include health service funding for Cherry Hinton Health Centre. Draft FNP contains no strategy to ensure the delivery or funding of these community facilities during the plan period to 2031, and as such Planning Objective No.6 is ineffective because the amenities and community facilities in the village would not be improved. Draft FNP ignores the fact that new recreation, health, and community facilities are typically delivered in conjunction with new development or funded in part by planning obligations derived from new development, but does not consider this approach to deliver new or improved facilities.

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection, to support and not prevent additional employment development, and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, to achieve Planning Objectives No.4, No.5 and No.6.

Figure 8: Neighbourhood Plan Policy Map Summary
OBJECT

EDBF owns land south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (north of Shelford Road and adjacent to Fulbourn). A site location plan showing both sites is enclosed with these representations. These sites are located within the Green Belt as defined on the Proposals Map of the adopted South Cambridgeshire Local Plan. As set out below, these sites would be directly affected by some of the proposed new policy designations within Draft FNP.

The land owned by EDBF at Fulbourn has been promoted for through the call for sites process of the emerging Greater Cambridge Local Plan for the following uses: the land south of Fulbourn Old Drift is promoted for office and research related employment development as an extension to Capital Park, with a new access and strategic landscaping; and, the eastern field at the land south of Cambridge Road is promoted for residential development including affordable housing and self/custom build plots, with a primary school, local centre, community facilities, open space and other green

infrastructure.

The land south of Fulbourn Old Drift is included within the proposed 'important visual gap' designation, the site boundary is proposed to be defined as an important countryside gap, and a 'locally important view' is identified from Cambridge Road to the south of the site (Ref. B3).

The land south of Cambridge Road is within two 'locally important views', one from Shelford Road towards the village (Ref. B2) and another from the edge of the village on Cambridge Road (Ref. C4).

The adopted South Cambridgeshire Local Plan 2018 includes policies on the Green Belt (Policy S/4) and Development Frameworks (Policy S/7). The adopted Policies Map defines the boundaries for both these designations. Policy S/4 refers to national Green Belt policy, which is set out in Section 13 of the NPPF. The principles of openness, preventing unrestricted sprawl and the coalescence of settlements, safeguarding the countryside from encroachment, and protecting the setting of settlements is already established in national Green Belt policy – see Paragraphs 137 and 138. Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. It is not necessary for Figure 8 (or Figure 9) to repeat development plan designations or national guidance on the Green Belt. There is no evidence to explain why the 'important visual gap' designation is necessary when the existing Green Belt designation already addresses openness and coalescence. Therefore, Figure 8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that the proposed 'important visual gap' designation is deleted from Figure 8.

Evidence Paper 1: Key Village Views, prepared to support Draft FNP, claims to provide the evidence for the 'locally important views' designation. However, it is noted that there are no photographs or illustrative material provided in Evidence Paper 1 to show those important views or to highlight their particular importance. The 'view' from Cambridge Road adjacent to the southern boundary of Capital Park in the direction of Fulbourn (Ref. B3) is of the main road with trees and hedgerows either side, and a substantial area of trees and vegetation to the north and agricultural fields to the south; it is noted that no part of Fulbourn village is visible from this location, and there are no landmarks or features that make this 'view' particularly important to justify special protection. The 'view' from Shelford Road towards the village (Ref. B2) includes Fulbourn Windmill and the main road, agricultural fields, and the edge of the village; it is noted that some of the housing on the edge of the village is clearly visible with no landscaping provided at the site boundary. The 'view' west from the edge of the village on Cambridge Road (Ref. C4) includes Fulbourn Windmill and the main road with hedgerows either side; it is noted that the Windmill is clearly visible from this location and that 'view' should be retained, but the edge of Cambridge and the wider countryside is not visible from this location because of the topography (Cambridge is visible from the Windmill not from the edge of the village). It should be noted that all of the 'locally important views' are of land within the Green Belt and outside the defined Development Framework boundary for the village. In addition, the Fulbourn Village Design Statement, which is related to Policy HQ1: Design Principles of the adopted South Cambridgeshire Local Plan, already identifies these same 'views'. Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. It is not necessary for 'locally important views' to be identified in areas defined as Green Belt, and where development plan design policies and related guidance already deals with the protection of landscape, heritage assets, character etc. There is no evidence to justify the 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) when no part of Fulbourn village or Fulbourn Windmill is visible from this location. The Fulbourn Village Design Statement, which is adopted guidance, already identifies these same 'views' and it is not necessary to repeat that guidance in Draft FNP. Therefore, Figure 8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted from Figure 8. All the 'locally important views' could be deleted since they are already contained in the Fulbourn Village Design Statement.

Evidence Paper 2: Important Countryside Frontages, prepared to support Draft FNP, claims to provide the evidence for the proposed new important countryside frontage designations, including at the boundary of Capital Park. Policy NH/13 of the adopted South Cambridgeshire Local Plan sets out the policy for important countryside frontages. Important countryside frontages are defined where land with a strong countryside character penetrates the urban area or where land provides an important rural break between detached parts of a development framework boundary. It is noted that the site boundary of Capital Park is not identified as an important countryside frontage in the adopted Local Plan. Capital Park is located within the Green Belt, the countryside does not penetrate the urban area in this location, and there are no defined settlement framework boundaries in this location or adjacent areas. The distance between the defined settlement framework boundaries, located on the edge of Cambridge at Yarrow Road and on the western edge of Fulbourn, is approximately 1.4km and as such are not nearby to one another. Therefore, the land south of Fulbourn Old Drift and adjacent to Capital Park does not satisfy any of the criteria for designation as an important countryside frontage. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. The evidence put forward to justify the proposed important countryside frontage designation at Capital Park is not robust, and is not consistent with the criteria for such a designation. It is requested that the proposed important countryside frontage designation at Capital Park is deleted from Figure 8.

Requested Change

The following changes are requested to Figure 8.

The proposed 'important visual gap' designation is deleted.

The 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted.

All the 'locally' important views' could be deleted since they are already contained in the Fulbourn Village Design Statement.

The proposed important countryside frontage designation at Capital Park is deleted.

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

Policy FUL/01 seeks to protect the setting of Fulbourn, and refers to an important visual gap, important countryside frontages, locally important views, and openness and appearance of fields. It also refers to the guidance provided in the Fulbourn Village Design Guide.

EDBF owns land south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (north of Shelford Road and adjacent to Fulbourn), which are affected by the proposed new policy designations identified in Policy FUL/01. The land south of Fulbourn Old Drift is included within the proposed 'important visual gap' designation, the site boundary is proposed to be defined as an important countryside gap, and a 'locally important view' is identified from Cambridge Road to the south of the site (Ref. B3). The land south of Cambridge Road is within two 'locally important views', one from Shelford Road towards the village (Ref. B2) and another from the edge of the village on Cambridge Road (Ref. C4).

In summary, the Green Belt and the Development Framework boundaries in the adopted South Cambridgeshire Local Plan 2018 already limits the extent of development around the village, and severely restrict the possibility of any major new development coming forward in the future other than existing commitments which already have planning permission. It is noted that Draft FNP makes no allocations for residential, employment or any other types of development. There are policies in the adopted Local Plan that do allow recreation facilities and rural exception affordable housing in the Green Belt. The designated village amenity areas, local green space and important countryside frontage designations in the adopted Local Plan identify areas within the Development Framework boundary of the village where additional development of all types is prevented. As explained in these representations, it is considered that Draft FNP seeks to identify additional policy designations around all parts of the village to prevent any major development from coming forward or being allocated through the emerging Greater Cambridge Local Plan process.

Bullet Point No.2 of Policy seeks to identify an 'important visual gap' designation on the edge of Cambridge, which overlaps with the existing Green Belt designation. The adopted South Cambridgeshire Local Plan 2018 includes policies on the Green Belt (Policy S/4) and Development Frameworks (Policy S/7). The adopted Policies Map defines the boundaries for both these designations. Policy S/4 refers to national Green Belt policy, which is set out in Section 13 of the NPPF. The principles of openness, preventing unrestricted sprawl and the coalescence of settlements, safeguarding the countryside from encroachment, and protecting the setting of settlements is already established in national Green Belt policy – see Paragraphs 137 and 138. Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. It is not necessary for Figure 8 (or Figure 9) to repeat development plan designations or national guidance on the Green Belt. There is no evidence to explain why the 'important visual gap' designation is necessary when the existing Green Belt designation already addresses openness and coalescence. Therefore, Figure 8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that the proposed 'important visual gap' designation is deleted from Policy FUL/01 and from Figures 8 and 9.

Bullet Point No.3 of Policy FUL/01 relates to Important Countryside Frontages, which are identified in Figures 8 and 9, and refers to Policy NH/13 of the adopted South Cambridgeshire Local Plan. Evidence Paper 2: Important Countryside Frontages claims to provide the evidence for the proposed new important countryside frontage designations, including at the boundary of Capital Park. Policy NH/13 of the adopted South Cambridgeshire Local Plan sets out the policy for important countryside frontages. Important countryside frontages are defined where land with a strong countryside character penetrates the urban area or where land provides an important rural break between detached parts of a development framework boundary. It is noted that the site boundary of Capital Park is not identified as an important countryside frontage in the adopted Local Plan. Capital Park is located within the Green Belt, the countryside does not penetrate the urban area in this location, and there are no defined settlement framework boundaries in this location or adjacent areas. The distance between the defined settlement framework boundaries, located on the edge of Cambridge at Yarrow Road and on the western edge of Fulbourn, is approximately 1.4km and as such are not nearby to one another. Therefore, the land south of Fulbourn Old Drift and adjacent to Capital Park does not satisfy any of the criteria for designation as an important countryside frontage. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. The evidence

put forward to justify the proposed important countryside frontage designation at Capital Park is not robust, and is not consistent with the criteria for such a designation. It is requested that the proposed important countryside frontage designation around the boundary of Capital Park is deleted from Policy FUL/01 and from Figures 8 and 9.

Bullet Point No.4 of Policy FUL/01 refers to locally important views, which are identified in Figure 9. Evidence Paper 1: Key Village Views, prepared to support Draft FNP, claims to provide the evidence for the 'locally important views' designation. However, it is noted that there are no photographs or illustrative material provided in Evidence Paper 1 to show those important views or to highlight their particular importance. The 'view' from Cambridge Road adjacent to the southern boundary of Capital Park in the direction of Fulbourn (Ref. B3) is of the main road with trees and hedgerows either side, and a substantial area of trees and vegetation to the north and agricultural fields to the south; it is noted that no part of Fulbourn village is visible from this location, and there are no landmarks or features that make this 'view' particularly important to justify special protection. The 'view' from Shelford Road towards the village (Ref. B2) includes Fulbourn Windmill and the main road, agricultural fields, and the edge of the village; it is noted that some of the housing on the edge of the village is clearly visible with no landscaping provided at the site boundary. The 'view' west from the edge of the village on Cambridge Road (Ref. C4) includes Fulbourn Windmill and the main road with hedgerows either side; it is noted that the Windmill is clearly visible from this location and that 'view' should be retained, but the edge of Cambridge and the wider countryside is not visible from this location because of the topography (Cambridge is visible from the Windmill not from the edge of the village). It should be noted that all of the 'locally important views' are of land within the Green Belt and outside the defined Development Framework boundary for the village. In addition, the Fulbourn Village Design Statement, which is related to Policy HQ1: Design Principles of the adopted South Cambridgeshire Local Plan, already identifies these same 'views'. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that "It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence". It is not necessary for 'locally important views' to be identified in areas defined as Green Belt, and where development plan design policies and related guidance already deals with the protection of landscape, heritage assets, character etc. There is no evidence to justify the 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) when no part of Fulbourn village or Fulbourn Windmill is visible from this location. The Fulbourn Village Design Statement, which is adopted guidance, already identifies these same 'views' and it is not necessary to repeat that guidance in Draft FNP. Therefore, Figure 8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted from Figure 8. All the 'locally' important views' could be deleted since they are already contained in the Fulbourn Village Design Statement.

Bullet Point No.5 of Policy FUL/01 seeks to avoid adverse impacts on the openness and appearance of fields that contribute to the setting of the 'locally important views'. The adopted South Cambridgeshire Local Plan 2018 includes policies on the Green Belt (Policy S/4) and Development Frameworks (Policy S/7). The adopted Policies Map defines the boundaries for both these designations. Policy S/4 refers to national Green Belt policy, which is set out in Section 13 of the NPPF. The principles of openness, preventing unrestricted sprawl and the coalescence of settlements, safeguarding the countryside from encroachment, and protecting the setting of settlements is already established in national Green Belt policy – see Paragraphs 137 and 138. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Bullet Point No.5 of Policy FUL/01 to repeat development plan and national guidance on openness of the Green Belt or development plan policies restricting development outside village boundaries. Therefore, Policy FUL/01 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

Bullet Point No.6 refers to the Fulbourn Village Design Guide. The Guide is adopted as a supplementary planning document, and provides design guidance for the village in the context of Policy HQ1: Design Principles of the adopted South Cambridgeshire Local Plan. Therefore, any development proposals in Fulbourn would already be assessed against Policy HQ1 and the guidance in the Fulbourn Village Design Guide. Criteria (f) of Paragraph 16 of the NPPF seeks to avoid the duplication of policies, and therefore it is not necessary for Bullet Point No.6 of Policy FUL/01 to repeat existing development plan policy and adopted guidance, and does not meet Basic Condition (a). It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6. Furthermore, the Fulbourn Village Design Guide does not provide the evidence to explain or justify the 'important visual gap' and 'locally important views' designations referred to in Policy FUL/01.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that the proposed 'important visual gap' designation is deleted from Policy FUL/01 and from Figures 8 and 9.

It is requested that the proposed important countryside frontage designation around the boundary of Capital Park is deleted from Policy FUL/01 and from Figures 8 and 9.

It is requested that 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted from Bullet Point No.4 in Policy FUL/01 and from Figures 8 and 9.

All the 'locally' important views', including Ref B2 (Eastwards from Shelford Road towards the south-west village edge) and Ref. C4 (Westwards from Cambridge Road towards the Windmill), could be deleted since they are already contained in the Fulbourn Village Design Statement.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Policy FUL/02: Development outside the Development Framework OBJECT

As set out in the representations to Policy FUL/01, the Green Belt and the Development Framework boundary around Fulbourn are already defined in the adopted South Cambridgeshire Local Plan, and the type and mix of uses permitted in these locations is already defined in development plan policy and national guidance. Policy HQ1 of the adopted Local Plan already adequately deals with design matters, and further guidance is provided in the National Design Guide and in Planning Practice Guidance. The Fulbourn Village Design Guide provides local guidance. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Policy FUL/02 to repeat development plan policies or national and local guidance on development outside village boundaries or design matters. Therefore, Policy FUL/02 is not consistent with national guidance and does not meet Basic Condition (a).

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Policy FUL/03: Creating a Connected Green Infrastructure Network OBJECT

Policy FUL/03 seeks to deliver a green infrastructure network around Fulbourn, and Figure 11 (and Figure 8) identifies the locations for the indicative network. Parts of the land owned by EDBF at south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (adjacent to Fulbourn) is included within the indicative green infrastructure network.

The indicative green infrastructure network designation, as shown on Figure 11 does not correspond to the emerging strategic green infrastructure initiatives identified through the emerging Greater Cambridge Local Plan – see pg. 73 to 80 of Greater Cambridge Green Infrastructure Opportunities Mapping Part 2 Recommendations Report (available at https://consultations.gretercambridgeplanning.org/sites/gcp/files/2021-09/GREATER~3_0.PDF). Strategic Green Infrastructure Initiative No.4: Enhancement of the Eastern Fens is located on the eastern edge of Fulbourn, and includes designated nature conservation sites of Fulbourn Fen SSSI, Great Wilbraham Common SSSI and Wilbraham Fens SSSI. The Part 2 Recommendations Report identifies delivery partners, a strategy and funding for Strategic Green Infrastructure Initiative No.4. The focus for the delivery and funding of green infrastructure projects around Fulbourn will be Strategic Green Infrastructure Initiative No.4 and the designated nature conservation sites managed by local wildlife organisations on the eastern edge of the village. It is not clear how the indicative green infrastructure network identified in Figure 11 and through Policy FUL/03 would be funded or delivered.

Policy FUL/03 refers to development supporting the delivery of the green infrastructure network, including new open space, wildlife areas, biodiversity net gain, and new walking/cycling routes to the countryside. However, there are no allocations for development in Draft FNP that might support the delivery of the indicative green infrastructure network or any biodiversity net gain. In the absence of any allocations for development it is not clear how the indicative green infrastructure network identified in Figure 11 would be delivered. As set out above, Strategic Green Infrastructure Initiative No.4 to be identified as part of the emerging Greater Cambridge Local Plan will be the focus for any funding on the eastern edge of Fulbourn. Any funding for wildlife enhancement through the environmental stewardship scheme or any similar rural initiative is outside the scope of the planning system.

It is not clear whether there has been any discussion or agreement with affected landowners about the delivery of the indicative green infrastructure network on their land. For example there has been no contact with EDBF in respect of the green infrastructure network proposed for their land. It is not clear how the green infrastructure network at the site would be delivered without landowner agreement and in the absence of development.

Therefore, there is no funding or delivery mechanism identified in Draft FNP for the implementation of the indicative green infrastructure network, and in the absence of such a mechanism Policy FUL/03 and Figure 11 should be deleted. It is requested that the indicative green infrastructure network designation for land at south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (adjacent to Fulbourn) in the ownership of EDBF is deleted from Figure 11.

It would be possible to deliver green infrastructure in conjunction with the developments promoted by EDBF as follows: an extension to Capital Park for office and research related employment development; and residential development of

the eastern field at the land south of Cambridge Road adjacent to Fulbourn. This approach to the delivery of green infrastructure is not an option identified or supported in Draft FNP.

Requested Change

It is requested that, in the absence of funding or a delivery mechanism for the implementation of the indicative green infrastructure network, Policy FUL/03 and Figure 11 should be deleted.

The following changes are requested to Figure 11:

The indicative green infrastructure network designation for land at south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (adjacent to Fulbourn) in the ownership of EDBF is deleted.

Section 10: Housing

OBJECT

Section 10 of Draft FNP relates to housing, and Policy FUL/09 relates to housing developments including local housing needs. In summary, Section 10 refers to housing needs data and committed housing developments in Fulbourn. It is noted that despite the current and longstanding need for affordable housing in the village, there are no housing allocations or strategy to deliver housing or affordable housing in Draft FNP.

South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2019) provides the most recent information on local affordable housing needs i.e. those with a local connection to villages in the District, including Fulbourn, Teversham and Great Wilbraham – see <https://www.scambs.gov.uk/media/18316/affordable-housing-housing-statistical-information-leaflet-december-2019.pdf>. The current local housing needs for these three villages is as follows: Fulbourn – 65; Teversham – 21; and Great Wilbraham – 4. The Affordable Housing Needs Survey carried out by ACRE in December 2015 is out of date. The affordable housing needs of Teversham and Great Wilbraham could be met in Fulbourn, since these two villages are referred to in local connection criteria for recent affordable housing planning obligations. The current local affordable housing need should be stated as 90 dwellings. It should be noted that this current need does not consider future needs that are likely to arise during the plan period.

Paragraph 10.3 refers to the number of dwellings to be provided at three existing housing commitments, and it is assumed that affordable housing needs would be met from these developments. However, as set out below, that is not the case. The details of the three committed housing commitments are as follows:

- App Ref. S/3396/17/FL: A rural exception housing scheme off Balsham Road for 14 affordable dwellings. The s106 Agreement includes a planning obligation requiring the affordable housing to be occupied by those that can demonstrate a local connection to Fulbourn. The development is complete.
- App Ref. S/0202/17/OL: An application for 110 dwellings off Teversham Road, with 30% affordable housing which equates to 33 affordable dwellings. The s106 Agreement includes an affordable housing obligation requiring the first 8 affordable dwellings only to be offered to those that can demonstrate a local connection, with the remainder of the affordable housing available for district-wide housing needs.
- S/0670/17/OL: An application for 203 dwellings at the former Ida Darwin Hospital site, with 40% affordable housing which equates to 81 dwellings. The s106 Agreement does not include any obligations specifying that affordable housing must be offered to those with a local connection, and therefore the affordable housing is available for district-wide needs.

Therefore, all the Balsham Road development was available to meet local housing needs, a small proportion of the Teversham Road development will be available for local housing needs, and none of the Ida Darwin Hospital development will be specifically allocated to meet local housing needs. It is acknowledged that those with a local connection to Fulbourn, Teversham and Great Wilbraham might apply for an affordable dwelling at the Teversham Road and Ida Darwin Hospital developments, but it is likely that most affordable dwellings provided at these developments will be allocated to meet district-wide housing needs. The affordable housing needs of 22 households with a local connection to Fulbourn would be met from these three developments, and the affordable housing needs of some others with a local connection would probably also be met, but it is very likely that a substantial proportion of current local housing needs will remain unmet. It is inevitable that additional affordable housing needs will arise soon, from within Fulbourn and across the district.

As set out elsewhere in these representations, there are existing development plan policies and national designations that limit the amount of new housing that can be provided within and on the edge of Fulbourn e.g. Green Belt, Development Frameworks, Conservation Area, Listed Buildings, Local Green Space, Protected Village Amenity Area, Important Countryside Gap etc, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Any rural exception housing scheme is still required to address impacts on Green Belt openness and satisfy all other policy designations, and is reliant on a willing landowner to gift land for this purpose. It is likely that any redevelopment or infill development opportunities within Fulbourn would be small scale and fall below the threshold where affordable housing is required. In these circumstances, it is not clear how, where or when the current identified affordable housing needs of the village will be met, and Draft FNP takes no action to ensure that affordable housing needs are met. It is considered that the problems and consequences associated with not providing enough affordable housing in Fulbourn – as highlighted in Paragraphs 10.18 to 10.20 of Draft FNP - will continue for the foreseeable future.

Paragraph 8 of the NPPF identifies the three strands of sustainable development, and the social objective includes meeting housing needs. Paragraph 15 expects plans to provide a framework for addressing housing needs. Paragraph 60 sets out the Government's objective to boost significantly the supply of housing. Paragraph 62 expects planning policies to reflect the needs for different types of housing including affordable housing. As explained above, the affordable housing needs of Fulbourn are known, but Draft FNP contains no allocations or policies to ensure the delivery of additional affordable housing. Therefore, Section 10 is inconsistent with national guidance and so does not meet Basic Condition (a), and would not achieve sustainable development because affordable housing needs would remain unmet and so does not meet Basic Condition (d).

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify enough land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Policy FUL/13: Large Employment Sites

OBJECT

Policy FUL/13 of Draft FNP relates to large employment sites including Capital Park. EDBF is promoting an extension to Capital Park for office and research related employment through the emerging Greater Cambridge Local Plan process. Policy FUL/13 refers to existing employment policies in the adopted Local Plan and to sustainable travel outcomes for any employment development at the large employment sites. Policy E/13: New Employment Development on the Edges of Villages in the adopted South Cambridgeshire Local Plan already sets out the requirements for new employment development proposed in edge of village locations, including considering impacts on character and appearance and accessibility by walking and cycling. Policy TI/2: Planning for Sustainable Travel of the adopted Local Plan already includes requirements associated with accessibility by sustainable modes of transport and highway impacts for all types of development, including employment. Section 9 of the NPPF provides national policy to promote sustainable transport, including encouraging walking, cycling and public transport, locating development to reduce the need to travel, and avoiding severe impacts on the highway network. Criteria (f) of Paragraph 16 states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". Policy FUL/13 serves no clear purpose, and duplicates existing Policies E/13 and TI/2 of the adopted Local Plan and Section 9 of the NPPF, and as such it is inconsistent with national guidance and so does not meet Basic Condition (a). It is requested that Policy FUL/13 is deleted to avoid repeating adopted development plan policy and national policy.

It is noted that Draft FNP contains no employment allocations, and seeks to add new additional policy designations that are designed to prevent new employment development from coming forward through the emerging Greater Cambridge Local Plan process. The proximity of Fulbourn to the employment in and on the edge of Cambridge provides an opportunity to increase travel by walking, cycling and public transport for journeys to work. There are regular bus services to Cambridge from Fulbourn, and there is a cycle route between Fulbourn and Cambridge. The Greater Cambridge Partnership has proposed a greenway (walking and cycling route) between Fulbourn and Cambridge. The Greater Cambridge Partnership's Making Connections project seeks to improve the frequency of bus services from Fulbourn, including to Cambridge, Cambridge Station, Cambridge Biomedical Campus, and the proposed Cambridge South Station. It is considered that Draft FNP ignores the opportunity to connect housing and employment uses by sustainable modes of transport because it does not support further housing or employment development at Fulbourn. The promoted developments by EDBF at land south of Fulbourn Old Drift (for employment development) and at land south of Cambridge Road (for residential, primary school and community uses etc) could deliver additional improvements to the walking, cycling and public transport infrastructure in these locations to further encourage the use of sustainable modes of transport for travel to work.

Requested Change

It is requested that Policy FUL/13 is deleted to avoid repeating adopted development plan policy.

Policy FUL/14: Community Facilities

OBJECT

Policy FUL/14 allocates land for an extension to the recreation ground, which is identified on Figures 8 and 19. The rationale for seeking an extension to the recreation ground is explained in Paragraph 12.5. It is noted that some improvements to community facilities will be delivered soon via planning obligations from the committed developments at the Ida Darwin Hospital site and at land of Teversham Road. The s106 Agreement for the Ida Darwin Hospital site includes planning obligations relating to open space and play areas to be provided on site, but there are no obligations relating to sport and recreation facilities. The s106 Agreement for the land off Teversham Road development includes a sports space contribution for the refurbishment or extension of the sports pavilion, but no obligations relating to land for sport and recreation facilities. There are no other large scale developments planned or proposed within Fulbourn, and the

Draft FNP makes no allocations where planning obligations could be sought to contribute towards the proposed extension to the recreation ground.

It is not clear from Policy FUL/14 or the supporting text whether there is landowner agreement or funding to enable the delivery of the extension to the recreation ground. There should be some evidence that the land required for the proposed extension to the recreation has been discussed with the landowner and that there is at least an agreement in principle. As set out above, the two major developments in Fulbourn do not make any planning obligations towards the funding of an extension to the recreation ground. If there is no landowner agreement or source of funding to purchase the land and provide the extension to the recreation ground it is unlikely that it would be delivered, and as such will remain an aspiration only.

Paragraph 93 of the NPPF expects planning policies to support the delivery of the social, recreational, and cultural facilities and services the community needs. As set out above, the delivery of the proposed extension to the recreation ground is uncertain. For this reason, Policy FUL/14 is inconsistent with national guidance and so does not meet Basic Condition (a). Therefore, in the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

It should be possible for an extension to the recreation ground to be delivered in conjunction with development in this location, but that is not an option that is put forward in Draft FNP. The land owned by EDBF at south of Cambridge Road could make planning contributions towards sport and recreation facilities in the village if it was allocated for a mixed use development. The promoted development by EDBF at land south of Cambridge Road also includes open space and other green infrastructure, but could also provide land for other facilities if required e.g. allotments. The option of additional development in Fulbourn providing for additional open space, allotments and other community facilities is not identified or considered in Draft FNP.

Requested Change

It is requested that Policy FUL/14 and the supporting text is amended to explain how the proposed extension to the recreation ground will be delivered, including confirmation of landowner agreement and an indication of sources of funding to enable delivery of these facilities. In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

Policy FUL/15: Healthcare Facilities OBJECT

Policy FUL/15 relates to existing and future healthcare facilities in the village, and seeks to support additional health related facilities either on the site of the existing health centre or at another location within the village. Paragraphs 12.7 and 12.8 seeks to explain the rationale for additional health facilities, and refers to enabling residential development to support the delivery of additional facilities. The aspiration for a new health centre for the village has existed for several years.

It is noted that some improvements to community facilities will be delivered soon via planning obligations from the proposed developments at the Ida Darwin Hospital site and at land off Teversham Road. The s106 Agreements for both these developments include planning obligations towards the health services at Cherry Hinton Health Centre, but not for the Fulbourn Health Centre. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations for residential development where planning obligations could be sought to contribute towards additional health facilities.

It is not clear whether any local health service or provider has identified a need for additional or new health facilities in Fulbourn and has a strategy to deliver such a facility; recent planning obligations have been directed to Cherry Hinton Health Centre. It is not clear whether funding is available to support the delivery of the proposed new multi-purpose health centre, either on the existing site or elsewhere within the village. If a new site is required, it is not clear whether land or a suitable site is available. There are no significant previously developed land opportunities available in the village, existing development plan policies and national designations limit development opportunities outside the village boundary e.g. Green Belt and Development Frameworks, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Furthermore, Draft FNP makes no allocations for residential development that might enable the delivery of a multi-purpose health centre. If there is no strategy or mechanism for the provision of a new multi-purpose health centre in the village it is unlikely that it would be delivered, and as such will remain an aspiration only.

Paragraph 93 of the NPPF expects planning policies to support the delivery of community facilities including health facilities and the delivery of health strategies. As set out above, the delivery of the proposed multi-purpose health centre is uncertain. For this reason, Policy FUL/15 is inconsistent with national guidance and so does not meet Basic Condition (a). Therefore, in the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, including land for a new building or land for enabling residential development, it is requested that Policy FUL/15 is deleted.

Draft FNP does not consider the option of a multi-purpose health centre being delivered in conjunction with additional residential development. For example, if allocated for residential development the land owned by EDBF south of Cambridge Road could make planning contributions towards additional health facilities in the village, or could provide

land for a multi-purpose health centre in conjunction with the promoted mixed use development and local centre for the site.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Change suggested by respondent:

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection, to support and not prevent additional employment development, and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, to achieve Planning Objectives No.4, No.5 and No.6.

Requested Change

The following changes are requested to Figure 8.

The proposed 'important visual gap' designation is deleted.

The 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted.

All the 'locally' important views' could be deleted since they are already contained in the Fulbourn Village Design Statement.

The proposed important countryside frontage designation at Capital Park is deleted.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that the proposed 'important visual gap' designation is deleted from Policy FUL/01 and from Figures 8 and 9.

It is requested that the proposed important countryside frontage designation around the boundary of Capital Park is deleted from Policy FUL/01 and from Figures 8 and 9.

It is requested that 'locally important view' at Ref. B3 (Eastwards from Cambridge Road towards the Windmill) is deleted from Bullet Point No.4 in Policy FUL/01 and from Figures 8 and 9.

All the 'locally' important views', including Ref B2 (Eastwards from Shelford Road towards the south-west village edge) and Ref. C4 (Westwards from Cambridge Road towards the Windmill), could be deleted since they are already contained in the Fulbourn Village Design Statement.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Requested Change

It is requested that, in the absence of funding or a delivery mechanism for the implementation of the indicative green infrastructure network, Policy FUL/03 and Figure 11 should be deleted.

The following changes are requested to Figure 11:

The indicative green infrastructure network designation for land at south of Fulbourn Old Drift (adjacent to Capital Park) and land south of Cambridge Road (adjacent to Fulbourn) in the ownership of EDBF is deleted.

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify enough land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Requested Change

It is requested that Policy FUL/13 is deleted to avoid repeating adopted development plan policy.

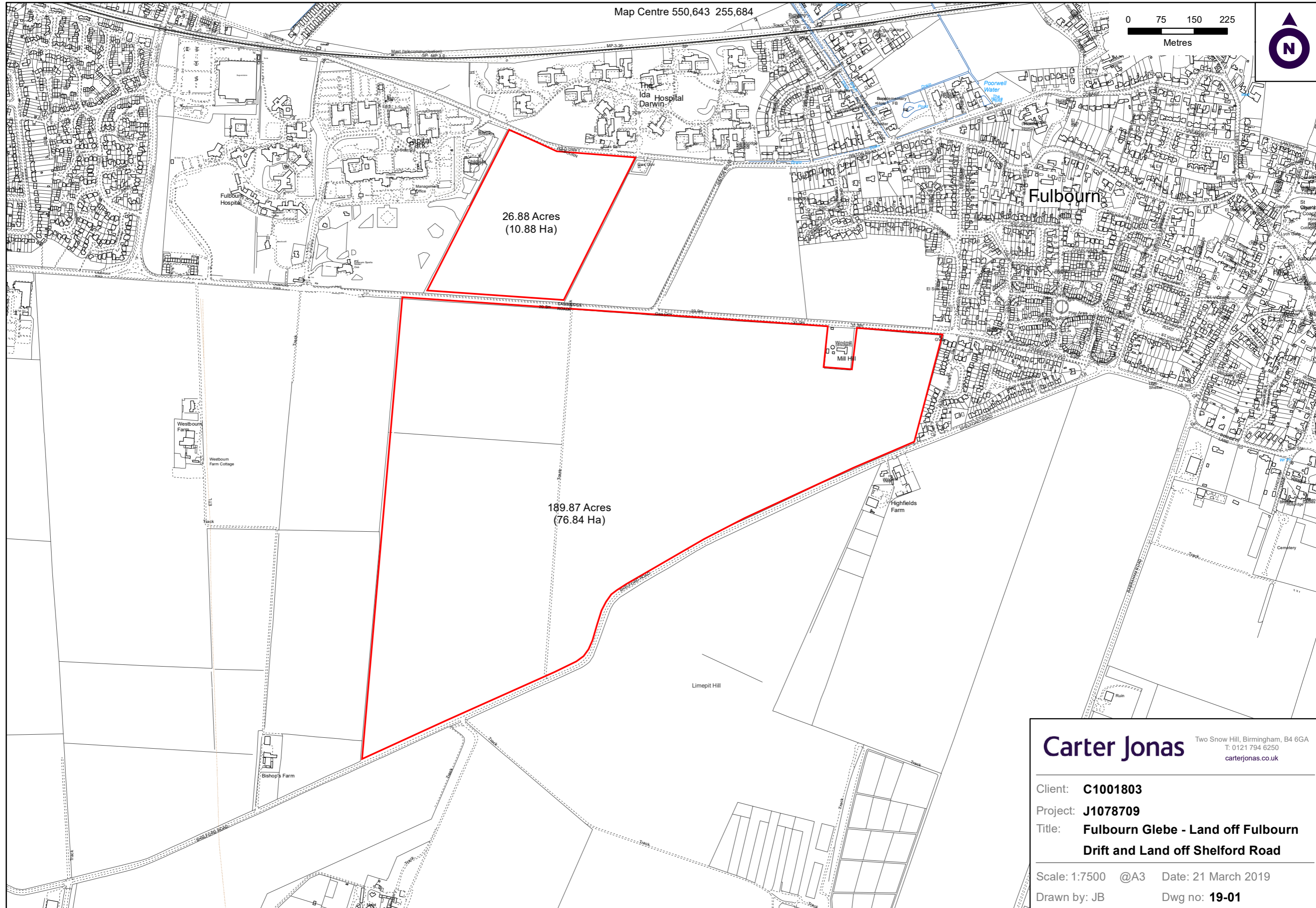
Requested Change

It is requested that Policy FUL/14 and the supporting text is amended to explain how the proposed extension to the recreation ground will be delivered, including confirmation of landowner agreement and an indication of sources of funding to enable delivery of these facilities. In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Attachments: Site Location Plan - EDBF Land at Fulbourn.pdf - <https://cambridge.oc2.uk/a/3v5sr>



Carter Jonas

Two Snow Hill, Birmingham, B4 6GA
T: 0121 794 6250
carterjonas.co.uk

Client: **C1001803**

Project: **J1078709**

Title: **Fulbourn Glebe - Land off Fulbourn
Drift and Land off Shelford Road**

Scale: 1:7500 @A3 Date: 21 March 2019

Drawn by: JB Dwg no: **19-01**

59334

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Environment Agency**Date received:** 30/12/2021 via Email**Summary:**

Policies FUL/03 and FUL/04

Generally supportive of the content of policies FUL/03 'Creating a connected GI network' and FUL/04 'Protection and enhancement of natural environment.'

The Fulbourn Neighbourhood Plan area although mostly at low risk of fluvial flooding, does have some areas of Flood Zone 2 and 3 (medium and high risk of flooding from watercourses/rivers) along the drains and at the top of the boundary of the area adjacent to Bottisham/Quy/Wilbraham main river. The area also has sensitivity in terms of groundwater, there are chalk formations forming the bedrock and a groundwater Source Protection Zone. Therefore policy FUL/04 could have included some local principles around avoiding and managing flood risk and protecting water quality whether surface water or groundwater. We appreciate there may be limited scope to incorporate amendments at this stage and there is also opportunities to incorporate the necessary policy principles and requirements within the emerging Greater Cambridge Local Plan, which will also be of benefit to this area.

Full text:

Thank you for notifying us of the consultation above.

We are generally supportive of the content of policies FUL/03 'Creating a connected GI network' and FUL/04 'Protection and enhancement of natural environment.'

The Fulbourn Neighbourhood Plan area although mostly at low risk of fluvial flooding, does have some areas of Flood Zone 2 and 3 (medium and high risk of flooding from watercourses/rivers) along the drains and at the top of the boundary of the area adjacent to Bottisham/Quy/Wilbraham main river. The area also has sensitivity in terms of groundwater, there are chalk formations forming the bedrock and a groundwater Source Protection Zone. Therefore policy FUL/04 could have included some local principles around avoiding and managing flood risk and protecting water quality whether surface water or groundwater. We appreciate there may be limited scope to incorporate amendments at this stage and there is also opportunities to incorporate the necessary policy principles and requirements within the emerging GC Local Plan, which will also be of benefit to this area.

We have no further comments.

Change suggested by respondent:

-

Attachments: None

59333

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version

Respondent: Hill Residential

Agent: Carter Jonas

Date received: 17/01/2022 via Web

Summary:**Full text:**

REPRESENTATIONS TO REG.16 DRAFT SUBMISSION FULBOURN NEIGHBOURHOOD PLAN

Planning Objectives
OBJECT

Paragraph 5.6 of the Draft Submission Fulbourn Neighbourhood Plan (Draft FNP) identifies the planning objectives for the document. There are two planning objectives that are relevant to these representations for Hill Residential, which are as follows: 4. Have a mix of housing that is affordable, available, and suitable for all ages and appropriate to the village location; and 6. Improve amenities and community facilities.

As highlighted in the representations to Section 10: Housing, Draft FNP does not allocate any land for housing development, and the outstanding housing commitments for major development (at the Ida Darwin Hospital and land off Teversham Road sites) already define affordable housing obligations with only a small proportion specifically directed to those with a local connection to Fulbourn. As such, Draft FNP would have no influence on the delivery of affordable housing in Fulbourn because decisions about housing and affordable housing within the village have already been taken. Draft FNP does not seek to address the current identified needs for affordable housing for those with a local connection or the concerns raised by residents and employers about housing affordability. It is considered that Planning Objective No.4 is ineffective because affordable housing needs for those with a local connection will remain unmet during the plan period to 2031.

As highlighted in the representations to Policies FUL/14: Community Facilities and FUL/15: Healthcare Facilities, it is not clear whether there is landowner agreement for the proposed extension to the recreation ground, how or where the proposed new multi-purpose health centre would be provided, or where the community aspiration for additional allotments would be located. It is noted that the housing commitments at the Ida Darwin Hospital and land off Teversham Road sites already define planning obligations for health and community facilities, and include health service funding for Cherry Hinton Health Centre. Draft FNP contains no strategy to ensure the delivery or funding of these community facilities during the plan period to 2031, and as such Planning Objective No.6 is ineffective because the amenities and community facilities in the village would not be improved. Draft FNP ignores the fact that new recreation, health, and community facilities are typically delivered in conjunction with new development or funded in part by planning obligations derived from new development, but does not consider this approach to deliver new or improved facilities.

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, to achieve Planning Objectives No.4 and No.6.

Figure 8: Neighbourhood Plan Policy Map Summary
OBJECT

Hill Residential owns the land east of Balsham Road in Fulbourn. A site location plan is enclosed with these representations. A part of this site is identified for a proposed extension to the recreation ground in Policy FUL/14 of Draft FNP. The land off Balsham Road has been promoted through the emerging Greater Cambridge Local Plan by Hill Residential for residential development including an extension to the recreation ground,

As set out in the representations to Policy FUL/14, the planning obligations for local sport and recreation facilities from the two committed housing developments in Fulbourn (at the Ida Darwin Hospital site and at land off Teversham Road) are already specified in the respective s106 Agreements, and do not relate to an extension of the recreation ground. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations where planning obligations could be sought to contribute towards the proposed extension to the recreation ground. It is not explained how the proposed extension to the recreation ground would be delivered or funded in the absence of new development, and as such must be uncertain. There is no information provided in Policy FUL/14 and associated supporting text or any evidence document about the site selection process for the proposed extension to the recreation ground or details of discussions with the affected landowner, Hill Residential. There should be some evidence provided with Draft FNP that the land required for the proposed extension to the recreation has been discussed with the landowner and that there is at least an agreement in principle, but that is not the case. Therefore, the site selection and

consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance. For these reasons, and as requested in Hill Residential's representations to Policy FUL/14, the site allocation for the proposed extension to the recreation ground should be deleted from Figures 8 and 19 and Policy FUL/14.

The option of funding and delivering an extension to the recreation ground with residential development was not considered or assessed in Draft FNP. It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

Requested Change

In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Figures 8 and 19 and Policy FUL/14.

The site selection and consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance, and in these circumstances, it is requested that this site allocation is deleted from Figures 8 and 19 and Policy FUL/14.

It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

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

OBJECT

Policy FUL/01 seeks to protect the setting of Fulbourn, and refers to the rural setting of locally important views and the openness and appearance of fields. It also refers to the guidance provided in the Fulbourn Village Design Guide.

It is noted that the Green Belt and the Development Framework boundaries in the adopted South Cambridgeshire Local Plan 2018 already limits the extent of development around the village, and severely restrict the possibility of any major new development coming forward in the future other than existing commitments which already have planning permission. The designated village amenity areas, local green space and important countryside frontage designations in the adopted Local Plan identify areas within the Development Framework boundary of the village where additional development of all types is prevented. It is considered that Policy FUL/01 and Draft FNP seeks to identify additional policy designations around all parts of the village to prevent any major development from coming forward or being allocated through the emerging Greater Cambridge Local Plan process.

Bullet Point No.5 of Policy FUL/01 seeks to avoid adverse impacts on the openness and appearance of fields that contribute to the setting of the 'locally important views'. Hill Residential owns land east of Balsham Road, which could fall within the setting of the proposed 'locally important view' Ref. C8 (South eastwards from Home End across the Recreation Ground). There are two matters of concern with the proposed 'locally important view' Ref. C8, firstly there is no evidence to support such a designation in this location, and secondly this designation replicates development plan policy and national guidance that already controls development in this location.

Evidence Paper 1: Key Village Views, prepared to support Draft FNP, claims to provide the evidence for the 'locally important views' designation. However, it is noted that there are no photographs or illustrative material provided in Evidence Paper 1 to show those important views or to highlight their particular importance. The 'view' from off Home End and 'locally important view' Ref. C8 is of buildings, a paddock, a car park, and a sport and recreation ground including cricket and football pitches, a skateboard park, bowling green, tennis courts, and multi-use games area, an equipped play area, and a sports pavilion building. The 'view' from this location is dominated by the sport and recreation facilities, and there are no landmarks or features that make this 'view' particularly important to justify special protection. The land east of Balsham Road, owned by Hill Residential, is not visible from Home End because of the existing mature trees and hedgerows at the site boundary, which in any event would be retained as part of the promoted development. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that "It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence". In the absence of any evidence the proposed 'locally important view' designation at Ref. C8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that the 'locally important views' designation from off Home End (Ref. C8) is deleted from Policy FUL/01 and from Figures 8 and 9.

The adopted South Cambridgeshire Local Plan 2018 includes policies on the Green Belt (Policy S/4) and Development Frameworks (Policy S/7). The adopted Policies Map defines the boundaries for both these designations. Policy S/4 refers to national Green Belt policy, which is set out in Section 13 of the NPPF. The principles of openness, preventing unrestricted sprawl and the coalescence of settlements, safeguarding the countryside from encroachment, and protecting the setting of settlements is already established in national Green Belt policy – see Paragraphs 137 and 138. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Bullet Point No.5 of Policy FUL/01 to repeat development plan and national guidance on openness of the Green Belt or development plan policies restricting development outside village boundaries. Therefore, Policy FUL/01 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that references to openness

and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

Bullet Point No.6 refers to the Fulbourn Village Design Guide. The Guide is adopted as a supplementary planning document, and provides design guidance for the village in the context of Policy HQ1: Design Principles of the adopted South Cambridgeshire Local Plan. Therefore, any development proposals in Fulbourn would already be assessed against Policy HQ1 and the guidance in the Fulbourn Village Design Guide. Criteria (f) of Paragraph 16 of the NPPF seeks to avoid the duplication of policies, and therefore it is not necessary for Bullet Point No.6 of Policy FUL/01 to repeat existing development plan policy and adopted guidance, and does not meet Basic Condition (a). It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6. Furthermore, the Fulbourn Village Design Guide was not informed by any landscape or visual evidence, and some of the terminology used in the document to describe parcels of land is not explained or robust. For example, Figure 17 of the Guide identifies the land off Home End as 'fields with sensitive visual relationship with the village' and as a 'key outwards views from the village'. As set out above, the land off Home End is surrounded by buildings and a car park with sport and recreation facilities beyond, and as such the site is not sensitive and it has limited physical or visual relationship with the countryside and does not represent a 'key' outward view from the village. Therefore, the Fulbourn Village Design Guide does not provide the evidence to explain or justify the designations referred to in Policy FUL/01.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that the 'locally important views' designation at land off Home End (Ref. C8) is deleted from Bullet Point No.4 and from Figures 8 and 9.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Policy FUL/02: Development outside the Development Framework OBJECT

As set out in the representations to Policy FUL/01, the Green Belt and the Development Framework boundary around Fulbourn are already defined in the adopted South Cambridgeshire Local Plan, and the type and mix of uses permitted in these locations is already defined in development plan policy and national guidance. Policy HQ1 of the adopted Local Plan already adequately deals with design matters, and further guidance is provided in the National Design Guide and in Planning Practice Guidance. The Fulbourn Village Design Guide provides local guidance. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Policy FUL/02 to repeat development plan policies or national and local guidance on development outside village boundaries or design matters. Therefore, Policy FUL/02 is not consistent with national guidance and does not meet Basic Condition (a).

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Policy FUL/04: Protection and Enhancement of Natural Features OBJECT

Policy FUL/04 seeks to protect and enhance natural features. However, the adopted South Cambridgeshire Local Plan already contains policies relating to drainage, design, landscape character, and the natural environment; see for example Policy CC/8: Sustainable Drainage Systems; Policy HQ/1: Design Principles; Policy NH/2: Protecting and Enhancing Landscape Character; Policy NH/4: Biodiversity; Policy NH/5: Sites of Biodiversity or Geological Importance; Policy NH/6: Green Infrastructure; and Policy NH/7: Ancient Woodlands and Veteran Trees. Section 12 of the NPPF sets out national policy on design, and the National Design Guide and in Planning Practice Guidance provide further guidance on design matters. Section 14 of the NPPF includes national policy on flood risk and drainage matters. Section 15 of the NPPF sets out national policy to protect and enhance the natural environment.

Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Policy FUL/04 to repeat development plan policies and national guidance on drainage, design, landscape character, and natural environment related matters, and to do so does not meet Basic Condition (a). It is requested that Policy FUL/04 is deleted or revised.

Requested Change

It is requested that Policy FUL/04 is deleted or revised.

Policy FUL/07. Building and Landscape Design & Policy FUL/11: Housing Design Quality OBJECT

Policy FUL/07 contains detailed design policy, which includes details relating to building heights, parking, and cycling arrangements, waste collection facilities, materials, and landscaping. Policy FUL/11 contains additional design policies for housing.

Policy HQ1 of the adopted South Cambridgeshire Local Plan already adequately deals with design matters relating to site context, materials, car parking, cycle parking, waste collection facilities, and landscaping. Policy H/8 of the Local Plan indicates an average net density of 30 dwellings per hectare for Minor Rural Centres, but subject to local circumstances. Policy CC/3 of the Local Plan sets requirements to reduce carbon emissions and the use of renewable energy. The adopted Fulbourn Village Design Guide already provides local design guidance. The adopted Greater Cambridge Sustainable Design and Construction SPD provides further guidance on carbon reduction, water conservation, and energy use for residential developments. There is further design guidance provided in the National Design Guide and in Planning Practice Guidance.

Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. It is not necessary for Policy FUL/07 and Policy FUL/11 to repeat development plan policies and national or local guidance on design matters. Therefore, Policy FUL/07 and Policy FUL/11 are not consistent with national guidance and does not meet Basic Condition (a), and as such should be deleted.

Requested Change

It is requested that Policy FUL/07 and Policy FUL/11 are deleted.

Section 10: Housing OBJECT

Section 10 of Draft FNP relates to housing, and Policy FUL/09 relates to housing developments including local housing needs. In summary, Section 10 refers to housing needs data and committed housing developments in Fulbourn. It is noted that despite the current and longstanding need for affordable housing in the village, there are no housing allocations or strategy to deliver housing or affordable housing in Draft FNP.

South Cambridgeshire District Council’s ‘Housing Statistical Information Leaflet’ (December 2019) provides the most recent information on local affordable housing needs i.e. those with a local connection to villages in the District, including Fulbourn, Teversham and Great Wilbraham – see <https://www.scambs.gov.uk/media/18316/affordable-housing-housing-statistical-information-leaflet-december-2019.pdf>. The current, immediate, local housing needs for these three villages is as follows: Fulbourn – 65; Teversham – 21; and Great Wilbraham – 4. The Affordable Housing Needs Survey carried out by ACRE in December 2015 is out of date. The affordable housing needs of Teversham and Great Wilbraham could be met in Fulbourn, since these two villages are referred to in local connection criteria for recent affordable housing planning obligations. The current local affordable housing need should be stated as 90 dwellings. It should be noted that this current need does not consider future needs that are likely to arise during the plan period and these also need to be planned for.

Paragraph 10.3 refers to the number of dwellings to be provided at three existing housing commitments, and it is assumed that affordable housing needs would be met from these developments. However, as set out below, that is not the case. The details of the three committed housing commitments are as follows:

- App Ref. S/3396/17/FL: A rural exception housing scheme off Balsham Road for 14 affordable dwellings. The s106 Agreement includes a planning obligation requiring the affordable housing to be occupied by those that can demonstrate a local connection to Fulbourn. The development was completed in 2019, occupied by households with a local connection, and contributed towards reducing the affordable housing needs of the village.
- App Ref. S/0202/17/OL: An application for 110 dwellings off Teversham Road, with 30% affordable housing which equates to 33 affordable dwellings. The s106 Agreement includes an affordable housing obligation requiring the first 8 affordable dwellings only to be offered to those that can demonstrate a local connection, with the remainder of the affordable housing available for district-wide housing needs.
- S/0670/17/OL: An application for 203 dwellings at the former Ida Darwin Hospital site, with 40% affordable housing which equates to 81 dwellings. The s106 Agreement does not include any obligations specifying that affordable housing must be offered to those with a local connection, and therefore the affordable housing is available for district-wide needs.

Therefore, the Balsham Road site is occupied so is no longer available for local households in affordable housing need, a small proportion of the Teversham Road development is available for current local housing needs, and none of the Ida Darwin Hospital development will be specifically allocated to meet local housing needs. It is acknowledged that those

with a local connection to Fulbourn, Teversham and Great Wilbraham might apply for an affordable dwelling at the Teversham Road and Ida Darwin Hospital developments, but it is likely that most affordable dwellings provided at these developments will be allocated to meet district-wide housing needs. The affordable housing needs of 8 households with a local connection to Fulbourn would be met from these two developments, and the affordable housing needs of some others with a local connection might also be met, but it is very likely that a substantial proportion of current local housing needs will remain unmet. It is inevitable that additional affordable housing needs will arise soon, from within Fulbourn, Teversham and Great Wilbraham and across the district. A fundamental role of the FNP must be to plan for those affordable housing needs to be met.

As set out elsewhere in these representations, there are existing development plan policies and national designations that limit the amount of new housing that can be provided within and on the edge of Fulbourn e.g. Green Belt, Development Frameworks, Conservation Area, Listed Buildings, Local Green Space, Protected Village Amenity Area, Important Countryside Gap etc, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Any rural exception housing scheme is still required to address impacts on Green Belt openness and satisfy all other policy designations, and is reliant on a willing landowner to gift land for this purpose. It is likely that any redevelopment or infill development opportunities within Fulbourn would be small scale and fall below the threshold where affordable housing is required. In these circumstances, it is not clear how, where or when the current identified affordable housing needs of the village will be met, and Draft FNP takes no action to ensure that affordable housing needs are met. It is considered that the problems and consequences associated with not providing enough affordable housing in Fulbourn – as highlighted in Paragraphs 10.18 to 10.20 of Draft FNP - will continue for the foreseeable future.

Paragraph 8 of the NPPF identifies the three strands of sustainable development, and the social objective includes meeting housing needs. Paragraph 15 expects plans to provide a framework for addressing housing needs. Paragraph 60 sets out the Government's objective to boost significantly the supply of housing. Paragraph 62 expects planning policies to reflect the needs for different types of housing including affordable housing. As explained above, the affordable housing needs of Fulbourn are known, but Draft FNP contains no allocations or policies to ensure the delivery of additional affordable housing. Therefore, Section 10 is inconsistent with national guidance and so does not meet Basic Condition (a), and would not achieve sustainable development because affordable housing needs would remain unmet and so does not meet Basic Condition (d).

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify enough land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Policy FUL/14: Community Facilities

OBJECT

Policy FUL/14 allocates land for an extension to the recreation ground, which is identified on Figures 8 and 19. The rationale for seeking an extension to the recreation ground is explained in Paragraph 12.5. Hill Residential own the land for the proposed extension to the recreation ground.

Firstly, it is noted that some improvements to community facilities will be delivered soon via planning obligations from the committed developments at the Ida Darwin Hospital site and at land of Teversham Road. The s106 Agreement for the Ida Darwin Hospital site includes planning obligations relating to open space and play areas to be provided on site, but there are no obligations relating to sport and recreation facilities. The s106 Agreement for the land off Teversham Road development includes a sports space contribution for the refurbishment or extension of the sports pavilion, but no obligations relating to land for sport and recreation facilities. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations where planning obligations could be sought to contribute towards the proposed extension to the recreation ground. Policy FUL/14 does not explain how the proposed extension to the recreation ground would be delivered or funded in the absence of new development. Paragraph 93 of the NPPF expects planning policies to support the delivery of the social, recreational, and cultural facilities and services the community needs. The delivery of the proposed extension to the recreation ground must be uncertain in the absence of a delivery mechanism. For this reason, Policy FUL/14 is inconsistent with national guidance and so does not meet Basic Condition (a). In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

Secondly, there is no information provided in Policy FUL/14 and associated supporting text or any evidence document about the site selection process for the proposed extension to the recreation ground or details of discussions with the affected landowner. Paragraph 042 (Ref ID: 41) of the Planning Practice Guidance allows a neighbourhood plan to allocate sites for development, but it also states that "A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria". Paragraph 048 deals with consultation requirements for neighbourhood plans, and states in part that "...Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies

will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development". There should be some evidence provided with Draft FNP that the land required for the proposed extension to the recreation has been discussed with the landowner and that there is at least an agreement in principle, but that is not the case. Therefore, the site selection and consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance, and so do not meet Basic Condition (a). In these circumstances, it is requested that the site allocation for the proposed extension to the recreation ground is deleted from Policy FUL/14 and from Figures 8 and 19.

Hill Residential owns the land for the proposed extension to the recreation ground. Hill Residential's call for sites submission and representations to the emerging Greater Cambridge Local Plan process did propose an extension to the recreation ground in conjunction with residential development. The option of funding and delivering an extension to the recreation ground with residential development was not considered or assessed in Draft FNP.

It is very likely that the proposed extension to the recreation ground will remain an undelivered aspiration without landowner support or a planning obligation from associated residential development. It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

Requested Change

In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

The site selection and consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance, and in these circumstances, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

Policy FUL/15: Healthcare Facilities

OBJECT

Policy FUL/15 relates to existing and future healthcare facilities in the village, and seeks to support additional health related facilities either on the site of the existing health centre or at another location within the village. Paragraphs 12.7 and 12.8 seeks to explain the rationale for additional health facilities, and refers to enabling residential development to support the delivery of additional facilities. The aspiration for a new health centre for the village has existed for several years.

It is noted that some improvements to community facilities will be delivered soon via planning obligations from the proposed developments at the Ida Darwin Hospital site and at land off Teversham Road. The s106 Agreements for both these developments include planning obligations towards the health services at Cherry Hinton Health Centre, but not for the Fulbourn Health Centre. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations for residential development where planning obligations could be sought to contribute towards additional health facilities.

It is not clear whether any local health service or provider has identified a need for additional or new health facilities in Fulbourn and has a strategy to deliver such a facility; recent planning obligations have been directed to Cherry Hinton Health Centre. It is not clear whether funding is available to support the delivery of the proposed new multi-purpose health centre, either on the existing site or elsewhere within the village. If a new site is required, it is not clear whether land or a suitable site is available. There are no significant previously developed land opportunities available in the village, existing development plan policies and national designations limit development opportunities outside the village boundary e.g. Green Belt and Development Frameworks, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Furthermore, Draft FNP makes no allocations for residential development that might enable the delivery of a multi-purpose health centre. If there is no strategy or mechanism for the provision of a new multi-purpose health centre in the village it is unlikely that it would be delivered, and as such will remain an aspiration only.

Paragraph 93 of the NPPF expects planning policies to support the delivery of community facilities including health facilities and the delivery of health strategies. As set out above, the delivery of the proposed multi-purpose health centre is uncertain. For this reason, Policy FUL/15 is inconsistent with national guidance and so does not meet Basic Condition (a). Therefore, in the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, including land for a new building or land for enabling residential development, it is requested that Policy FUL/15 is deleted.

Draft FNP does not consider the option of a multi-purpose health centre being delivered in conjunction with additional residential development. For example, if allocated for residential development the land owned by Hill Residential to the east of Balsham Road could make planning contributions towards additional health facilities in the village.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Change suggested by respondent:

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, to achieve Planning Objectives No.4 and No.6.

Requested Change

In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Figures 8 and 19 and Policy FUL/14.

The site selection and consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance, and in these circumstances, it is requested that this site allocation is deleted from Figures 8 and 19 and Policy FUL/14.

It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that the 'locally important views' designation at land off Home End (Ref. C8) is deleted from Bullet Point No.4 and from Figures 8 and 9.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Requested Change

It is requested that Policy FUL/04 is deleted or revised.

Requested Change

It is requested that Policy FUL/07 and Policy FUL/11 are deleted.

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify enough land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Requested Change

In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

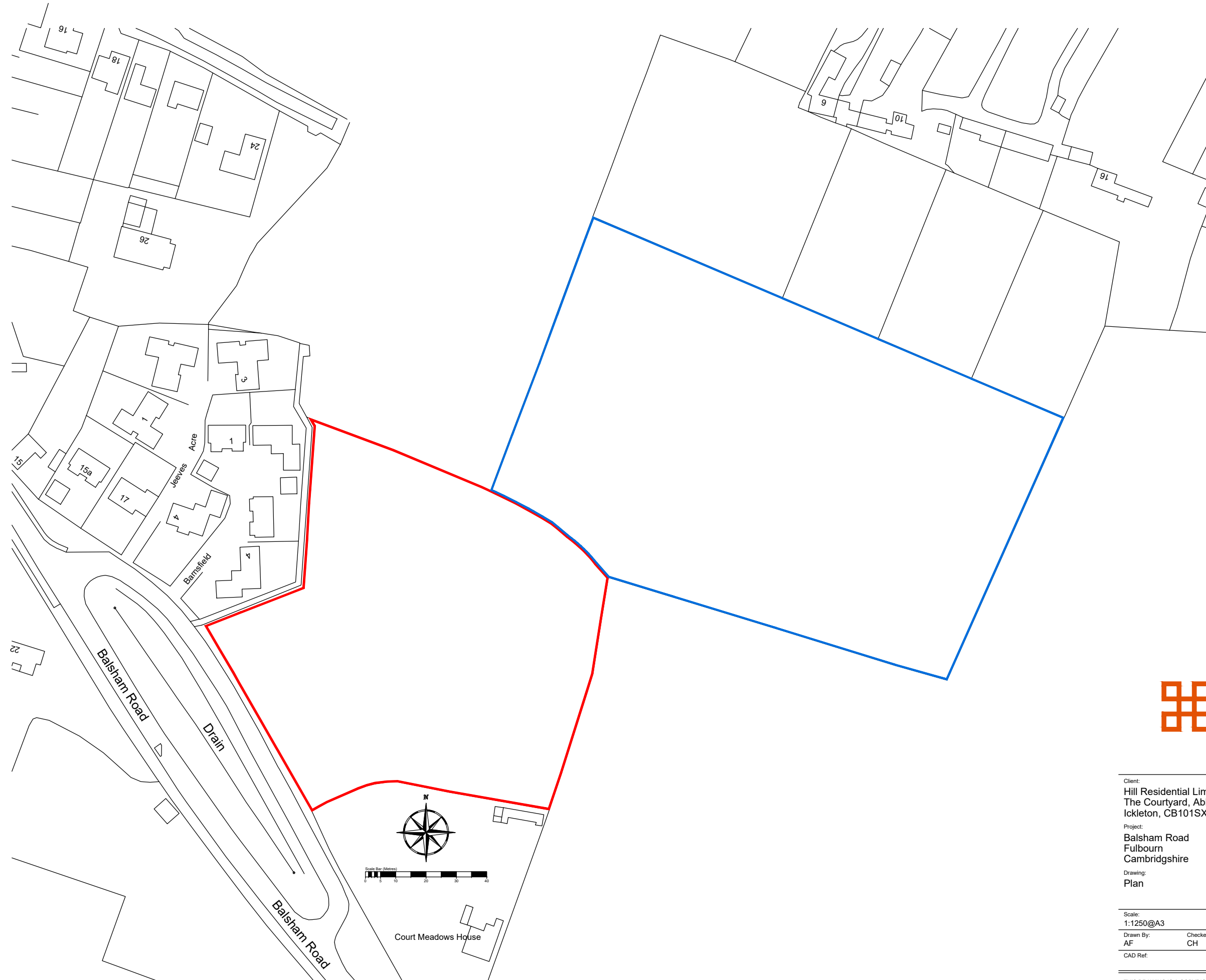
The site selection and consultation processes for the proposed allocation for an extension to the recreation ground were not consistent with national guidance, and in these circumstances, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

It is requested that the proposed extension to the recreation ground is discussed with Hill Residential to explore how it could be delivered, including in conjunction with residential development.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Attachments: 2019-03-22 - Site Location Plan - Balsham Road.PDF - <https://cambridge.oc2.uk/a/3v5s3>



Client:
Hill Residential Limited
 The Courtyard, Abbey Barns,
 Ickleton, CB101SX

Project:
Balsham Road
 Fulbourn
 Cambridgeshire

Drawing:
Plan

Scale: 1:1250@A3 Date: March 2019

Drawn By: AF Checked By: CH Drawing No: 070-TP-001 Rev. No: ---

CAD Ref: ---

59332

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Historic England**Date received:** 09/12/2021 via Email**Summary:**

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

Full text:

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Change suggested by respondent:

-

Attachments: Response Form - <https://cambridge.oc2.uk/a/3v5sj>



Historic England

Jonathan Dixon

Direct Dial: [REDACTED]

Planning Policy Manager

Greater Cambridge Shared Planning

Our ref: PL00733942

By Email

9 December 2021

Dear Mr Dixon,

Ref: Fulbourn Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

Edward James
Historic Places Advisor, East of England



cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

59376

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Mr Corey Isolda**Date received:** 17/01/2022 via Email**Summary:**

FUL/01 Protecting the distinctiveness and landscape setting of Fulbourn
FUL/02 Development outside the Development Framework

The Important Countryside Frontage designation of the Land at Station Road site should be removed, as its small southern frontage is not considered as benefiting the local community or character of the village. It would be better served by being allocated for housing in the SDNP which would give the local community the ability to play a significant role in shaping its appearance.

Full text:

-

Change suggested by respondent:

-

Attachments: Response form - <https://cambridge.oc2.uk/a/3v5sf>
Response form - <https://cambridge.oc2.uk/a/3v5sg>

Fulbourn Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713000 or neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 18 January 2022.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scams.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Fulbourn Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**



The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Fulbourn Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	Corey Isolda	Agent's name:	
Name of organisation: (if applicable)	Countryside Properties	Name of Agent's organisation: (if applicable)	
Address:	Countryside House, The Drive, Brentwood	Agent's Address:	
Postcode:	CM13 3AT	Postcode:	
Email:		Email:	
Telephone:		Telephone:	
Signature:		Date:	13/01/21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response**What part of the Neighbourhood Plan do you have comments on?**

Policy or Paragraph Number (please state)	FUL/01. - Protecting the Distinctiveness and Landscape Setting of Fulbourn FUL/02. - Development outside the Development Framework
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input type="checkbox"/> Comment

Reason for Support, Object or Comment:

Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph

If you consider that the referendum boundary should be extended, please outline your reasons.

Please see attached PDF document

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

The Important Countryside Frontage designation of the Land at Station Road site should be removed, as its small southern frontage is not considered as benefiting the local community or character of the village. It would be better served by being allocated for housing in the SDNP which would give the local community the ability to play a significant role in shaping its appearance.

Completed forms must be received by 5pm on 18 January 2022 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA



COUNTRYSIDE

Places People Love

Countryside Properties Response to Fulbourn Neighbourhood Plan Policies FUL/01 'Protecting the Distinctiveness and Landscape Setting of Fulbourn' and FUL/02. 'Development outside the Development Framework'

Policy FUL/01 of the Submission Draft Neighbourhood Plan (SDNP) identifies key protected views from the village and important countryside frontages. Figure 9 (Visual relationship of the village with the countryside and Cambridge) in the SDNP shows the Station Road site as containing two key view corridors out of the village (1 in north-east corner from Station Road; and 2 from the Church of St Vigor's IV from the south). Figure 9 also identifies part of the southern boundary, fronting Langthorn Stile and Barleyfields as an 'Important Countryside Frontage' C7 (Northwards from Church Lane through Lanthorn Stile).

The field subject to the designation, known as the 'Station Road site' is flat arable field that is surrounded on three sides by housing development and bound to the north by a railway line with a thick screening of evergreen trees.

Policy FUL/01 is intended to define Important Countryside Frontages:

"In accordance with Local Plan Policy NH/13 where land with a strong countryside character provides a significant connection between the village and surrounding rural area or an important rural break between parts of the development framework. Planning permission for development will be refused if it would compromise these purposes."

Policy NH/13 of the adopted Local plan states that

"1. Important Countryside Frontages are defined where land with a strong countryside character either:

- a. Penetrates or sweeps into the built-up area providing a significant connection between the street scene and the surrounding rural area; or
- b. Provides an important rural break between two nearby but detached parts of a development framework"

The site is an arable field, with perimeter trees mainly on the northern boundary with the railway line and garden boundaries backing on to the site on three sides. The site does not '*Penetrate or sweep into the built-up area providing a significant connection between the street scene and the surrounding rural area*' as it is surrounded by built form and either residential frontage or gardens and is enclosed by private boundary fences and hedgerow.

It is also difficult to suggest that the southern edge of the field '*Provides an important rural break between two nearby but detached parts of a development framework*', as the majority of the allocated frontage is taken up by hedgerows or fences, and is allocated within private land made up of Langthorn Stile and the rear gardens of homes within The Chantry.



COUNTRYSIDE

Places People Love

In this context, therefore, it would be difficult to argue the site is an important countryside frontage or has a strong countryside character to comply with policy NH/13. Such designation should be saved for sites which make a meaningful contribution to the special character and setting of the village.

In addition the Important Countryside Frontage designation has not been informed by any relevant landscape assessment. The SDNP refers to a key evidence paper '002 - Village Setting : Important Countryside Frontages' however this only contains a three paragraph justification for the allocation of the Important Countryside Frontage and does not offer any real assessment of the landscape character, merely stating that the field separates the gardens of Station Road and Aphorne Street. The document also states that the allocation would provide open views to the Countryside. It seems contradictory to suggest that land surround on three sides by residential development with an elevated railway line and heavy tree screening on the remaining edge can provide an open outlook into and from the village.

The Vision Document submitted by Countryside as part of the Call for Sites provides a landscape appraisal of the site. Accounting for the high degree of visual enclosure within the site, the impact of the development will be largely confined to effect on views from surrounding residential properties. The Vision document states that the Landscape Institute has published a draft methodology for assessing the impact of development on residential amenity (February 2018) and concludes that careful consideration should be given as to "whether or not the development is 'dominant', 'overwhelming'; and/or 'inescapably present' and as such causes the property to become 'widely regarded ', an 'undesirable place to live'". As such there is no robust justification for the designation of the site as a 'sensitive field' given its context being contained by urban form.

In terms of the key views out of the village, the outward view from the Church to the south is a narrow corridor view that can only be glimpsed. Nevertheless, as shown on the illustrative masterplan in the VD, should development come forward on the site there would be an opportunity to frame this corridor view with landscaping to draw the eye towards the site. The key view from the north-east corner of the site from Station Road is provided due to a break between the houses to the south and railway to the north. This view of the field is partially screened by existing vegetation but again, it provides a fleeting view for passer-by. The view is only appreciated by those travelling south along Station Road traveling from the Wilbrahams. The view is not visible from the main routes into and out of the village unlike the other sensitive field designations.

The illustrative masterplan has been sensitively designed to minimise localised impacts and fully integrate the urban form with the surroundings. There is also an opportunity to reserve land adjacent to the northern boundary of the site along the railway line, future proofing delivery of a railway station for Fulbourn. This could also provide a location for a pedestrian bridge over the railway line.

Therefore, the Important Countryside Frontage designation of the Land at Station Road site should be removed, as it is not considered to be a sensitive field for the purposes of benefiting the local community or character of the village. It would be better served by being allocated for housing in the SDNP which would give the local community the ability to play a significant role in shaping its appearance.

The SDNP has the ability to allocate the entirety of the Station Road site for residential development and shape it in a way that would bring significant community benefit to the local residents.

59371

Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** Janus Henderson Property UK PAIF**Agent:** Miss Catrin Stephens**Date received:** 18/01/2022 via Web**Summary:**

Representations on behalf of landowner of Land south of Capital Park, Fulbourn.

Review of neighbourhood plan against guidance in the NPPF and NPPG and the basic conditions as set out in planning legislation.

In particular making objections to -

1. Policy FUL/01 Protecting the Distinctiveness and Landscape Setting of Fulbourn
2. Policy FUL/05 Local Green Space and Protected Village Amenity Areas.

Please see attached supporting documents.

Full text:

Please see attached supporting documents.

Change suggested by respondent:

Please see attached supporting documents.

Attachments: Draft Representations on Fulbourn Neighbourhood Plan.pdf - <https://cambridge.oc2.uk/a/3v5t4>

**LAND SOUTH OF
CAPITAL PARK,
FULBOURN
REPRESENTATIONS TO
THE FULBOURN
NEIGHBOURHOOD
PLAN**

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SITE LOCATION PLAN		

Quality Assurance

Site name: Land south of Capital Park, Fulbourn
Client name: Janus Henderson Property UK PAIF
Type of report: Representations to the Fulbourn Neighbourhood Plan

Prepared by: Alison Wright MRTPI

Signed 

Date 17.01.2022

Reviewed by: Mike Derbyshire MRTPI

Signed 

Date 17.01.2022

1.0 Introduction

- 1.1 These representations have been prepared by Bidwells LLP on behalf of Janus Henderson Property UK PAIF who own Land south of Capital Park, Fulbourn (“the Site”) and in response to the Fulbourn Neighbourhood Plan Submission Draft and its associated evidence base. A site location plan is included at **Appendix 1**.
- 1.2 Within the Fulbourn Neighbourhood Plan the Site is referred to as ‘Victoria House Parkland’.
- 1.3 The representations include a review of the Neighbourhood Plan policies against guidance in the National Planning Policy Framework (NPPF) and Guidance (NPPG) and the ‘basic conditions’ at paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.
- 1.4 In particular, these representations respond and **object** to the following policies by virtue of the following proposed designations of the Site (referred to as ‘Victoria House Parkland’);
- **Policy FUL/01**. Protecting the Distinctiveness and Landscape Setting of Fulbourn
 - Important Visual Gap designation
 - Important Countryside Frontage designation
 - **Policy FUL/05**. Local Green Space and Protected Village Amenity Areas
 - Local Green Space designation

The Site

- 1.5 Land south of Capital Park, Fulbourn extends to circa 2.2 hectares and comprises land immediately to the south of the main Capital Park campus and to the east of part of the Fulbourn and Ida Darwin Hospital site.
- 1.6 The Site is bound by existing roads to the north, south and west with the eastern boundary currently open. The site comprises two buildings in the north western corner, the Yews and The Firs, both of which are currently unoccupied. The rest of the site comprises vacant grassland with mature landscaping at the northern, western and southern edges.
- 1.7 To the north of the Site lies the main Capital Park site, which is accessed via Cambridge Road and comprises four large three storey office buildings, the old hospital building, a daycare nursery and cafe.
- 1.8 To the east of the Site lies further grassland which runs to the edge of the field boundary and which is formed by an established tree belt.
- 1.9 To the west of the site is the former Fulbourn Social Club site which is a single storey building surrounded by a large parking court. Planning permission was granted in November 2018 for the demolition of the Fulbourn Social Club and construction of a new 72-bed care home with associated car and cycle parking, landscaping and access from The Drive (under reference S/3418/17/FUL). A subsequent Section 73 Minor Material Amendment application was approved

in June 2021 to amend the approved plans, vehicle access and parking and turning areas (under reference 20/05143/S73).

- 1.10 To the south of the site lies Cambridge Road beyond which is open countryside.



Figure 1 : Site Location Plan

- 1.11 The site is well served by existing transport links, is ideally located to utilise the existing connectivity within and around the high quality business park and is close to the existing Tesco superstore. The site is situated within close access to 'Citi 1', 'Citi 3' and '16A' bus services which are within a reasonable walking distance of the site. There are also a number of strategic schemes coming forward which will improve mobility in the area, including the Fulbourn 'Greenway' which is expected to be routed approximately 100m to the north.

2.0 Planning Policy Context

Basic Conditions

2.1 For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the ‘basic conditions’ set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the national Planning Practice Guidance (PPG).

2.2 Only conditions a, and d-g apply to a Neighbourhood Development Plan (conditions b and c relate to Neighbourhood Development Orders only). These are:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).

(d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

(e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

National Planning Policy Framework (NPPF) and Guidance (NPPG)

2.3 Paragraph 29 of the NPPF relates to non-strategic policies. It states;

Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those policies. Footnote 16 to paragraph 29 states: Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

2.4 The PPG adds at paragraph 040 (Reference ID 41-040-20160211) that;

“...proportionate, robust evidence should support the choices made and the approach taken” by a Neighbourhood Plan and in respect of their preparation, states that: “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.” [Reference ID: 41-041-20140306].

- 2.5 The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by “*proportionate evidence...on how the draft neighbourhood plan or order guides development to sustainable solutions*” (paragraph 072 Reference ID: 41-072-20190509).

Local Green Space

- 2.6 Paragraphs 99-101 of the NPPF relate to open space and recreation. Para 99 states;
“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.”

- 2.7 Para 100 and 101 state;

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

- 2.8 The PPG adds that;

“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making¹.

Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented².

¹ Paragraph: 007 Reference ID: 37-007-20140306

² Paragraph: 008 Reference ID: 37-008-20140306

Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city³.

If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

One potential benefit in areas where protection from development is the norm (e.g. villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community⁴.

- 2.9 The PPG provides advice on the types of space that can be identified as Local Green Space. It says:

The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis⁵.

There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name⁶.

South Cambridgeshire Local Plan (2018)

- 2.10 In order to meet basic condition (e), the draft DNP must be in general conformity with the “...strategic policies contained in the Development Plan...”.
- 2.11 The Development Plan comprises the South Cambridgeshire Local Plan adopted in 2018.
- 2.12 Policy S/6 : The Development Strategy to 2036 confirms that the need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge Green Belt:
- a. On the edge of Cambridge;
 - b. At new settlements;
 - c. In the rural area at Rural Centres and Minor Rural Centres.

³ Paragraph: 009 Reference ID: 37-009-20140306

⁴ Paragraph: 010 Reference ID: 37-010-20140306

⁵ Paragraph: 013 Reference ID: 37-013-20140306

⁶ Paragraph: 015 Reference ID: 37-015-20140306

Representations to the Fulbourn Neighbourhood Plan – Land south of Capital Park, Fulbourn

- 2.13 The site is immediately adjoining the Fulbourn and Ida Darwin Hospital allocation under the existing adopted South Cambridgeshire District Council Local Plan (Policy H/3: Fulbourn and Ida Darwin Hospitals).
- 2.14 The site is within the Fulbourn Hospital Conservation Area and is in proximity to a number of non-designated heritage assets.
- 2.15 The Site is currently washed over by the Green Belt.

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

3.1 Policy FUL/01. Protecting the Distinctiveness and Landscape Setting of Fulbourn states;

1. Development will only be permitted where it respects and retains or enhances the setting and special character of Fulbourn as an individual village set in a rural landscape. Any development proposals must be located and designed so that they do not have an adverse effect on the rural character and openness of the landscape setting.

2. Development will not be permitted which would encroach on or reduce the current dominant green aspect of the Important Visual Gap between Fulbourn and the boundary of the urban area of Cambridge and neighbouring Villages. Proposals will be required to demonstrate how visual encroachment and urbanisation, including light and noise pollution, of the Important Visual Gap has been minimised.

3. Important Countryside Frontages are defined in accordance with Local Plan Policy NH/13 where land with a strong countryside character provides a significant connection between the village and surrounding rural area or an important rural break between parts of the development framework. Planning permission for development will be refused if it would compromise these purposes.

4. Locally Important Views are identified in Fig. 9 and comprise:

Long Distance Views

A1-Northwards from the Roman Road by Wandlebury

A2-Westwards from Balsham Road towards the Windmill

A3-South-eastwards from Teversham Road towards the village

A4-Northwards from the high ground on Shelford Road

Views Towards the Village

B1-North-westwards from the public bridleway towards Station Road

B2-Eastwards from Shelford Road towards the south-west village edge

B3-Eastwards from Cambridge Road towards the Windmill

B4-South-eastwards from Fulbourn Old Drift towards the Windmill

Outward Views from the Village

C1-Eastwards from the corner of Church Lane and Station Road

C2-Southwards from the junction of Cambridge Road and School Lane C3-Southwards from the junction of Cambridge Road and Haggis Gap

C4-Westwards from Cambridge Road towards the Windmill C5-Northwards from the Ida Darwin site

C6-Northwards from Poor Well

C7-Northwards from Church Lane through Lanthorn Stile

C8-South-eastwards from Home End across the Recreation Ground

5. Development will not be permitted where it would have an adverse impact on the rural setting of Locally Important Views or result in the loss of woodland or the openness and appearance of fields which contribute to the setting of the Locally Important Views.

6. Development proposals will be required to demonstrate compliance with the Fulbourn Village Design Guide and any document that supersedes this.”

3.2 Policy NH/13: Important Countryside Frontage of the South Cambridgeshire Local Plan (2018) states;

1. Important Countryside Frontages are defined where land with a strong countryside character either:

a. Penetrates or sweeps into the built-up area providing a significant connection between the street scene and the surrounding rural area; or

b. Provides an important rural break between two nearby but detached parts of a development framework.

2. Planning permission for development will be refused if it would compromise these purposes.

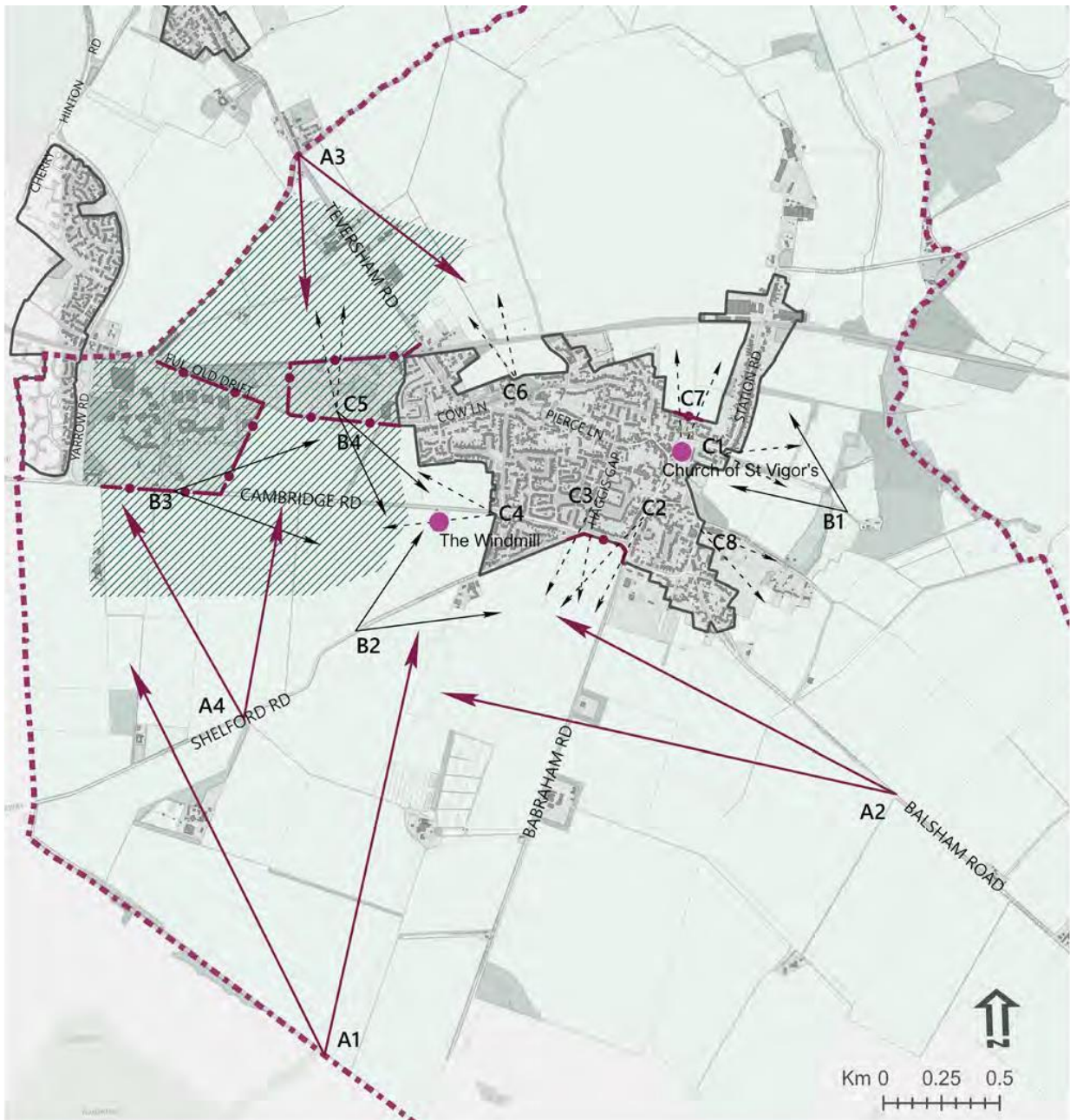
3.3 The supporting text to Policy NH/13 states, at paragraph 6.42;

“In many places land with a strong countryside character penetrates or sweeps into South Cambridgeshire’s villages or separates two parts of the built-up area. Such land enhances the setting, character and appearance of the village by retaining the sense of connection between the village and its rural origins and surroundings. The frontage where this interface particularly occurs is identified to indicate that the frontage and the open countryside beyond should be kept open and free from development. In most cases it is land which adjoins the village built-up area but in some cases it separates two parts of the village and the open intervening land therefore assumes an importance for the character of the village as a whole.”

3.4 The proposed ‘Important Visual Gap’, ‘Important Countryside Frontage’ and ‘Locally Important Views’ are then identified on Figure 9 of the Neighbourhood Plan (see extract below – Figure 2).

Important Visual Gap

3.5 The glossary of the Fulbourn Neighbourhood Plan defines ‘Important Visual Gap’ as ‘*Special designation of the Fulbourn Neighbourhood Plan to identify a tract of land within the Green Belt which is essential to visually separate Fulbourn from Cambridge, even though it contains buildings. The visual gap in this case is not established by fields and countryside, but by sensitive low density development hidden among trees*’.



- Designated Neighbourhood Area
- Development Framework
- Important Visual Gap (Pol. FUL/01)
- Local landmarks
- Important Countryside Frontage (Pol. FUL/01)
- Locally Important Views (Pol. FUL/01)
- Key Long Distance View
- Key View towards the Village
- Key Outward View from the Village

Figure 2 : Figure 9 of the Fulbourn Neighbourhood Plan. Visual Relationship of the village with the countryside and Cambridge

- 3.6 Land at Capital Park is already protected by Green Belt policy and the Fulbourn Hospital Conservation Area. It is not clear from the evidence what additional local benefit would be gained by a further designation as an Important Visual Gap. The existing Green Belt designation already seeks to assist in safeguarding the countryside from encroachment. Furthermore, the NPPF confirms, at paragraph 133, that the essential characteristics of Green Belts are their openness and their permanence. Planning Practice Guidance states that Green Belt openness is capable of having both spatial and visual aspects (emphasis added) – in other words, the visual impact of a proposal may be relevant, as could its volume⁷.
- 3.7 This confirms that existing Green Belt policy provides sufficient protection against proposals that fail to conserve and protect the land, without the need for the additional layer of designation proposed by Policy FUL/01.
- 3.8 Furthermore, Land at Capital Park itself is not considered to be essential to visually separate Fulbourn from Cambridge. Rather, the consistent and dense tree belt on its southern and eastern boundaries provides the visual barrier. As long as this strong landscape boundary is maintained then sufficient visual separation between the settlements would be preserved.
- 3.9 The PPG indicates that “*proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn on to explain succinctly the intention and rationale of the policies.*” In this case, the evidence provided is not considered sufficiently robust to justify the approach taken, which is overly restrictive. Policy FUL/01 is not therefore in accordance with national planning guidance on the making of a NP.
- 3.10 As such, it is suggested that Policy FUL/01 is amended to remove Capital Park from the Important Visual Gap designation.

Important Countryside Frontage

- 3.11 Evidence Paper 2. Village Setting : Important Countryside Frontages states that;
- “The Capital Park ICF is very significant for Fulbourn in maintaining the essential Green Belt separation between the village and the outer extent of Cambridge. These last fields are crucial in safeguarding the community’s long held wish to remain a separate settlement, distinct from the City. It also secures important views of the Windmill, an iconic structure for the village and the title of its monthly magazine.”*
- 3.12 However, it is the consistent and dense tree belt on Capital Park’s southern and eastern boundary that, as a strong landscape feature forerunning the open arable fields between the village and the outer extent of Cambridge provides visual relief between the urban centres. Therefore, the Capital Park site itself does not contribute to a sense of visual openness between Fulbourn and Cambridge due to its own urban nature.

⁷ Paragraph: 001 Reference ID: 64-001-20190722

- 3.13 In terms of views towards the Windmill, the view along Cambridge Road, travelling eastwards towards Fulbourn, is framed by the tree belts on both sides of the road. The view opens up to reveal the Windmill to the east of Capital Park, but the Capital Park site itself does not interfere with views of the Windmill
- 3.14 Therefore, the Important Countryside Frontage policy for Capital Park is not considered to be sufficiently justified to be useful in informing future development in the area. As such, it is suggested that Policy FUL/01 is amended to delete the Capital Park Important Countryside Frontage.

Locally Important Views

- 3.15 With reference to both View A1 and View A4 (long distance views) and View B3 (Views Towards the Village), it should be noted that the tree cover within the Victoria Parkland site and on its boundaries provides substantial visual enclosure to the extent that views of Victoria House are limited and only seen from public vantage points over a dense layer of trees (MARTINA CHECK). The consistent and dense tree belt on the site's southern boundary is evidenced in Figure 7.
- 3.16 The existing urban elements within the Capital Park Site are screened by the tree cover and proposed development within the Victoria Parkland site, carefully located, would afford the same level of screening preventing visual encroachment of the countryside. The Victoria House landmark would also be preserved.

4.0 Policy FUL/05. Local Green Space and Protected Village Amenity Areas

4.1 Policy FUL/05. Local Green Space and Protected Village Amenity Areas states;

1. The following sites are locally significant and designated as a Local Green Spaces in accordance with Local Plan Policy NH/12 (identified in Fig. 13 / Fig. 14). Inappropriate development as defined in the NPPF would not be approved except in very special circumstances and in discussion with the local community:

- a. Pound Green*
- b. Victoria House Parkland*
- c. Fulbourn Hospital Parkland*
- d. Fulbourn Hospital Old Cemetery*

2. The following sites are designated as Protected Village Amenity Areas in accordance with Local Plan Policy NH/11 (identified in Fig. 13). Development will not be permitted within or adjacent to these areas if it would have an adverse impact on the character, amenity, tranquillity or function of the village:

- e. Saint Vigor's Road Green Space*
- f. The Swifts Green Space*
- g. The Haven Green Space*
- h. Caraway Road/Bird Farm Road Green Space*
- i. Cherry Orchard Green Space*
- j. Huntsmill Green Space*
- k. Almshouses Lawn*
- l. Manor Walk Greens*
- m. Home End Green*

4.2 Policy NH/12: Local Green Space of the adopted South Cambridgeshire Local Plan states;

"Local Green Space identified on the Policies Map will be protected from development that would adversely impact on the character and particular local significance placed on such green areas which make them valued by their local community. Inappropriate development, as defined in the National Planning Policy Framework, would not be approved except in very special circumstances and in discussion with the local community."

4.3 The supporting text to Policy NH/12 states, at paragraph 6.41 of the Local Plan;

"The NPPF (2012) has created a designation called Local Green Space (LGS), which is for green areas of particular importance to local communities which once designated can prevent new development other than in very special circumstances. Local communities and parish councils in the district have helped the Council to identify the sites that are demonstrably special to their

local community. A LGS must hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. The green area must be in reasonably close proximity to the community it serves. It must be local in character and not be an extensive tract of land. These sites can protect land outside of a development framework. A list of Local Green Space is provided in Appendix C.”

4.4 The proposed Local Green Space designations are then identified in Figure 14 of the Fulbourn Neighbourhood Plan (see extract below – Figure 3).

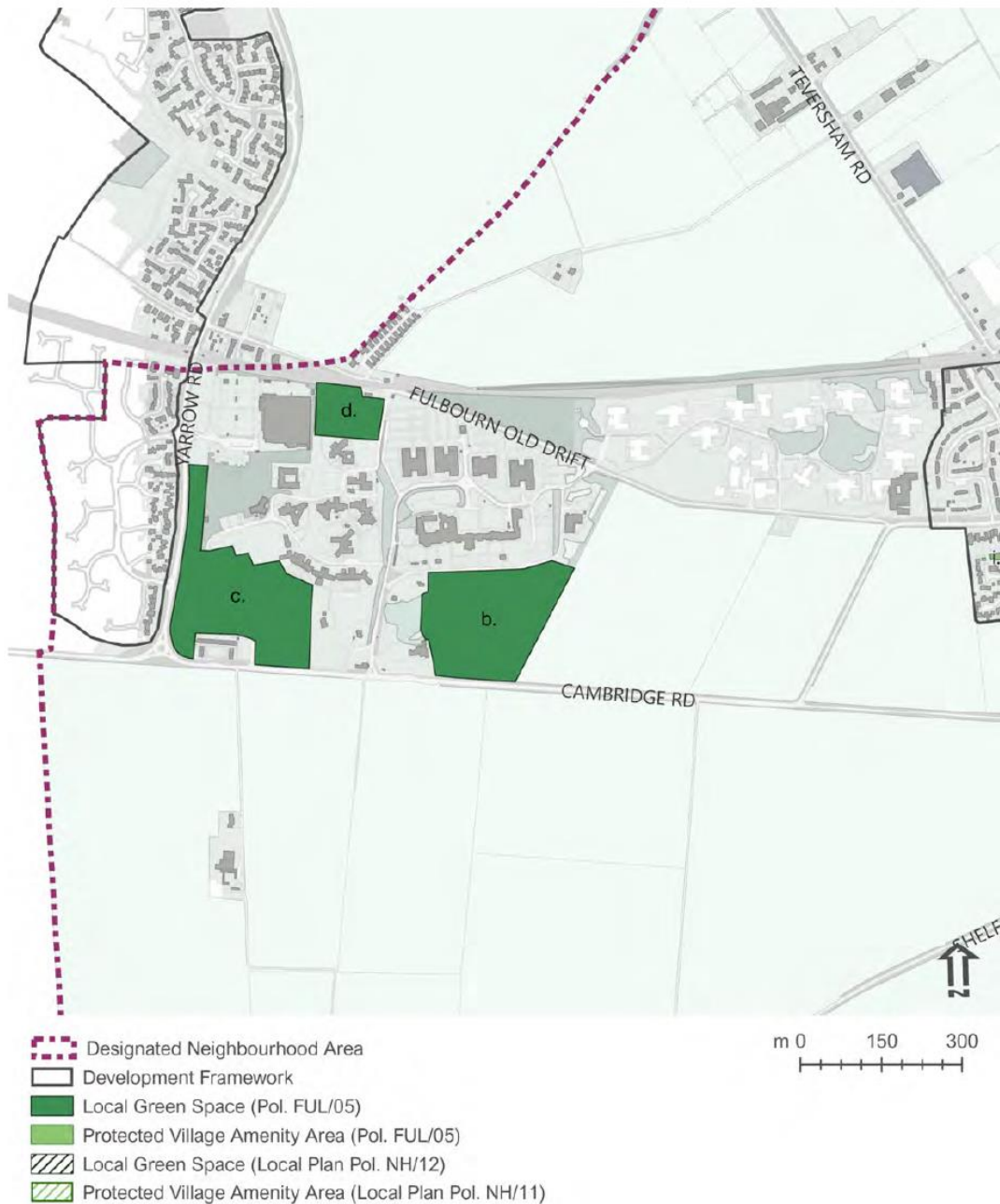


Figure 3 : Figure 14 of the Fulbourn Neighbourhood Plan. Designated Green Spaces outside the Development Framework

- 4.5 Evidence Paper 3 : Local Green Spaces has been prepared to support Policy FUL/05. With reference to the Site ('Victoria House Parkland') an assessment has been prepared using the following headings;
- History and Legal Status
 - Cultural, Recreational and Community Value
 - Ecological Value

- 4.6 Using these headings, we assess the Neighbourhood Plan's basis for designating the Site.

History and Legal Status

- 4.7 In December 1992 Fulbourn Hospital, including the parkland setting around the original asylum buildings and the modern hospital was designated a conservation area. The assessment within Evidence Paper 3 states that '*Victoria House Parkland is an important constituent part of the Fulbourn Hospital Conservation Area as described in the Conservation Appraisal 2021. Its mix of open grassland, specimen trees and hedgerows complements the distinctive architecture of Victoria House and also provides a key open green space between the urban spread of Cambridge via Cherry Hinton, and Fulbourn as a separate village*'.
- 4.8 However, the grounds to the south of the former Fulbourn Hospital were not historically in use as an open parkland setting to the building. In fact, they were largely in agricultural use for crops. The aerial at Figure 4 (dating to the early 20th century) shows the petal-shaped layout also illustrated on historic maps of the period. The area was used for planting different crops, with grassland immediately in front of the hospital.
- 4.9 During the World Wars, this petal arrangement was completely removed, and the area used for extensively for agricultural purposes. This also saw the grassland area reduced in size to a smaller rectangular section, as shown in the later aerial – see Figure 5 below.
- 4.10 More recently, the reduced area of 'garden' associated with the hospital has been constrained into defined, formal areas contained within hedge and tree planting – in areas close to the hospital buildings themselves (see Figure 6) .
- 4.11 It is evident therefore that the whole area proposed for allocation as "green space" was not historically usable garden or parkland space associated with the hospital building. A much smaller element of the proposed parcel did act in that specific role, but the vast majority provided a functional, agricultural purpose and was used for growing crops, vegetables and fruit.
- 4.12 The historic evidence demonstrates that the area of land to the south of the hospital has not been wholly used as some sort of 'parkland' associated with it. In fact, these areas have transitioned through different uses – with the agricultural uses precluding public access.
- 4.13 Whilst there is a measure of setting-contribution performed by this area in relation to the former Hospital building, the scale and elevation of the buildings themselves assure their evident landmarking role, and this does not rely on the land in question remaining as open green space in its use.

- 4.14 Furthermore, Victoria House Parkland is already protected by Green Belt policy and the Fulbourn Hospital Conservation Area. It is not clear from the evidence what additional local benefit would be gained by a further designation as Local Green Space.
- 4.15 As such, the green space is not considered to hold a particular local historical significance sufficient to justify a further designation over and above the existing protection secured by the Green Belt and Conservation Area designation.

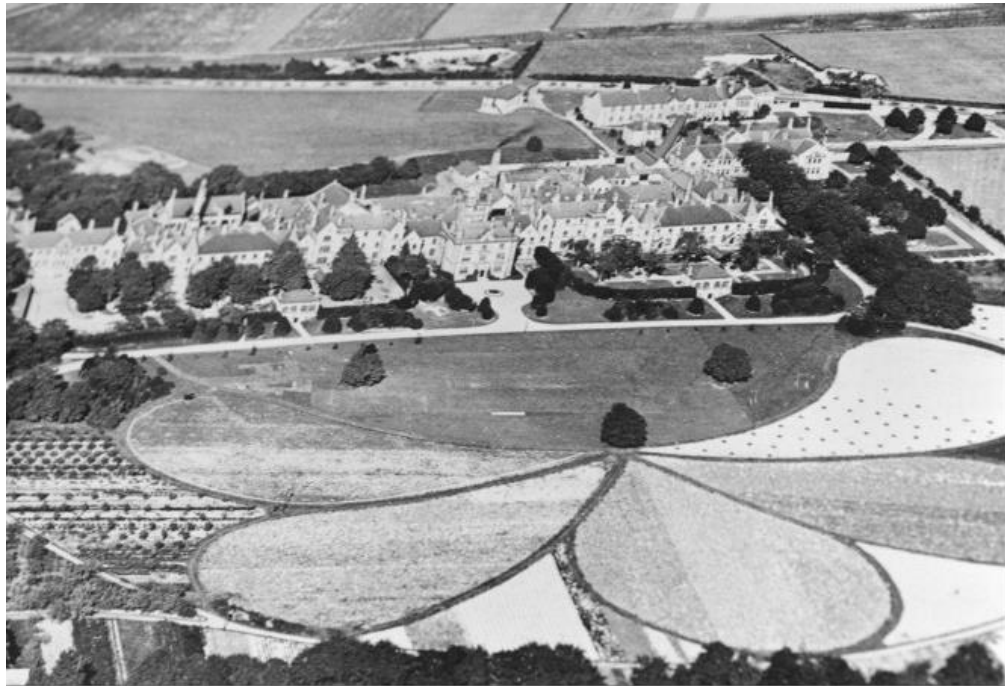


Figure 4 – 1927 aerial image



Figure 5 – mid 20th century aerial



Figure 6 - 2022 aerial showing modern gardens

Cultural, Recreational and Community Value

4.16 The assessment within Evidence Paper 3 states;

“Due to restrictions applied by the current owners and the use of the site for an NHS facility and as a high-tech business park public access is discouraged. The parkland does however lie within easy reach of the Fulbourn residential areas of the main village and also the Beechwoods estate to the west and is informally used as a recreational resource. In the years prior to the change of ownership the social club was active with frequent football matches between local village teams taking place.

Several seating benches are located across the area.”

4.17 The Site not publicly accessible nor the subject of permissive access rights. It also does not provide connection between Fulbourn and Cambridge, a public bridleway is located to the north of Capital Park. There is therefore no robust evidence to confirm that the site holds a particular local significance in terms of its recreational value. It is inappropriate to use a neighbourhood plan to try to allocate land in this manner, it is private land in the hands of a commercial company. No attempts have been made to contact the landowner to discuss this option, but for the avoidance of doubt, the land owner is not willing to set this land aside for recreational use or provide public access to it.

4.18 In terms of cultural and/or community value, the assessment within Evidence Paper 3 states;

“Victoria House is identified in the Conservation Area Appraisal (2021) as a 'Positive Building', one with significant heritage status for Fulbourn.

The main road linking Fulbourn to Cherry Hinton & Cambridge runs along the southern boundary and views of Victoria House and the parklands in front of it are seen by drivers, pedestrians and cyclists as they travel this route. A distinctive Fulbourn vista is seen from Shelford Road that runs along the Gogs Magog ridge on the opposite side of the valley.

Victoria House, and its associated buildings, are of a distinctive Victorian architectural style and the front elevation is best seen from the Victoria House Parkland that lies directly in front of it. The image of Victoria House is one of the distinctive views associated with Fulbourn.”

4.19 Commentary on the local historical significant of the Site has been provided above.

4.20 In terms of views of Victoria House and the parklands in front of it, the tree cover within the Victoria Parkland site and on its boundaries in fact provides substantial visual enclosure to the extent that views of Victoria House are limited and only seen from public vantage points over a dense layer of trees. The consistent and dense tree belt on the site’s southern boundary is evidenced in Figure 7 below.



Figure 7 : Tree belt on the site's southern boundary to the left of the view taken along Cambridge Road (Google Earth source)

4.21 In terms of the ‘distinctive Fulbourn vista’ seen from Shelford Road, the Victoria House tower represents a distinctive landmark within the local views as it emerges over a dense layer of trees. However, again, the tree cover within the site and on its boundaries contrasts the surrounding rural openness and provides substantial visual enclosure, as shown in Figure 8. The existing urban elements within Capital Park are screened by the tree cover and proposed development within the Victoria Parkland site, carefully located, would afford the same level of screening

preventing visual encroachment of the countryside. The Victoria House landmark would also be preserved.



Figure 8 : View from Shelford Road replicating view A4 in Fulbourn NP Policy FUL/01 (Google Earth source)

- 4.22 There is therefore no robust evidence to confirm that the site holds a particular local significance in terms of its cultural and/or community value.

Ecological Value

- 4.23 The assessment within Evidence Paper 3 refers to the main open park grassland providing foraging opportunities for birds and the tree belt along the eastern and southern boundary providing habitat for potentially large numbers of invertebrates which can in turn provide food for birds and foraging bats. The assessment also refers to ‘green links’ between Victoria House Parkland and the wider Capital Park and Fulbourn Hospital site.
- 4.24 Any significant wildlife value is likely to be limited to the site boundaries only which could be easily retained in any future development proposal for the site.
- 4.25 In the absence of any evidence that the Site presents significant wildlife value contributing to it holding a particular local significance, it should not be designated as Local Green Space on basis of the tranquillity or richness of its wildlife.

Summary

- 4.26 There is no robust evidence as to how the additional layer of designation proposed by the Neighbourhood Plan would provide local benefit, contrary to the requirements of Planning Practice Guidance⁸.
- 4.27 Victoria House Parkland should therefore not be designated as a Local Green Space.

⁸ Paragraph: 013 Reference ID: 37-013-20140306

5.0 Summary and Conclusions

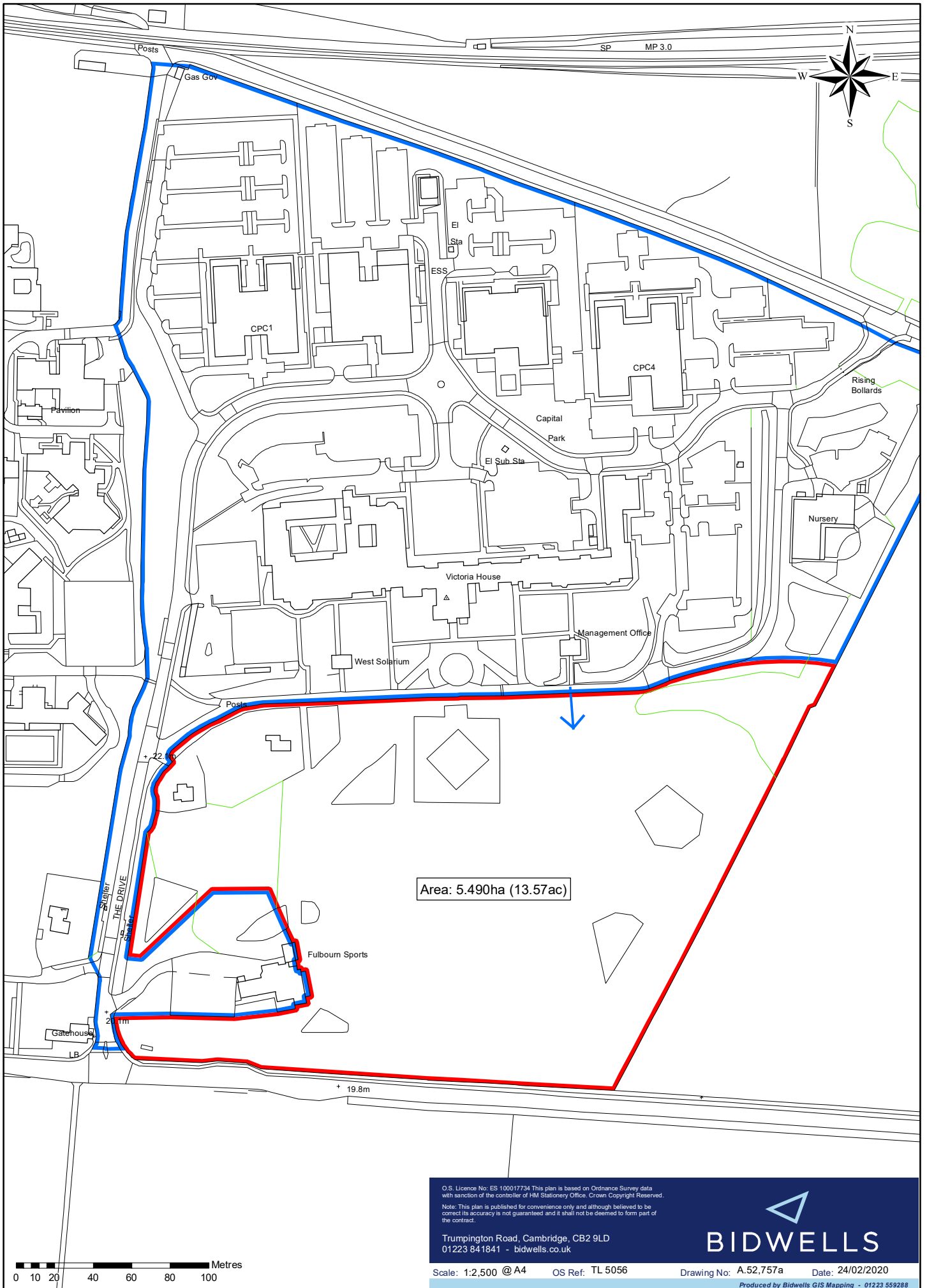
- 5.1 These representations have been prepared by Bidwells LLP on behalf of Janus Henderson Property UK PAIF who own Land south of Capital Park, Fulbourn (“the Site”) and in response to the Fulbourn Neighbourhood Plan Submission Draft and its associated evidence base.
- 5.2 Within the Fulbourn Neighbourhood Plan the Site is referred to as ‘Victoria House Parkland’.
- 5.3 The representations include a review of the Neighbourhood Plan policies against guidance in the National Planning Policy Framework (NPPF) and Guidance (NPPG) and the ‘basic conditions’ at paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.
- 5.4 In particular, these representations respond and **object** to the following policies by virtue of the following proposed designations of the Site (referred to as ‘Victoria House Parkland’);
- **Policy FUL/01.** Protecting the Distinctiveness and Landscape Setting of Fulbourn
 - Important Visual Gap designation
 - Important Countryside Frontage designation
 - **Policy FUL/05.** Local Green Space and Protected Village Amenity Areas
 - Local Green Space designation
- 5.5 The above proposed designations are unjustified and contrary to the National Planning Policy Framework and Planning Practice Guidance. The draft Fulbourn Neighbourhood Plan therefore fails to meet requirement “(a)” of the basic conditions as set out in the Town and Country Planning Act and Planning Practice Guidance. Accordingly, Policy FUL/01 and Policy FUL/05 require further amendment, as outlined within these representations, to ensure that the Neighbourhood Plan meets the basic conditions.
- 5.6 No robust evidence is provided to support the view that the Site should be designated within an Important Visual Gap, Important Countryside Frontage or Local Green Space.
- 5.7 The Site is in private ownership and immediately to the south of the main Capital Park campus and to the east of part of the Fulbourn and Ida Darwin Hospital site (allocated under the existing adopted South Cambridgeshire District Council Local Plan (Policy H/3: Fulbourn and Ida Darwin Hospitals). It is inappropriate to use a neighbourhood plan to try to allocate land in this manner, it is private land in the hands of a commercial company. No attempts have been made to contact the landowner to discuss this option, but for the avoidance of doubt, the land owner is not willing to set this land aside for recreational use or provide public access to it.
- 5.8 The existing Green Belt and Conservation Area designation and policy under the adopted South Cambridgeshire Local Plan (208) is sufficiently robust without the need for an additional layer of restrictive policy.
- 5.9 In particular reference to the proposal to designate Victoria House Parkland as a Local Green Space, the Site does not hold individual or cumulative value against the relevant assessment and

does not display characteristics for qualifying sites described by the Planning Practice Guidance criteria to warrant such a policy designation.

APPENDIX 1

SITE LOCATION PLAN

Capital Park



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Object

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** KG Moss Will Trust & Moss Family**Agent:** Carter Jonas**Date received:** 17/01/2022 via Web**Summary:****Full text:**

REPRESENTATIONS TO REG.16 DRAFT SUBMISSION FULBOURN NEIGHBOURHOOD PLAN

Planning Objectives
OBJECT

Paragraph 5.6 of the Draft Submission Fulbourn Neighbourhood Plan (Draft FNP) identifies the planning objectives for the document. There are two planning objectives that are relevant to these representations for the KG Moss Will Trust and the Moss Family, which are as follows: 4. Have a mix of housing that is affordable, available and suitable for all ages and appropriate to the village location; and 6. Improve amenities and community facilities.

As highlighted in the representations to Section 10: Housing, Draft FNP does not allocate any land for housing development, and the outstanding housing commitments for major development (at the Ida Darwin Hospital and land off Teversham Road sites) already define affordable housing obligations with only a small proportion specifically directed to those with a local connection to Fulbourn. As such, Draft FNP would have no influence on the delivery of affordable housing in Fulbourn because decisions about housing and affordable housing within the village have already been taken. Draft FNP does not seek to address the current identified needs for affordable housing for those with a local connection or the concerns raised by residents and employers about housing affordability. It is considered that Planning Objective No.4 is ineffective because affordable housing needs for those with a local connection will remain unmet during the plan period to 2031.

As highlighted in the representations to Policies FUL/14: Community Facilities and FUL/15: Healthcare Facilities, it is not clear whether there is landowner agreement for the proposed extension to the recreation ground, how or where the proposed new multi-purpose health centre would be provided, or where the community aspiration for additional allotments would be located. It is noted that the housing commitments at the Ida Darwin Hospital and land off Teversham Road sites already define planning obligations for health and community facilities, and include health service funding for Cherry Hinton Health Centre. Draft FNP contains no strategy to ensure the delivery or funding of these community facilities during the plan period to 2031, and as such Planning Objective No.6 is ineffective because the amenities and community facilities in the village would not be improved. Draft FNP ignores the fact that new recreation, health and community facilities are typically delivered in conjunction with new development or funded in part by planning obligations derived from new development, but does not consider this approach to deliver new or improved facilities.

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, in order to achieve Planning Objectives No.4 and No.6.

Figure 8: Neighbourhood Plan Policy Map Summary
OBJECT

KG Moss Will Trust owns land off Home End and the Moss Family own land at Court Meadow House off Balsham Road in Fulbourn. A site location plan for each site is enclosed with these representations.

The land off Home End is included within a 'locally important view' (Ref. C8), and the Important Countryside Frontage designation in this location (from Policy NH/13 of the adopted South Cambridgeshire Plan) is shown on Figure 8.

Evidence Paper 1: Key Village Views, prepared to support Draft FNP, claims to provide the evidence for the 'locally important views' designation. However, it is noted that there are no photographs or illustrative material provided in Evidence Paper 1 to show those important views or to highlight their particular importance. The 'view' from land off Home End and 'locally important view' Ref. C8 is of buildings, a paddock, a car park, and a sport and recreation ground including cricket and football pitches, a skateboard park, bowling green, tennis courts, and multi-use games area, an equipped play area, and a sports pavilion building. The 'view' from this location is dominated by the sport and recreation facilities, and there are no landmarks or features that make this 'view' particularly important to justify special protection. The Fulbourn Village Design Statement is not supported by any landscape or visual assessments to inform the 'key outward view from the village' designation from the land off Home End location, and so does not provide the evidence to inform the 'locally important view' designations at Ref. C8 in Draft FNP. In the absence of any evidence the proposed 'locally important view' designation at Ref. C8 is not consistent with national guidance (see Paragraph 041 (Ref ID: 41) of the PPG) and does not meet Basic Condition (a). It is requested that the 'locally important views' designation at land off Home End (Ref. C8) is

deleted from Figure 8.

Figure 8 shows the Important Countryside Frontage designation at land off Home End, as derived from Policy NH/13 of the adopted South Cambridgeshire Plan. Criteria (f) of Paragraph 16 in the NPPF expects development plans, including neighbourhood plans, to avoid unnecessary duplication of policies. The Important Countryside Frontage Designation at land off Home End is already identified on the Proposals Map of the South Cambridgeshire Local Plan, and therefore it is not necessary for Figure 8 in Draft FNP to replicate that designation. The inclusion of the adopted Important Countryside Frontage at land off Home End is not consistent with national policy (see Paragraph 16(f) of the NPPF) and as such does not meet Basic Condition (a). It should be noted that the made Histon & Impington Neighbourhood Plan does not refer to or repeat the important countryside frontage designations in that village; a consistent approach should be applied for all neighbourhood plans in South Cambridgeshire and all references to adopted important countryside frontages in Draft FNP should be deleted. Despite the above, it is considered that the land off Home End does not actually meet the criteria to be designated as an important countryside frontage for the following reasons. The site is surrounded by buildings and a car park. There are sport and recreation facilities and associated car parking areas between the site and the countryside beyond. The surrounding rural area is not clearly visible from the site because the sports and recreation facilities intervene, and therefore there cannot be a 'significant connection' between the site and the rural area. The characteristics of this site have changed significantly since the Important Countryside Frontage was first designated. It is requested that the adopted Important Countryside Frontage designation at land off Home End is deleted from Figure 8.

The land at Court Meadow House off Balsham Road is partly covered by the indicative green infrastructure network designation of Policy FUL/03 and is adjacent to a proposed extension to the recreation ground allocation of Policy FUL/15.

As set out in the representations to Policy FUL/03, the indicative green infrastructure network designations, as shown on Figure 8 do not correspond to the emerging strategic green infrastructure initiatives identified through the emerging Greater Cambridge Local Plan e.g. Strategic Green Infrastructure Initiative No.4: Enhancement of the Eastern Fens located on the eastern edge of Fulbourn. The designated nature conservation sites included in Strategic Green Infrastructure Initiative No.4 are Fulbourn Fen SSSI, Great Wilbraham Common SSSI and Wilbraham Fens SSSI. The desire in Draft FNP to connect the designated nature conservation sites with green infrastructure corridors is understood. However, it is not clear how the indicative green infrastructure network identified in Figure 8 and through Policy FUL/03 would be delivered. The focus for funding of green infrastructure projects in and around Fulbourn will be the strategic initiatives identified through the emerging Greater Cambridge Local Plan, including Strategic Green Infrastructure Initiative No.4 that coincides with designated nature conservation sites managed by local wildlife organisations. Any funding for wildlife enhancement through the environmental stewardship scheme or any similar rural initiative is outside the scope of the planning system. The planning obligations associated with the two housing commitments at Fulbourn (the Ida Darwin Hospital site and at land off Teversham Road) are already defined, including those related to green infrastructure, and as such no funding for the indicative green infrastructure network designations would be available from these developments. There are no allocations for development in Draft FNP that might support the delivery of the indicative green infrastructure network or any biodiversity net gain. It is not clear whether there has been any discussion or agreement with affected landowners about the delivery of the indicative green infrastructure network on their land; for example there has been no contact with the Moss Family in respect of the green infrastructure network proposed through land at Court Meadows House off Balsham Road. Therefore, there is no funding or delivery mechanism identified in Draft FNP for the implementation of the indicative green infrastructure network, and in the absence of such a mechanism the proposed network should be deleted from Figure 8. It is requested that the indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted from Figure 8. It would be possible to deliver green infrastructure in conjunction with development at land at Court Meadow House and consistent with the proposed green infrastructure network at the site e.g. a wildlife corridor alongside the existing hedgerows and bridleway, but that approach is not an option identified or supported in Draft FNP.

As set out in the representations to Policy FUL/14, it is not clear whether there is landowner agreement or funding to enable the proposed delivery of the extension to the recreation ground as identified in Figure 8. The planning obligations for local sport and recreation facilities from the two committed housing developments in Fulbourn (at the Ida Darwin Hospital site and at land off Teversham Road) are already specified in the respective s106 Agreements, and do not relate to an extension of the recreation ground. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations where planning obligations could be sought to contribute towards the proposed extension to the recreation ground. Therefore, in the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Figure 8. An extension to the recreation ground could be delivered in conjunction with development at land off Balsham Road, including land at Court Meadow House, but that approach is not an option identified or supported in Draft FNP.

Requested Change

The following changes are requested to Figure 8.

The 'locally important views' designation at land off Home End (Ref. C8) is deleted.

The adopted Important Countryside Frontage designation at land off Home End is deleted.

The indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted.

The proposed extension to the recreation ground is deleted.

Policy FUL/01: Protecting the Distinctiveness and Landscape Setting of Fulbourn
OBJECT

Policy FUL/01 seeks to protect the setting of Fulbourn, and refers to important countryside frontages, locally important views, and openness and appearance of fields. It also refers to the guidance provided in the Fulbourn Village Design Guide.

In summary, the Green Belt and the Development Framework boundaries in the adopted South Cambridgeshire Local Plan 2018 already limits the extent of development around the village, and severely restrict the possibility of any major new development coming forward in the future other than existing commitments which already have planning permission. It is noted that Draft FNP makes no allocations for residential or any other types of development. There are policies in the adopted Local Plan that do allow recreation facilities and rural exception affordable housing in the Green Belt. The designated village amenity areas, local green space and important countryside frontage designations in the adopted Local Plan identify areas within the Development Framework boundary of the village where additional development of all types is prevented. As explained in these representations, it is considered that Draft FNP seeks to identify additional policy designations around all parts of the village in order to prevent any major development from coming forward or being allocated through the emerging Greater Cambridge Local Plan process.

Bullet Point No.3 of Policy FUL/01 relates to Important Countryside Frontages and refers to Policy NH/13 of the adopted South Cambridgeshire Local Plan. It is not clear whether Policy FUL/01 relates to the adopted Important Countryside Frontages as defined in the Local Plan, those proposed new Important Countryside Frontages to be defined in Draft FNP, or both adopted and proposed. Figure 8 of Draft FNP includes the adopted and proposed Important Countryside Frontage designations, but Figure 9 only includes the proposed designations. Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. It is not necessary for Policy FUL/01 to refer to adopted Important Countryside Frontages, when a policy already exists in Policy NH/13 of the adopted South Cambridgeshire Local Plan. If Policy FUL/01 is intended to apply to adopted Important Countryside Frontage designations, then this would represent a duplication of policies and is not consistent with national guidance and so does not meet Basic Condition (a). If Policy FUL/01 does not apply to adopted Important Countryside Frontage designations then that needs to be made clear in the policy text. As set out in the representations to Figure 8: Neighbourhood Plan Policy Map Summary, the KG Moss Will Trust land off Home End does not actually meet the criteria to be designated as an important countryside frontage because the surrounding rural area is not clearly visible from the site since the sports and recreation facilities intervene.

Bullet Point No.4 of Policy FUL/01 refers to locally important views, which are identified in Figure 9. The land off Home End is included within a ‘locally important view’ (Ref. C8). Evidence Paper 1: Key Village Views, prepared to support Draft FNP, claims to provide the evidence for the ‘locally important views’ designation. However, it is noted that there are no photographs or illustrative material provided in Evidence Paper 1 to show those important views or to highlight their particular importance. The ‘view’ from land off Home End and ‘locally important view’ Ref. C8 is of buildings, a paddock, a car park, and a sport and recreation ground including cricket and football pitches, a skateboard park, bowling green, tennis courts, and multi-use games area, an equipped play area, and a sports pavilion building. The ‘view’ from this location is dominated by the sport and recreation facilities, and there are no landmarks or features that make this ‘view’ particularly important to justify special protection. The Fulbourn Village Design Statement is not supported by any landscape or visual assessments to inform the ‘key outward view from the village’ designation from the land off Home End location, and so does not provide the evidence to inform the ‘locally important view’ designations at Ref. C8 in Draft FNP. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. In the absence of any evidence the proposed ‘locally important view’ designation at Ref. C8 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that the ‘locally important views’ designation at land off Home End (Ref. C8) is deleted from Policy FUL/01 and from Figures 8 and 9.

Bullet Point No.5 of Policy FUL/01 seeks to avoid adverse impacts on the openness and appearance of fields that contribute to the setting of the ‘locally important views’. The adopted South Cambridgeshire Local Plan 2018 includes policies on the Green Belt (Policy S/4) and Development Frameworks (Policy S/7). The adopted Policies Map defines the boundaries for both these designations. Policy S/4 refers to national Green Belt policy, which is set out in Section 13 of the NPPF. The principles of openness, preventing unrestricted sprawl and the coalescence of settlements, safeguarding the countryside from encroachment, and protecting the setting of settlements is already established in national Green Belt policy – see Paragraphs 137 and 138. Criteria (f) of Paragraph 16 of the NPPF states that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. It is not necessary for Bullet Point No.5 of Policy FUL/01 to repeat development plan and national guidance on openness of the Green Belt or development plan policies restricting development outside village boundaries. Therefore, Policy FUL/01 is not consistent with national guidance and does not meet Basic Condition (a). It is requested that references to openness and appearance of fields that contribute to the setting of the ‘locally important views’ is deleted from Bullet Point No.5.

Bullet Point No.6 refers to the Fulbourn Village Design Guide. The Guide is adopted as a supplementary planning document, and provides design guidance for the village in the context of Policy HQ1: Design Principles of the adopted South Cambridgeshire Local Plan. Therefore, any development proposals in Fulbourn would already be assessed against

Policy HQ1 and the guidance in the Fulbourn Village Design Guide. Criteria (f) of Paragraph 16 of the NPPF seeks to avoid the duplication of policies, and therefore it is not necessary for Bullet Point No.6 of Policy FUL/01 to repeat existing development plan policy and adopted guidance, and does not meet Basic Condition (a). It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Furthermore, the Fulbourn Village Design Guide was not informed by any landscape or visual evidence, and some of the terminology used in the document to describe parcels of land is not explained or robust. For example, Figure 17 of the Guide identifies the land off Home End as 'fields with sensitive visual relationship with the village' and as a 'key outwards views from the village', and the land off Balsham Road as part of a 'key views to the village'. The land off Home End is surrounded by buildings and a car park with sport and recreation facilities beyond, and as such the site is not sensitive and it has limited physical or visual relationship with the countryside and does not represent a 'key' outward view from the village. The views of the village from Balsham Road are limited, and could not be described as 'key' views. The Fulbourn Village Design Guide does not provide the evidence to explain or justify the designations referred to in Policy FUL/01.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that any references to adopted Important Countryside Frontages from Policy NH/13 of the adopted South Cambridgeshire Local Plan are deleted from Bullet Point No.3.

It is requested that the 'locally important views' designation at land off Home End (Ref. C8) is deleted from Bullet Point No.4 and from Figures 8 and 9.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Policy FUL/02: Development outside the Development Framework

OBJECT

As set out in the representations to Policy FUL/01, the Green Belt and the Development Framework boundary around Fulbourn are already defined in the adopted South Cambridgeshire Local Plan, and the type and mix of uses permitted in these locations is already defined in development plan policy and national guidance. Policy HQ1 of the adopted Local Plan already adequately deals with design matters, and further guidance is provided in the National Design Guide and in Planning Practice Guidance. The Fulbourn Village Design Guide provides local guidance. Criteria (f) of Paragraph 16 of the NPPF states that plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)". It is not necessary for Policy FUL/02 to repeat development plan policies or national and local guidance on development outside village boundaries or design matters. Therefore, Policy FUL/02 is not consistent with national guidance and does not meet Basic Condition (a).

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Policy FUL/03: Creating a Connected Green Infrastructure Network

OBJECT

Policy FUL/03 seeks to deliver a green infrastructure network around Fulbourn, and Figure 11 (and Figure 8) identifies the locations for the indicative network. A large part of the land owned by the Moss Family at Court Meadow House off Balsham Road is included within the indicative green infrastructure network.

The indicative green infrastructure network designation, as shown on Figure 11 does not correspond to the emerging strategic green infrastructure initiatives identified through the emerging Greater Cambridge Local Plan – see pg. 73 to 80 of Greater Cambridge Green Infrastructure Opportunities Mapping Part 2 Recommendations Report (available at https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/GREATE~3_0.PDF). Strategic Green Infrastructure Initiative No.4: Enhancement of the Eastern Fens is located on the eastern edge of Fulbourn, and includes designated nature conservation sites of Fulbourn Fen SSSI, Great Wilbraham Common SSSI and Wilbraham Fens SSSI. The Part 2 Recommendations Report identifies delivery partners, a strategy and funding for Strategic Green Infrastructure Initiative No.4. The focus for the delivery and funding of green infrastructure projects around Fulbourn will be Strategic Green Infrastructure Initiative No.4 and the designated nature conservation sites managed by local wildlife organisations on the eastern edge of the village. It is not clear how the indicative green infrastructure network identified in Figure 11 and through Policy FUL/03 would be funded or delivered.

Policy FUL/03 refers to development supporting the delivery of the green infrastructure network, including new open space, wildlife areas, biodiversity net gain, and new walking/cycling routes to the countryside. However, there are no allocations for development in Draft FNP that might support the delivery of the indicative green infrastructure network or any biodiversity net gain. In the absence of any allocations for development it is not clear how the indicative green

infrastructure network identified in Figure 11 would be delivered. As set out above, Strategic Green Infrastructure Initiative No.4 to be identified as part of the emerging Greater Cambridge Local Plan will be the focus for any funding on the eastern edge of Fulbourn. Any funding for wildlife enhancement through the environmental stewardship scheme or any similar rural initiative is outside the scope of the planning system.

It is not clear whether there has been any discussion or agreement with affected landowners about the delivery of the indicative green infrastructure network on their land. For example there has been no contact with the Moss Family in respect of the green infrastructure network proposed through land at Court Meadows House off Balsham Road. It is not clear how the green infrastructure network at the site would be delivered without landowner agreement and in the absence of development.

Therefore, there is no funding or delivery mechanism identified in Draft FNP for the implementation of the indicative green infrastructure network, and in the absence of such a mechanism Policy FUL/03 and Figure 11 should be deleted. It is requested that the indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted from Figure 11.

It would be possible to deliver green infrastructure in conjunction with development at land at Court Meadow House and consistent with the proposed green infrastructure network at the site e.g. a wildlife corridor alongside the existing hedgerows and bridleway, but that approach is not an option identified or supported in Draft FNP.

Requested Change

It is requested that, in the absence of funding or a delivery mechanism for the implementation of the indicative green infrastructure network, Policy FUL/03 and Figure 11 should be deleted

The following changes are requested to Figure 11:

The indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted.

Section 10: Housing

OBJECT

Section 10 of Draft FNP relates to housing, and Policy FUL/09 relates to housing developments including local housing needs. In summary, Section 10 refers to housing needs data and committed housing developments in Fulbourn. It is noted that despite the current and longstanding need for affordable housing in the village, there are no housing allocations or strategy to deliver housing or affordable housing in Draft FNP.

South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2019) provides the most recent information on local affordable housing needs i.e. those with a local connection to villages in the District, including Fulbourn, Teversham and Great Wilbraham – see <https://www.scambs.gov.uk/media/18316/affordable-housing-housing-statistical-information-leaflet-december-2019.pdf>. The current local housing needs for these three villages is as follows: Fulbourn – 65; Teversham – 21; and Great Wilbraham – 4. The Affordable Housing Needs Survey carried out by ACRE in December 2015 is out of date. The affordable housing needs of Teversham and Great Wilbraham could be met in Fulbourn, since these two villages are referred to in local connection criteria for recent affordable housing planning obligations. The current local affordable housing need should be stated as 90 dwellings. It should be noted that this current need does not take into account future needs that are likely to arise during the plan period.

Paragraph 10.3 refers to the number of dwellings to be provided at three existing housing commitments, and it is assumed that affordable housing needs would be met from these developments. However, as set out below, that is not the case. The details of the three committed housing commitments are as follows:

- App Ref. S/3396/17/FL: A rural exception housing scheme off Balsham Road for 14 affordable dwellings. The s106 Agreement includes a planning obligation requiring the affordable housing to be occupied by those that can demonstrate a local connection to Fulbourn. The development is complete.
- App Ref. S/0202/17/OL: An application for 110 dwellings off Teversham Road, with 30% affordable housing which equates to 33 affordable dwellings. The s106 Agreement includes an affordable housing obligation requiring the first 8 affordable dwellings only to be offered to those that can demonstrate a local connection, with the remainder of the affordable housing available for district-wide housing needs.
- S/0670/17/OL: An application for 203 dwellings at the former Ida Darwin Hospital site, with 40% affordable housing which equates to 81 dwellings. The s106 Agreement does not include any obligations specifying that affordable housing must be offered to those with a local connection, and therefore the affordable housing is available for district-wide needs.

Therefore, all of the Balsham Road development was available to meet local housing needs, a small proportion of the Teversham Road development will be available for local housing needs, and none of the Ida Darwin Hospital development will be specifically allocated to meet local housing needs. It is acknowledged that those with a local connection to Fulbourn, Teversham and Great Wilbraham might apply for an affordable dwelling at the Teversham Road and Ida Darwin Hospital developments, but it is likely that the majority of affordable dwellings provided at these developments will be allocated to meet district-wide housing needs. The affordable housing needs of 22 households with a local connection to Fulbourn would definitely be met from these three developments, and the affordable housing needs of some others with a local connection would probably also be met, but it is very likely that a substantial proportion of

current local housing needs will remain unmet. It is inevitable that additional affordable housing needs will arise in the near future, from within Fulbourn and across the district.

As set out elsewhere in these representations, there are existing development plan policies and national designations that limit the amount of new housing that can be provided within and on the edge of Fulbourn e.g. Green Belt, Development Frameworks, Conservation Area, Listed Buildings, Local Green Space, Protected Village Amenity Area, Important Countryside Gap etc, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Any rural exception housing scheme is still required to address impacts on Green Belt openness and satisfy all other policy designations, and is reliant on a willing landowner to gift land for this purpose. It is likely that any redevelopment or infill development opportunities within Fulbourn would be small scale and fall below the threshold where affordable housing is required. In these circumstances, it is not clear how, where or when the current identified affordable housing needs of the village will be met, and Draft FNP takes no action to ensure that affordable housing needs are actually met. It is considered that the problems and consequences associated with not providing enough affordable housing in Fulbourn – as highlighted in Paragraphs 10.18 to 10.20 of Draft FNP - will continue for the foreseeable future.

Paragraph 8 of the NPPF identifies the three strands of sustainable development, and the social objective includes meeting housing needs. Paragraph 15 expects plans to provide a framework for addressing housing needs. Paragraph 60 sets out the Government's objective to boost significantly the supply of housing. Paragraph 62 expects planning policies to reflect the needs for different types of housing including affordable housing. As explained above, the affordable housing needs of Fulbourn are known, but Draft FNP contains no allocations or policies to ensure the delivery of additional affordable housing. Therefore, Section 10 is inconsistent with national guidance and so does not meet Basic Condition (a), and would not achieve sustainable development because affordable housing needs would remain unmet and so does not meet Basic Condition (d).

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify a sufficient amount of land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Policy FUL/14: Community Facilities OBJECT

Policy FUL/14 allocates land for an extension to the recreation ground, which is identified on Figures 8 and 19. The rationale for seeking an extension to the recreation ground is explained in Paragraph 12.5. KG Moss and subsequently the KG Moss Will Trust previously owned parcels of land at the existing recreation ground, which were subject to compulsory purchase or private sale now being used for recreational, car parking and allotment purposes. It is noted that some improvements to community facilities will be delivered in the near future via planning obligations from the committed developments at the Ida Darwin Hospital site and at land of Teversham Road. The s106 Agreement for the Ida Darwin Hospital site includes planning obligations relating to open space and play areas to be provided on site, but there are no obligations relating to sport and recreation facilities. The s106 Agreement for the land off Teversham Road development includes a sports space contribution for the refurbishment or extension of the sports pavilion, but no obligations relating to land for sport and recreation facilities. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations where planning obligations could be sought to contribute towards the proposed extension to the recreation ground.

It is not clear from Policy FUL/14 or the supporting text whether there is landowner agreement or funding to enable the delivery of the extension to the recreation ground. There should be some evidence that the land required for the proposed extension to the recreation has been discussed with the landowner and that there is at least an agreement in principle. As set out above, the two major developments in Fulbourn do not make any planning obligations towards the funding of an extension to the recreation ground. If there is no landowner agreement or source of funding to purchase the land and provide the extension to the recreation ground it is unlikely that it would be delivered, and as such will remain an aspiration only.

Paragraph 93 of the NPPF expects planning policies to support the delivery of the social, recreational and cultural facilities and services the community needs. As set out above, the delivery of the proposed extension to the recreation ground is uncertain. For this reason, Policy FUL/14 is inconsistent with national guidance and so does not meet Basic Condition (a). Therefore, in the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

An extension to the recreation ground could be delivered in conjunction with development in this location. The land owned by KG Moss Will Trust off Home End could make planning contributions towards sport and recreation facilities in the village. The land owned by the Moss Family at Court Meadow House off Balsham Road could provide planning

contributions and additional land to support the delivery of the extension to the recreation ground. The option of additional development in Fulbourn providing for the extension to the recreation ground is not identified or considered in Draft FNP.

Requested Change

It is requested that Policy FUL/14 and the supporting text is amended to explain how the proposed extension to the recreation ground will actually be delivered, including confirmation of landowner agreement and an indication of sources of funding to enable delivery of these facilities. In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

Policy FUL/15: Healthcare Facilities OBJECT

Policy FUL/15 relates to existing and future healthcare facilities in the village, and seeks to support additional health related facilities either on the site of the existing health centre or at another location within the village. Paragraphs 12.7 and 12.8 seeks to explain the rationale for additional health facilities, and refers to enabling residential development to support the delivery of additional facilities. KG Moss previously owned the land around the current health centre and a majority of the land used for the large housing development to the north side of Cambridge Road on the Fulbourn side of Windmill Hill bounded by Haggis Gap which was subject to compulsory purchase. This development has since been redeveloped. The aspiration for a new health centre for the village has existed for a number of years.

It is noted that some improvements to community facilities will be delivered in the near future via planning obligations from the proposed developments at the Ida Darwin Hospital site and at land off Teversham Road. The s106 Agreements for both these developments include planning obligations towards the health services at Cherry Hinton Health Centre, but not for the Fulbourn Health Centre. There are no other large scale developments planned or proposed within Fulbourn, and the Draft FNP makes no allocations for residential development where planning obligations could be sought to contribute towards additional health facilities.

It is not clear whether any local health service or provider has identified a need for additional or new health facilities in Fulbourn and has a strategy to deliver such a facility; recent planning obligations have been directed to Cherry Hinton Health Centre. It is not clear whether funding is available to support the delivery of the proposed new multi-purpose health centre, either on the existing site or elsewhere within the village. If a new site is required, it is not clear whether land or a suitable site is available. There are no significant previously developed land opportunities available in the village, existing development plan policies and national designations limit development opportunities outside the village boundary e.g. Green Belt and Development Frameworks, and Draft FNP seeks to create additional restrictive policy designations e.g. 'locally important views'. Furthermore, Draft FNP makes no allocations for residential development that might enable the delivery of a multi-purpose health centre. If there is no strategy or mechanism for the provision of a new multi-purpose health centre in the village it is unlikely that it would be delivered, and as such will remain an aspiration only.

Paragraph 93 of the NPPF expects planning policies to support the delivery of community facilities including health facilities and the delivery of health strategies. As set out above, the delivery of the proposed multi-purpose health centre is uncertain. For this reason, Policy FUL/15 is inconsistent with national guidance and so does not meet Basic Condition (a). Therefore, in the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, including land for a new building or land for enabling residential development, it is requested that Policy FUL/15 is deleted.

Draft FNP does not consider the option of a multi-purpose health centre being delivered in conjunction with additional residential development. For example, if allocated for residential development the land owned by KG Moss Will Trust off Home End could make planning contributions towards additional health facilities in the village, and the land owned by the Moss Family at Court Meadow House off Balsham Road could provide land for a multi-purpose health centre as part of a mixed use development.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would actually be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Change suggested by respondent:

Requested Change

It is requested that Draft FNP is amended to include a strategy to meet the identified affordable housing needs for those with a local connection and to ensure the delivery of an extension to the recreation ground and a new multi-purpose health centre, in order to achieve Planning Objectives No.4 and No.6.

Requested Change

The following changes are requested to Figure 8.

The 'locally important views' designation at land off Home End (Ref. C8) is deleted.

The adopted Important Countryside Frontage designation at land off Home End is deleted.
The indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted.
The proposed extension to the recreation ground is deleted.

Requested Change

The following changes are requested to Policy FUL/01

It is requested that any references to adopted Important Countryside Frontages from Policy NH/13 of the adopted South Cambridgeshire Local Plan are deleted from Bullet Point No.3.

It is requested that the 'locally important views' designation at land off Home End (Ref. C8) is deleted from Bullet Point No.4 and from Figures 8 and 9.

It is requested that references to openness and appearance of fields that contribute to the setting of the 'locally important views' is deleted from Bullet Point No.5.

It is requested that reference to compliance with the Fulbourn Village Design Guide is deleted from Bullet Point No.6.

Requested Change

It is requested that Policy FUL/02 is deleted because it repeats development plan policies and national and local guidance on development outside village boundaries and design matters.

Requested Change

It is requested that, in the absence of funding or a delivery mechanism for the implementation of the indicative green infrastructure network, Policy FUL/03 and Figure 11 should be deleted

The following changes are requested to Figure 11:

The indicative green infrastructure network designation for land at Court Meadow House off Balsham Road is deleted.

Requested Change

It is requested that Section 10 is amended to include a clear commitment that all identified local affordable housing needs will be met by 2031, and to assess and allocate housing sites where affordable housing or a proportion of affordable housing can be delivered. If it is not possible to identify a sufficient amount of land to meet affordable housing needs because of policy constraints, then Section 10 should include a commitment to support the release of land from the Green Belt through the emerging Greater Cambridge Local Plan process to ensure the delivery of additional affordable housing in Fulbourn.

Requested Change

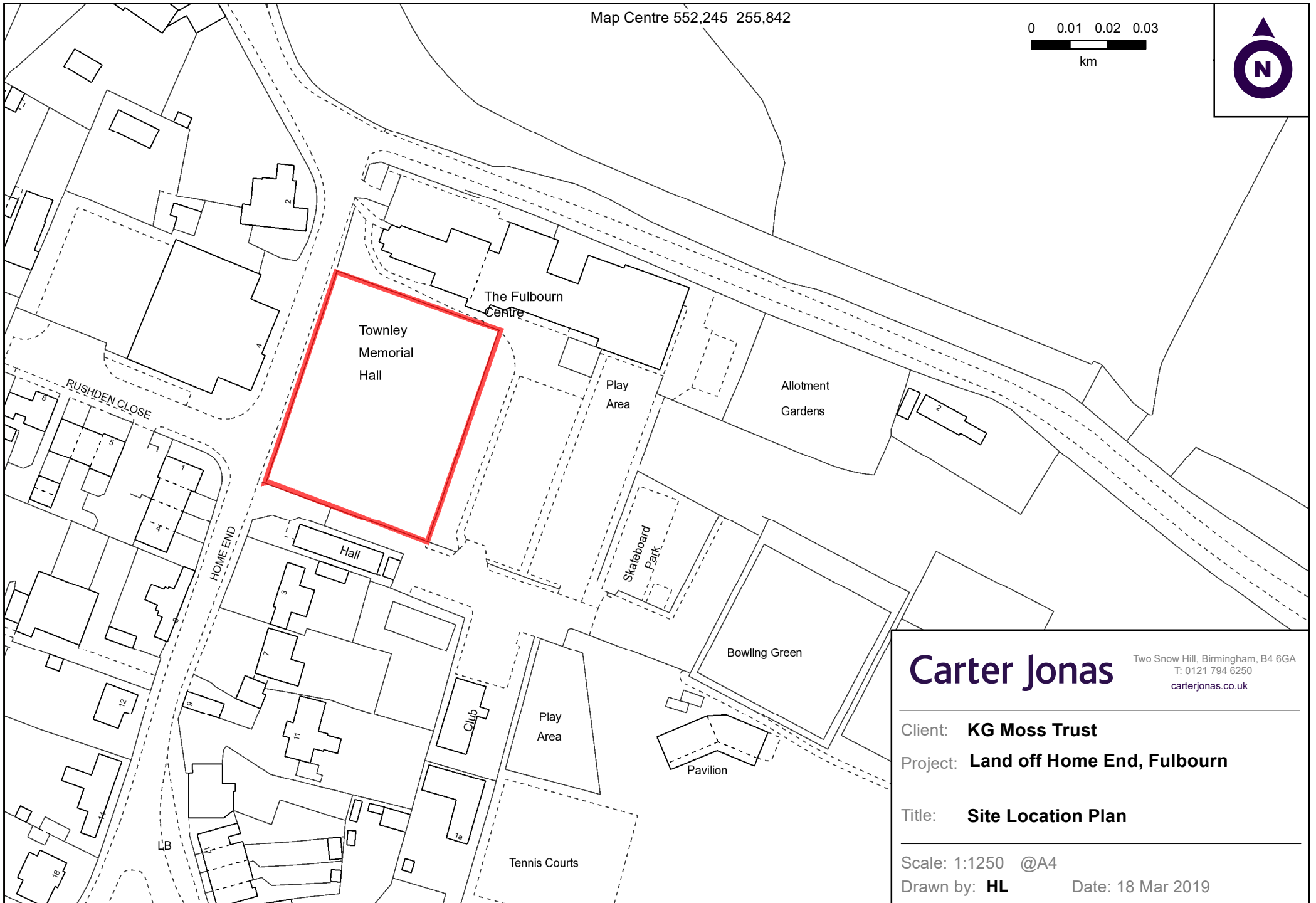
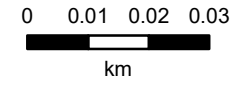
It is requested that Policy FUL/14 and the supporting text is amended to explain how the proposed extension to the recreation ground will actually be delivered, including confirmation of landowner agreement and an indication of sources of funding to enable delivery of these facilities. In the absence of any mechanism for the delivery of the extension to the recreation ground, it is requested that this site allocation is deleted from Policy FUL/14 and from Figures 8 and 19.

Requested Change

It is requested that Policy FUL/15 and the supporting text is amended to explain how the proposed multi-purpose health centre would actually be delivered, including an indication of sources of funding, potential suitable relocation sites, and potential suitable enabling residential sites. In the absence of any strategy or mechanism for the delivery of the multi-purpose health centre, it is requested that Policy FUL/15 is deleted.

Attachments: Site Location Plan - Land adj Court Meadows House, Balsham Road, Fulbourn.PDF - <https://cambridge.oc2.uk/a/3v5ss>
Site Location Plan- Land off Home End, Fulbourn.PDF - <https://cambridge.oc2.uk/a/3v5st>

Map Centre 552,245 255,842



Carter Jonas

Two Snow Hill, Birmingham, B4 6GA
T: 0121 794 6250
carterjonas.co.uk

Client: **KG Moss Trust**

Project: **Land off Home End, Fulbourn**

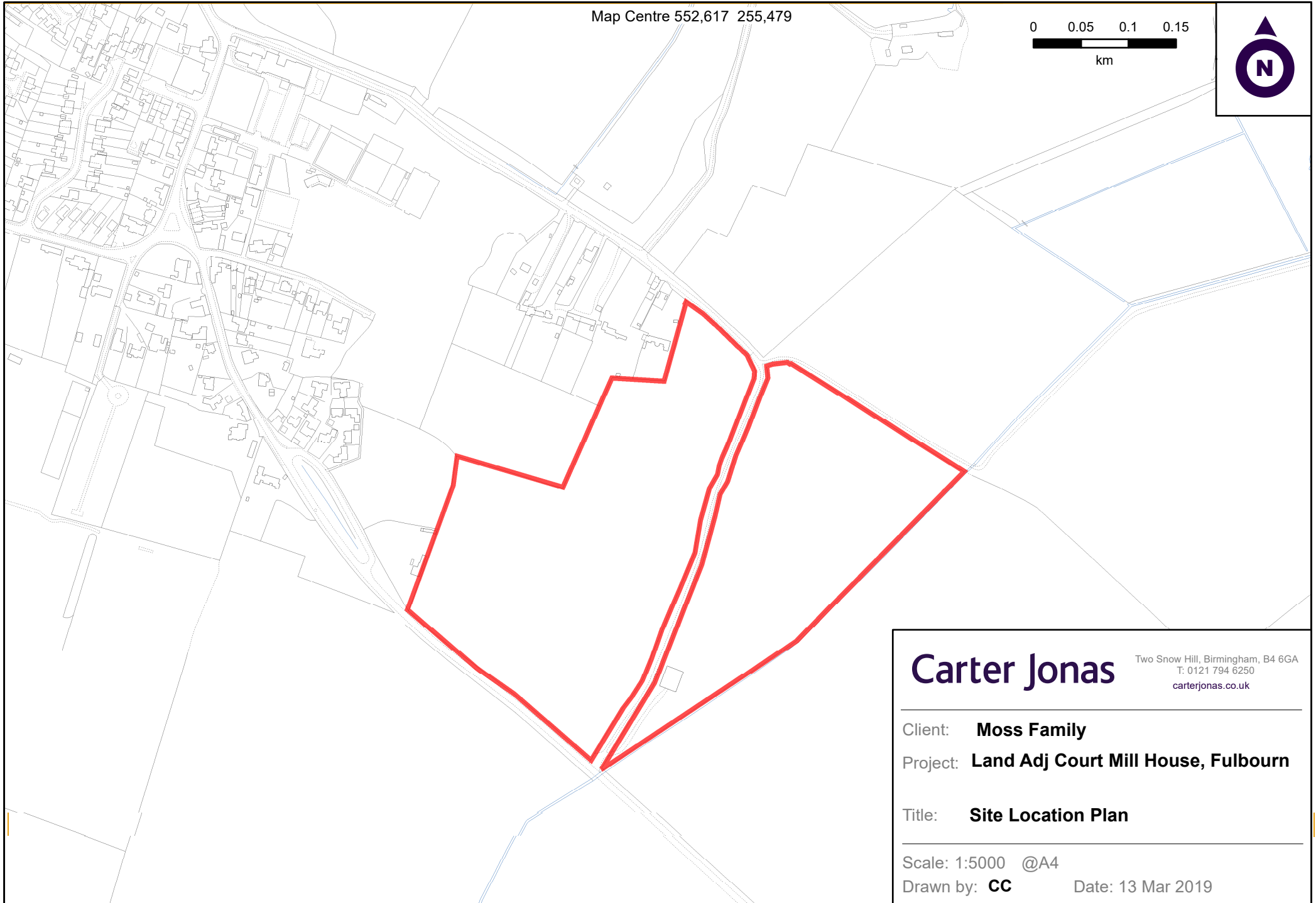
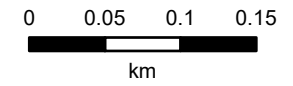
Title: **Site Location Plan**

Scale: 1:1250 @A4

Drawn by: **HL**

Date: 18 Mar 2019

Map Centre 552,617 255,479



Carter Jonas

Two Snow Hill, Birmingham, B4 6GA
T: 0121 794 6250
carterjonas.co.uk

Client: **Moss Family**

Project: **Land Adj Court Mill House, Fulbourn**

Title: **Site Location Plan**

Scale: 1:5000 @A4

Drawn by: **CC**

Date: 13 Mar 2019

59373

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version

Respondent: Natural England

Date received: 16/12/2021 via Email

Summary:

■ Natural England does not have any specific comments on this neighbourhood plan.

Full text:

■ -

Change suggested by respondent:

■ -

Attachments: Response Form - <https://cambridge.oc2.uk/a/3v5sx>

Date: 15 December 2021
Our ref: 373871
Your ref: Fulbourn Neighbourhood Plan – Submission Public Consultation



Jonathan Dixon
neighbourhood.planning@greatercambridgeplanning.org

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Dixon,

Fulbourn Neighbourhood Plan – Submission Public Consultation

Thank you for your consultation on the above dated 09 November 2021.

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.

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.

Natural England does not have any specific comments on this neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely,

Ben Jones
Consultations Team

59340

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

3 Planning Policy Framework

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

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. - <https://cambridge.oc2.uk/a/3v5s8>

59341

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

4 Local Context

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59348

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59354

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/07 Building and Landscape Design

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59356

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/08 – Village Street and Lane Layout

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

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59368

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Appendix 3 – Glossary

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

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59338

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Fulbourn Conservation Area Appraisal

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59339

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Extant planning permissions

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 override 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.

Relevant list of planning applications contained in full submission

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59342

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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

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.

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.

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59343

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/02 – Development Outside the Development Framework.

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).

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.

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?

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.

Part 2d – How would this criterion be achieved to maintain in perpetuity a soft outer edge to Fulbourn?

Full text:

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Change suggested by respondent:

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Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59344

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

7 Enhancing Rural Environment

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.’

Full text:

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Change suggested by respondent:

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Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
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59345

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/03 Creating a Connected Green Infrastructure Network.

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.

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.

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.

Full text:

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Change suggested by respondent:

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59347

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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 intension 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.

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?

It is unclear from the map what routes are for ecological movements versus those for sustainable transport like walking or cycle routes.

Full text:

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Change suggested by respondent:

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59346

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/03 Creating a Connected Green Infrastructure Network.

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.

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.

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.

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.

This section could emphasize 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?

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.

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.

Full text:

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Change suggested by respondent:

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59351

Support

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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

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.

Part 1 – In the first sentence delete the unnecessary ‘a’ after designated as.

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.

Full text:

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Change suggested by respondent:

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Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
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59352

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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

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 than 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://scambs.moderngov.co.uk/documents/s73905/Development%20Brief.pdf>

Full text:

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Change suggested by respondent:

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59350

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/04 Protection and Enhancement of Natural Features.

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.

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.

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?

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.

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.

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.

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.

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.

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."

Full text:

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Change suggested by respondent:

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59355

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/07 Building and Landscape Design

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".

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.

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 design-led 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.

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.

There are two sections within this policy numbered 2. This will need amending.

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?

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.

Full text:

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Change suggested by respondent:

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59353

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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

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.

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?

Parts 2c – This appears to be repeating the requirements in Part 1d +1e of Policy FUL/04 regarding trees?

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?

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.

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.

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".

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).

Full text:

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Change suggested by respondent:

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59357

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

10 Residential development

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.

Paragraph 10.7 for clarity it should be stated that it was Cambridgeshire ACRE that carried out the survey not Cambridge.

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)

Full text:

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Change suggested by respondent:

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59359

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

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

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.

Part 1b – We consider that this criterion simply repeats the Local Plan policy on affordable home (Policy H/10).

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.

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.

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

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 placed in Policy FUL/04?

Part 3b – This criterion repeats the policy included in the Local Plan – Policy CC/8: Sustainable Drainage Systems.

Part 3c – Does this criterion add any value as other policies within the Plan cover this issue – FUL/01; FUL/04.

Part 3d – This is repeating an existing policy in the Plan – FUL/03

Part 3e – This is repeating Policy FUL/01

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.

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.

Full text:

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Change suggested by respondent:

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59360

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/10 Rural Exception Sites

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.

Part 1d – This repeat what is already in Policy FUL/01 and FUL/04.

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.

Full text:

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Change suggested by respondent:

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59361

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/11 -Housing Design Quality

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.

Part 1b; 1f; 1h; 1i - These appear to be new criterion included in the Plan since the Regulation 14 consultation.

The inclusion of criteria that support sustainable construction – 1a, 1b and 1c is supported.

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 T1/3: Parking Provision.

Full text:

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Change suggested by respondent:

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59362

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/12 – Employment Development

Part 1 – The first part of this section is simply repeating the Local Plan Policy E/12.

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?

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.

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.

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?

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'.

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.

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?

Full text:

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Change suggested by respondent:

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59363

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/13 Large Employment Sites

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.

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.

Part 1 - The Plan does not need to mention that employment development should comply with relevant policies in the Local Plan.

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.

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.

Full text:

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Change suggested by respondent:

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59364

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/14 –Community Facilities

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)

Part 2 – It is not necessary to include the wording after (see Figure 19) relating to standards required by Sport England.

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.

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59365

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Policy FUL/15 –Healthcare Facilities

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.

Full text:

-

Change suggested by respondent:

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Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59366

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

15 Delivery Priorities

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.

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. -
<https://cambridge.oc2.uk/a/3v5s8>

59367

Comment

Supporting Documents, Fulbourn Neighbourhood Plan - Submission version**Respondent:** South Cambridgeshire District Council**Date received:** 17/01/2022 via Email**Summary:**

Appendix 2 - Trees

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.

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

Full text:

-

Change suggested by respondent:

-

Attachments: Fulbourn Neighbourhood Plan Decision Report January 2022 - <https://cambridge.oc2.uk/a/3v5s7>
Appendix 1 SCDC comments to Fulbourn Neighbourhood Plan Jan 2022. - <https://cambridge.oc2.uk/a/3v5s8>

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL
RECORD OF CHIEF OFFICER/HEAD OF SERVICE DECISION**

This form should be used to record key and other decisions made by Chief Officers and Heads of Service. The contact officer will ensure that the signed and completed form is given to Democratic Services as soon as reasonably practicable after the decision has been taken.

A key decision shall not be taken unless notice of the item has been published at least 28 days before the decision is to be taken except where:

- a General Exception notice has been published under Rule 15 of the Access to Information Procedure Rules and the Chairman of Scrutiny and Overview Committee has been informed in writing; or
- where a Special Urgency notice has been published under Rule 16 of those Rules and the Chairman of Scrutiny and Overview Committee has agreed the decision is urgent.

Unless permission has been obtained from the Chairman of Council and the Chairman of the Scrutiny and Overview Committee that a key decision may be treated as a matter of urgency under Rule 12.19 of the Scrutiny and Overview Committee Procedure Rules, any key decision will come into force, and may then be implemented, on the expiry of five working days after the publication of the decision, unless called in under Rule 7 of the Budget and Policy Framework Procedure Rules or Rule 12 of the Scrutiny and Overview Committee Procedure Rules. Where consent has been obtained to exempt the decision from call-in, this will be specified below. Only key decisions of an officer are subject to call-in.

Decision Taker	Lead Cabinet Member for Planning
Subject Matter	Fulbourn Neighbourhood Plan - response to consultation on the submission plan
Ward(s) Affected	Fulbourn
Date Taken	10 Jan 2022
Contact Officer	Alison Talkington Senior Planning Policy Officer Contact: Alison.Talkington@greatercambridgeplanning.org / 01954 713182 / mobile 07514 926521
Date Published	11 Jan 2022
Call-In Expiry/Exempt from call-in	
Key Decision?	No
In Forward Plan?	No – delegated decision for Lead Cabinet Member for Planning
Urgent?	Decision must be made by 18 January 2022

Purpose / Background

Purpose

1. The purpose of this report is to agree the Council's response to the public consultation on the submission version of the Fulbourn Neighbourhood Plan. The consultation runs for 10 weeks from 9 November 2021 until 18 January 2022.

Background

2. The Fulbourn Neighbourhood Area was designated on 13 August 2018. The neighbourhood area is for the whole parish of Fulbourn.
3. Officers have met with the steering group ahead of the formal pre-submission consultation process and recognise the hard work that those on the steering group of the neighbourhood plan have put into preparing the Plan. This group has strived to ensure that the whole village had an opportunity to have an input into the final Plan.
4. A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening was undertaken on a draft version of the Neighbourhood Plan, and a screening determination was published in November 2020.
5. Pre-submission public consultation on the draft Neighbourhood Plan was undertaken by the Parish Council from 1 January 2021 until 28 February 2021. Officers provided a formal response to the consultation, providing constructive comments about the Neighbourhood Plan to assist the neighbourhood plan group with finalising the Neighbourhood Plan. Officers have met with the steering group to discuss these comments and are aware that the submission version of the plan has taken upon board many of the suggested changes.
6. On 18 October 2021, Fulbourn Parish Council submitted their Neighbourhood Plan to SCDC. Officers have confirmed, as set out in the Legal Compliance Check for the Neighbourhood Plan that the submitted version of the Neighbourhood Plan and its accompanying supporting documents comply with all the relevant statutory requirements at this stage of plan making.
7. We therefore were able to carry out a consultation on the Fulbourn Neighbourhood Plan from 9 November 2021 until 18 January 2022. This extended period of consultation is to take into account that the consultation period extends over the Christmas and New Year holiday period. We wished to ensure everyone had an opportunity to comment on the Plan.
8. Officers, in conjunction with Fulbourn Parish Council, are in the process of appointing an independent examiner to consider this Neighbourhood Plan. All comments submitted during the public consultation on the submission version of the Neighbourhood Plan will be provided to the examiner for their consideration.

Considerations

9. The Fulbourn Neighbourhood Plan has been prepared by Fulbourn Parish Council to provide planning policies for development in the area, with the aim of providing greater clarity when determining planning applications in the area. The Neighbourhood Plan includes 16 planning policies that cover a range of issues including:
 - (i) Protecting the village setting and separation
 - (ii) Enhancing the rural environment
 - (iii) Local green spaces and amenity areas

- (iv) Village character
- (v) Residential development
- (vi) Employment
- (vii) Community facilities
- (viii) Sustainable transport and mobility.

10. To successfully proceed through its examination to a referendum, a Neighbourhood Plan must meet a number of tests known as the 'Basic Conditions'. These tests are different to the tests of soundness that a Local Plan must meet. The Basic Conditions are set out in national planning guidance and are summarised as follows:
- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
 - (b) the making of the Neighbourhood Plan contributes to the achievement of sustainable development.
 - (c) the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area.
 - (d) the making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and
 - (e) prescribed conditions are met in relation to the Neighbourhood Plan, including that the making of the neighbourhood plan is not likely to have a significant effect on a European wildlife site or a European offshore marine site either alone or in combination with other plans or projects.
 - (f) the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Our Neighbourhood Planning Toolkit includes Guidance Note 11 (What are the Basic Conditions and How to Meet Them), which sets out further details on each of the Basic Conditions. When a Neighbourhood Plan is submitted to the local planning authority it must be accompanied by a Basic Conditions Statement that sets out how the Parish Council considers that their Neighbourhood Plan meets the Basic Conditions.

11. When considering a Neighbourhood Plan, the examiner will assess whether or not the Neighbourhood Plan meets the Basic Conditions. When an examiner recommends that the Neighbourhood Plan should proceed to referendum (if it meets the Basic Conditions, with or without modifications), the examiner's report must also set out whether the referendum area should be extended beyond the neighbourhood area. Comments made during the current consultation on the submission version of the Neighbourhood Plan, which will be provided to the examiner for their consideration, should therefore address whether the submitted Neighbourhood Plan meets the Basic Conditions and can also address whether the referendum area should be extended beyond the neighbourhood area.
12. SCDC is fully supportive of Parish Councils bringing forward Neighbourhood Plans for their areas, including Fulbourn Parish Council's decision to prepare a Neighbourhood Plan, and officers have been supporting the Parish Council in the plan's preparation. The Council's proposed response to this public consultation on the submission version of the Neighbourhood Plan is set out in Appendix 1.
13. SCDC is supportive of the aims of the Fulbourn Neighbourhood Plan and our comments are intended to help the Plan to be successful at examination as well as delivering policies that are clear in their meaning and are unambiguous in their interpretation. SCDC

recognise the achievement of Fulbourn PC in reaching this stage of submitting their Plan to us for examination.

14. If the examiner is minded to recommend that the Neighbourhood Plan should proceed to referendum, the Council does not feel that the referendum area needs to be extended beyond the designated Neighbourhood Area as the planning policies included in the plan would not have a substantial, direct or demonstrable impact beyond the parish.

Declaration(s) of Interest

Record below any relevant interest declared by any executive Member consulted or by an officer present in relation to the decision.

None

Dispensation(s)

In respect of any conflict(s) of interest declared above, record below any dispensation(s) granted by the Council's Standards Committee.

None

Consultation

Record below all parties consulted in relation to the decision.

Ward Councillors

Other Options Considered and Reasons for Rejection

The option of not sending a response from SCDC was rejected as this Council has a duty to provide advice and assistance to groups preparing neighbourhood plans.

Final decision

To agree the response from SCDC set out at Appendix 1

Reason(s)

The response is intended to provide the independent examiner with SCDC's comments on the Fulbourn Neighbourhood Plan.

Signed	Name (CAPITALS)	Signature	Date
Lead Cabinet Member (where required by the Constitution)	Cllr Tumi Hawkins		10 January 2022
Chief Officer/Head of Service	Stephen Kelly		10 January 2022

Further Information

Appendix 1: SCDC response to the Fulbourn Submission Neighbourhood Plan

Background documents

[Fulbourn Neighbourhood Plan page on SCDC website](#)

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://scamb.smodern.gov.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.