

## Response to SCDC Notes (Jan2022)

Evidence Doc : Examination Comments

Update : 7Mar2022

Version: 5 (Consolidated comments)

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	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.	Implementing the changes suggested by SCDC and others necessitated a restructuring and associated rewriting of parts of the plan. These changes did not however fundamentally change the objectives and were intended to improve the plan.
4	The comments we make now concentrate on matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions.	Noted –
	<b>General overarching comments</b>	
	<b>Fulbourn Conservation Area Appraisal</b>	
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.	We were aware of the CAA and have taken it into account when writing the policy. At the time of production of the Draft Submission, the CAA had not been adopted. We will amend Fig. 2 and Fig. 4 accordingly and update any references as necessary as part of the modifications suggested by the Examiner.

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	<p>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.</p>	
6	<p>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.</p> <p>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.</p> <p>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.</p>	<p>In the same way that the Village Design Guide is cross referenced, but not incorporated to avoid duplication, we thought it unnecessary to duplicate designations made elsewhere.</p> <p>Listed Buildings are shown on Figure 4, but not listed or identifiable to a point to make further searches redundant.</p> <p>The two maps within the SCDC CAA 2021, Fulbourn Conservation Area North &amp; Fulbourn Conservation South show the locations of the various non-designated heritage site but there does not appear to be an associated index to link the list to the location map.</p> <p>The CAA is referenced as a source document and is no more difficult to access within the F.NP Evidence Base than the other source documents used during the production of the report</p> <p>Fig 4, Page 18 could be amended to include Non-Designated Heritage if the source information (GIS points) is made available by SCDC. A list could be included in the Appendix if necessary and provided by SCDC.</p>
	<p><b>Extant planning permissions</b></p>	
7	<p>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.</p> <p>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.</p> <p>For example, that for the Fulbourn and Ida Darwin Hospital sites which are identified for redevelopment in the adopted Local Plan – Policy H/3.</p> <p>We will specify within the comments below for each policy where we consider it appropriate that changes should be made.</p>	<p>It is not the intention of the F.NP to try to retrospectively apply new conditions to planning consent decisions already made.</p> <p>The Village Design Guide (an SPD adopted in 2020) on page 16 provides additional guidance for the sites at Ida Darwin and Teversham Road.</p> <p>The Reg. 14 version of the F.NP has been modified and specific policies related to these two sites removed, with the text only included in the explanatory sections.</p> <p>Should these sites come forward again through fresh applications (not entirely impossible), we would expect that Policy FUL/09 would be applied, as well as other relevant policies and the VDG.</p>

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8	<p>For information here is a list of the relevant planning applications:</p> <ul style="list-style-type: none"> <li>The Ida Darwin outline consented application for 203 dwellings is planning ref: S/0670/17/OL <a href="https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=ZZZY1QOITV905&amp;activeTab=summary">https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=ZZZY1QOITV905&amp;activeTab=summary</a></li> <li>The 'live' Reserve Matters application for this is planning ref. 20/05199/REM <a href="https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=QLH5IEDX0DA00&amp;activeTab=summary">https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=QLH5IEDX0DA00&amp;activeTab=summary</a> It has a status of 'waiting decision'</li> <li>The land east of Teversham Road outline consented application for 110 dwellings is planning ref: S/0202/17/OL <a href="https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=ZZZY1ROITV415&amp;activeTab=summary">https://applications.greatercambridgeplanning.org/onlineapplications/applicationDetails.do?keyVal=ZZZY1ROITV415&amp;activeTab=summary</a></li> <li>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: <a href="https://applications.greatercambridgeplanning.org/onlineapplications/simpleSearchResults.do?action=firstPage">https://applications.greatercambridgeplanning.org/onlineapplications/simpleSearchResults.do?action=firstPage</a></li> </ul>	<p>Where the planning process is still underway and a final decision is yet to be reached then expect that the F.NP, when made, will be suitably applied within the decision making criteria.</p> <p>The Ida Darwin site has got reserved matters approval and has been referred to the Secretary of State.</p> <p>The Teversham Road site reserved matters application has been refused and is now the subject of an appeal.</p> <p>The guideline text from VDG page 16 is already material consideration in the determination of these development. NP policies are intended to support and amplify those provision where possible.</p>
<b>Comments on the draft Plan in plan order</b>		
9	<p>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.</p>	Noted – explanatory text only
<b>3 Planning Policy Framework</b>		
10	<p>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</p>	Fig. 2 can be amended as part of the modifications put forward by the Examiner
<b>4 Local Context</b>		
11	<p>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.</p>	Text can be corrected and integrated as part of the modifications

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	<b>6 Protected Village Setting and Separation</b>	
	<b>Policy FUL/01 Protecting the Distinctiveness and Landscape Setting of Fulbourn.</b>	
12	<p>The supporting text to Policy FUL/1 has undergone much change since the Regulation 14 consultation.</p> <p>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 welcome</p>	Noted – explanatory text only
13	<p>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’.</p> <p>We welcome that Figure 9 is consistent with the current Ida Darwin application.</p>	Cross-reference can be made as part of the modifications
14	<p>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.</p> <p>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.</p>	Noted – we would welcome the Examiner’s suggested modifications
	<b>Policy FUL/02 – Development Outside the Development Framework.</b>	
15	<p>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).</p>	We feel that Part 1 contextualises general Development Framework requirements for the specific situation of Fulbourn, emphasising the need for local character to be considered and the separation from Cambridge to be retained.
16	<p>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.</p>	We assumed that requiring trees and tree belts to be ‘maintained’ would also include tree surveys and removal of dangerous trees as part of new development.
17	<p>Part 2c - The policy mentions ‘appropriate levels of street lighting’ but does not explain in the supporting text what would be appropriate.</p> <p>How would a planning officer know what is appropriate in determining a planning application</p>	Criteria for appropriate level of street lighting is defined in specifications provided by Cambridgeshire CC, RoSPA (for safety) and other technical documents. The aim of the policy is not to provide these technical specifications, but to highlight the need to limit light pollution outside the Development Framework to encourage wildlife, maintain separation from Cambridge and retain dark skies.

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18	<p>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.</p>	<p>Dark skies are championed by the CPRE (Council for the Protection of Rural England) and references to the need of minimising light pollution so that starry nights can be seen. A definition can be added to the Glossary.</p> <p>The reference to “avoiding unacceptable impact” implies that a balance must be struck to identify acceptable levels of light pollution.</p>
19	<p>Part 2d – How would this criterion be achieved to maintain in perpetuity a soft outer edge to Fulbourn?</p>	<p>The intention of the word is to ensure that hedgerows and trees are planted at the edge of development and retained through appropriate maintenance and agreements to avoid their replacement with built fences for expediency. In large developments, for example, planted edges should be part of land maintained through service charges.</p>
<b>7 Enhancing Rural Environment</b>		
20	<p>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.’</p>	<p>Text can be corrected and integrated as part of the modifications</p>
21	<p>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.</p>	<p>Implementing the changes suggested by SCDC and others necessitated a restructuring and associated rewriting of parts of the plan. These changes did not however fundamentally change the objectives and were intended to improve the clarity of the plan.</p> <p>In their comments to the Reg. 14 version, SCDC officers suggested a map to clarify the location of the Green Infrastructure Network. The policy is intended to protect areas within development sites and indicate locations where developers could contribute off-site towards their biodiversity net gain where required.</p>
<b>Policy FUL/03 Creating a Connected Green Infrastructure Network.</b>		
22	<p>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.</p>	<p>Reg.14 Policy FUL/04 contained extensive requirements for development to contribute to on-site and off-site biodiversity, including preservation of important elements of biodiversity. It did not, however, provide a spatial dimension or location of where these things were important.</p>

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	<p>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.</p>	<p>SCDC officers thought that this was a major flaw, and that it would be important to identify where preservation and contributions were most important. As a result we decided to give a spatial dimension to clarify the intention of the policy.</p> <p>We believe that this constitutes a clarification and not a new concept. The policy and map has also been subject to extensive consultation as part of Reg. 16 and therefore opportunity to comment has been widely available.</p> <p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03. Points 4 to 4.4 in the response table</p>
23	<p>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.</p>	Noted -
24	<p>Part 1 of the policy – It is not clear how development proposals could contribute towards the creation of an extended Green Infrastructure network.</p> <p>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?</p> <p>Planning practice guidance notes that planning obligations should only be used where it is:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul>	<p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03. Points 4 to 4.4 in the response table</p>
25	<p>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.</p> <p>It is not clear how the intent of the Policy could be achieved by applying these tests.</p>	<p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03. Points 4 to 4.4 in the response table</p> <p>Figure 11 is based on the concepts for the wider area green infrastructure outlined in the BCN Wildlife Trust Report ‘The Cambridge Nature Network’ (referenced in paragraph 7.4 of the FNP supporting text) for linking the chalk grassland areas to the south of the NDA (Roman Road SSSI) with</p>

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		<p>Fleam Dyke (SSSI), Fulbourn Fen (SSSI) and the low-lying fens (SSSI) to the north of the NDA. It shows some obvious links based on existing green infrastructure, such as footpaths, bridleways, hedgerows, areas of woodland and tree belts, but as projects arise over time it is anticipated that other links could be made possible.</p> <p>Figure 11 our 'green hatching' representing 'Possible New Habitats/Natural Greenspace (Wildlife Trust) has two areas (at Capital Park where there are areas of green space and tree belts and on the Ida Darwin site where a new 'green wedge' is being created as part of the approved planning application) that are not identified by the BCN WT, which should perhaps be identified in a different hatch. The remaining 'green hatched' areas are those indicated by BCN WT in the Report referred to above.</p> <p>Permissive paths, footpaths, bridleways and byways are shown on Figure 11 and these are discussed in Evidence Papers 5, 'Connected Green Infrastructure' and 6, 'Biodiversity in Fulbourn'.</p>
26	<p>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.</p>	<p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03. Points 4 to 4.4 in the response table</p>
27	<p>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.</p>	<p>The maps Figure 11 and 12 show all / most of the items identified in SCDC's comments. These constitute the existing backbone of the Green Infrastructure Network, which is to be enhanced and made more continuous and integrated over time, through development and community initiatives.</p> <p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03. Points 4 to 4.4 in the response table.</p>
28	<p>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'.</p>	<p>See above. We intended that the purple Green Infrastructure Network suggested the need to link and interconnect the identified sites.</p>

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	<p>The terms 'designated green spaces' and 'wildlife sites' are rather vague. Where are the green spaces designated and are the wildlife sites designated anywhere?</p>	<p>The BCN WT maps has arrows to indicate conceptually the need for a link. We preferred an indicative line to provide a clearer location and spatial dimension.</p>
29	<p>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.</p>	<p>Para2 of FUL/03 only requires that future developments do not prejudice the potential to develop an integrated green network. It is anticipated that existing and future planning consents will require developers to adopt suitable environmental measures and this policy identifies the potential green infrastructure as an environmental factor to be considered. The purple ribbons are clearly marked as indicative in the legend and their 'fuzzy' appearance suggests a general location and extent, not absolutely defined one.</p>
30	<p>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.</p>	<p>Please refer to the explanation provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/03, point 4.1 in the response table. Alternative and more appropriate wording welcome.</p>
31	<p>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.</p>	<p>The policy aims to establish a network of green spaces of high biodiversity and wildlife value. This is represented by the purple fuzzy lines.  The green sites are existing sites that contribute already to the G. I. network, and are provided as background information, mirroring the approach of the BCN WT.  'Possible New Habitats/Natural Greenspace (Wildlife Trust) are the sites identified as of value by the BCN WT (with the exception of the two indicated above, point 19).  'Existing Habitats and Woodlands' and SSI are identified by Natural England and are the same as those in &amp;  We obtained habitat maps from the Cambridgeshire and Peterborough Environmental Records Centre, which are shown in Evidence Paper 6,</p>

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		<p>'Biodiversity in Fulbourn' – these are discussed (page 3) and reproduced in Appendix 3 (page 22) of that Paper.</p> <p>We considered that it was important to show areas of existing habitat outside of the NDA to demonstrate the basis for the networks linking to the wider area – there was no intent to have a Policy extending beyond the boundary of the NDA.</p>
32	<p>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.</p> <p>We will need clear boundaries to add into a policies map, so it is clear what areas are within the influence of the policy.</p> <p>Does the use of the term 'indicative' imply the network does not have a clear geographical layout?</p>	<p>The map, Fig11, illustrates the potential integrated green infrastructure includes 'shaded ribbons' to represent the wildlife corridors that by their nature do not have hard-borders.</p> <p>The term 'indicative' has been used, as the networks are based on largely existing green infrastructure as noted above, including hedgerows, footpaths and small areas of woodland, and there are many ways in which these could be enhanced as part of any future development depending on the location and type of infrastructure.</p>
33	<p>Figure 11 – It is unclear from the map what routes are for ecological movements versus those for sustainable transport like walking or cycle routes.</p>	<p>The integrated green infrastructure refers to wildlife and includes the interconnection of woods, hedgerows, ditches etc and its primary purpose is to facilitate the spread and protection of fauna and flora around the area. It will in some areas correspond to footpaths, bridleways, woodland walks etc but its primary function is not to provide recreation; this would be an incidental benefit.</p>
34	<p>Figure 12 – The key to this map is similar to that of Figure 11 but it also includes 'Other green spaces'.</p> <p>Are these protected in the Plan? It is unclear what these areas are.</p>	<p>Fig12, Page55 indicates potential green networks across the village based on local knowledge of wildlife observations and existing hedgerows, woodland, tree belts, water courses, footpaths, the railway line, established gardens and public green spaces.</p> <p>It identifies all green spaces (areas) within the Fulbourn area, some are designated as Local Green Spaces (LGS) or Protected Village Amenity Areas (PVAA), others are not, e.g. the recreation ground, cemetery, etc. All green spaces / areas, (including gardens) potentially contribute to an integrated green infrastructure. Some of the potential links are shown, e.g., in the Pierce Lane area running through established gardens and existing small coppices of large mature trees.</p>

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		<p>In our supporting documentation for new LGSs and PVAAs, which are included on Figure 12, we have described how we believe that these also link into the green networks across the village.</p> <p>These proposed LGSs and PVAAS are detailed on Figure 13.</p>
35	<p><b>Policy FUL/04 Protection and Enhancement of Natural Features.</b></p> <p>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.</p>	<p>Additional text can be added if necessary to the supporting text.</p> <p>Fulbourn, as a fen edge village, has many deep ditches and watercourses. Some are fed by springs, others by water runoff from adjacent fields, or, as in Teversham Road, fed by pumped groundwater in an effort to reduce the water table to prevent flooding in built-up areas at this low point in the village.</p> <p>Some are mainly dry, but all provide capacity in extreme weather events to accommodate the resulting high volume of water. The watercourses that do not dry potentially provide habitat for flora and fauna - water voles and little egrets have been recorded - contributing to the biodiversity of the area.</p> <p>Local Plan Policy CC/8 Sustainable Drainage Systems requires that SuDS are an integral part of all new developments. In Fulbourn it is particularly important that any surface water drainage scheme works with the existing water infrastructure and does not compromise its ability to prevent flooding, prevent pollution, and encourage wildlife.</p>
36	<p>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</p> <p>The NPPF defines a major housing site as being of ten or more or a site with an area greater than 0.5 hectares.</p> <p>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.</p> <p>We would suggest that the Policy would be clearer if the first line made reference to 0.5 hectares as well as 10 dwellings.</p>	<p>Please refer to the comments provided to the examiner on his questions regarding the Integrated Green Infrastructure and Ful/04. Points 5 to 5.2 in the response table</p>
37	<p>Part 3a – How does this link to the new policy FUL /03 that creates the Green Infrastructure?</p>	<p>The green infrastructure preservation and enhancement referred to in Part 3a is that within the proposed development site. We would welcome suggestion to improve clarity of this point.</p>

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	<p>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?</p>	
38	<p>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.</p>	<p>The intention of this point is to encourage creation of Natural Greenspace even outside the areas identified by Policy FUL/03. Additional green links will always be welcome. The reference to Natural England's definition is provided: ENRR526.</p>
39	<p>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.</p>	<p>Noted – reference can be added</p>
40	<p>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:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul>	<p>It is expected that for the development of some sites of already high biodiversity value, it will be difficult to achieve a 10% gain on site. Developers may want to identify off-site locations, which will need to be secured by agreement. It is important that these contributions are located within the Parish and ideally at a mutually agreed location to maximise benefits to the G.I. network.</p>
41	<p>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.</p>	<p>See above</p>

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42	<p>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.</p>	<p>It was anticipated that these fundamental requirements would be included in the evidence and environmental studies required to support any planning consent and the processes already in place would monitor compliance.</p> <p>We are not sure that the Parish has the sufficient technical expertise to specify the contents of surface water studies and flood risk assessments. It is for the planning officers and the Environment Agency to satisfy themselves that appropriate studies have been undertaken.</p> <p>These reports should also take account of climate change, and a likely future rise in the local water table, resulting from a reduction in the abstraction rate at the Fleam Dyke pumping station, following the implementation of a nature recovery programme.</p>
43	<p>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."</p>	<p>Agreed.</p>
<p><b>8 Local Green Spaces and Amenity Areas</b></p>		
<p><b>Policy FUL/05 Local Green Spaces and Protected Village Amenity Areas</b></p>		
44	<p>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.</p>	<p>The sentences have been included for clarity and make an important reference to 'discussion with the community'.</p>
45	<p>Part 1 – In the first sentence delete the unnecessary 'a' after designated as.</p>	<p>Noted – typo</p>
46	<p>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.</p>	<p>We are grateful for the input provided by SCDC and are pleased to have included the 3x additional LGSs associated with the Fulbourn Hospital site.</p>
47	<p>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.</p>	<p>The proposed boundaries for the LGSs of B,C &amp; D take into account, and exclude, the areas currently being developed.</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<p>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)</p> <p>Also, the Fulbourn hospital site has a development brief that includes some sites for development within the areas proposed as LGS.</p> <p>We have concerns therefore at the proposed boundaries and how these might impact the development of these sites.</p> <p><a href="https://scamb.moderngov.co.uk/documents/s73905/Development%20Brief.pdf">https://scamb.moderngov.co.uk/documents/s73905/Development%20Brief.pdf</a></p>	<p>We are very concerned should there be any further loss of the overall parkland setting of either Capital Park or Fulbourn Hospital in an area of Green Belt, where intensification should not normally take place.</p>
	<p><b>9 Village Character</b></p>	
	<p><b>Policy FUL/06 – Protecting and Enhancing Village Character.</b></p>	
48	<p>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.</p> <p>For example, criteria c in this policy about trees and hedgerows is already referred to in part in 1d of Policy FUL/04.</p> <p>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.</p>	<p>Agreed – corrections can be made following the Examiner's recommendations</p>
49	<p>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?</p>	<p>FUL/06 lists out elements that, together, create local character. The cross reference was provided to indicate that details were provided elsewhere.</p>
50	<p>Parts 2c – This appears to be repeating the requirements in Part 1d +1e of Policy FUL/04 regarding trees?</p>	<p>As above, the list indicates the elements that, together, form local character.</p>
51	<p>Part 2d – This criterion previously had 'diverse' built frontages which has now been replaced by 'fragmented'.</p> <p>We still have concerns about how such terms could be interpreted.</p> <p>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?</p>	<p>This was to try to describe that village edges are traditionally organic and unstructured – they normally do not present a hard wall-like effect. Creating a wall-like frontage on the countryside is becoming increasingly common as developers want to capture the value of views over the countryside. This would destroy the setting of village among trees that Fulbourn has.</p> <p>The term 'fragmented' could be included in the glossary or replaced with 'diverse' if that is thought to be clearer.</p>
52	<p>Part 3 – We remain concerned about an unduly heavy emphasis on contemporary design in policies FUL06 and FUL/07.</p> <p>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.</p>	<p>Th F.NP is of the view that encouraging contemporary design is better than pastiche, which often uses superficial and inappropriate historic references out of context.</p> <p>Ful/06 Para3 Page 71 rewritten as follows;  <i>A creative and contemporary response / approach to design in respect form, material, massing, height and detailing will be encouraged taking into</i></p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<p>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.</p>	<p><i>account local character and where this would not negatively impact on designated and non-designated heritage assets.</i>  <i>In areas which do not reflect the essential village characteristics of Fulbourn, new development should seek to improve the appearance of the area in accordance with the guidance set out in the Village Design Guide'</i></p>
53	<p>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.</p> <p>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.</p> <p>We question whether this level of prescription in design is consistent with local plan policy or national planning guidance.</p>	<p>See above, and Village Design Guide – both describing what is considered appropriate in Fulbourn.</p>
54	<p>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".</p>	<p>The word 'negatively' can be added for clarity.</p>
55	<p>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.</p> <p>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).</p>	<p>The F.NP does not seek to replicate information available in documents that should be familiar to both officers and applicants for development.</p> <p>Fig. 4 could be amended to include NDHA if the relevant GIS information is provided together with a list for the Appendix.</p>
	<p><b>Policy FUL/07 Building and Landscape Design</b></p>	
56	<p>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.</p>	<p>Noted – explanatory text only</p>
57	<p>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".</p>	<p>Agreed</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
58	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.	The word 'similar' was used to recognise that there might be some difference, but not a markedly different one. The intention is that a building designed to have habitable rooms in the roof area should be more similar to a 2 storey building with an unoccupied roof than a 3 story building with an unoccupied roof.
59	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.	It is considered helpful to have a reference to densities in this policy. The policy also adds reference to a maximum of 30dph 'in any particular part of the development' rather than average.
60	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.	During study tours with SCDC at the time of the Village Design Guide, we saw 'developments of village style' where the interpretation of village architecture was an incoherent mix of bricks, wood, renderings of different colours and 'villagey' details. Buildings in Fulbourn are simple in character: one material for the walls and one for the roof. Planting is prominent.
61	There are two sections within this policy numbered 2. This will need amending	Amend the paragraph numbering error as currently two 'part 2'. Affects all subsequent paras
61b	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?	It is considered helpful to have these criteria as so many of the applications in the village are for alterations and extensions. The main objective here is to see extensions as an opportunity to add quality and character, particularly in those areas built between the 40s and 70s, when a single building type was repeated over and over.
62	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.	Noted - Examiner's recommendation
	<b>Policy FUL/08 – Village Street and Lane Layout</b>	
63	Part 2d – Planning policy does not have control of signage – this would be a highway matter.	Word can be removed
	<b>10 Residential development</b>	
64	Paragraphs 10.2 -10.3 - The introduction to this chapter has been much	Noted - Examiner's recommendation

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<p>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.</p>	
65	<p>Paragraph 10.7 for clarity it should be stated that it was Cambridgeshire ACRE that carried out the survey not Cambridge.</p>	<p>Noted - Examiner's recommendation</p>
66	<p>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)</p>	<p>The points made by SCDC are noted. We would welcome guidance on this point, as we were encouraged to remove the sites from policy, as they already had planning permission and policy was not to be introduced retrospectively affecting these sites. If we were to include the guidance of the Village Design Guide as policy, this might be the case. See SCDC comments at point 7, 8 and 29. Examiner's recommendation welcome</p>
	<p><b>Policy FUL/09: Larger Residential Development (10 or more units)</b></p>	
67	<p>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</p>	<p>The community feels that the provision of accessible and adaptable units for the village ageing population is essential. Requiring that at least 1 unit (5% rounded up) in developments of 10 units and 10-12 units in developments of 200-250 unites (i.e. the scale of Ida Darwin/ Teversham Road) is reasonable and justified by local demographics and therefore needs. Examiner's recommendation welcome</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
68	Part 1b – We consider that this criterion simply repeats the Local Plan policy on affordable home (Policy H/10).	We considered important to reinforce this requirement.
69	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.	Supporting text could be added. Appraisal system could be agreed by the local planning authority with the support of the Parish Council (who is better aware of specific local needs)
70	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.	The VDG deals with design quality / character and context specifically for Fulbourn.  Guidance on design for healthy living and sustainable development is evolving. The intention of the policy was to encourage use of a suitable assessment tool to demonstrate that the development will encourage healthy and sustainable lifestyles.
71	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	Noted.  We would prefer to include some reference to sustainable energy in the policy to draw applicants’ attention to this at an early stage in the preparation of any proposals
72	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?	Noted.  We thought it important to include some reference to wetland conditions as this is a specific characteristic of the location which demands an informed and early design response as part of the approach to the development. It is not just a landscape issue.
73	Part 3b – This criterion repeats the policy included in the Local Plan – Policy CC/8: Sustainable Drainage Systems.	This point adds stronger reference to long term protection and future proofing for climate change

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
74	Part 3c – Does this criterion add any value as other policies within the Plan cover this issue – FUL/01; FUL/04.	<p>Ful/01 and Ful/04 deal with the setting of Fulbourn within its rural environment.</p> <p>Ful09 part 3c deals with the character of specific developments.</p> <p>Whilst there is clearly a close relationship they are separate, one being wide-area the other being development site specific.</p>
75	Part 3d – This is repeating an existing policy in the Plan – FUL/03	<p>Ful/03 deals with the setting of Fulbourn within its rural environment.</p> <p>Ful09 part 3d deals with the character of new developments. Whilst there is clearly a close relationship they are separate, one being wide-area the other being development site specific.</p>
76	Part 3e – This is repeating Policy FUL/01	<p>Ful/01 deals with the setting of Fulbourn within its rural environment.</p> <p>Ful09 part 3e deals with the views to and from new development. These are not identified in the earlier policies.</p>
77	<p>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:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul> <p>A developer could not be required to contribute to strengthen existing facilities for the village as a whole.</p>	<p>This point is mirrored in FUL/14.3.</p> <p>See response to Examiner’s note (point 11.2).</p> <p>The point refers to contributions to community facilities that developers are required to do and are typically secured via S106 or CIL – clearly not an additional provision. For example: expanding the existing community halls in the centre of the village, rather than building a new one inside a development at its periphery.</p>
78	<p>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.</p> <p>It is unclear whether this requirement is set out in the Plan and supported by evidence for such requirements</p> <p>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?</p> <p>It is suggested that “in response to the requirements set out by Fulbourn Parish Council” is deleted from the policy.</p>	<p>Noted – Examiner’s recommendation welcome.</p> <p>The intention was to highlight that the Parish Council manages many of the community facilities in the village and is aware of what has spare capacity and what falls short.</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<b>Policy FUL/10 Rural Exception Sites</b>	
79	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.	See response to Examiner's Note (point 9)
80	Part 1d – This repeat what is already in Policy FUL/01 and FUL/04.	Exception sites by their very nature challenge the boundaries and setting of the village. It is very important to clearly state that, should they occur, they must not have an adverse impact on the setting and relationship of the village and countryside.
81	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.	We believe that there is merit in retaining this point as there is no demonstrable need for provision of additional affordable housing in Fulbourn. So there is no need to encourage landowners to release land for further development in the Green Belt.
	<b>Policy FUL/11 -Housing Design Quality</b>	
82	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.	Additional justifications can be provided in the supporting text to justify inclusion of particular standards, if the Examiner's thinks it is necessary. This could include specific references from the VDG where appropriate or otherwise write explanatory text to cover other points not specifically raised in the VDG.  Having aspirations for good quality housing in Fulbourn should be the norm.
83	Part 1b; 1f; 1h; 1i - These appear to be new criterion included in the Plan since the Regulation 14 consultation.	Noted - Examiner's recommendation welcome
84	The inclusion of criteria that support sustainable construction – 1a, 1b and 1c is supported.	Noted
85	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.	Car parking is included here as one element of holistic design that includes various aspects and not simply a functional requirement. Local Plan Policy TI/3 stated 'design-led' approach, which is rather vague. The NP policy makes specific reference to avoiding dominating the street scene.
	<b>11 Employment</b>	

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<b>Policy FUL/12 – Employment Development</b>	
86	Part 1 – The first part of this section is simply repeating the Local Plan Policy E/12.	See response to Examiner's Note point 12.
87	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?	Yes - in accordance with Policy FUL/16  The impact of employment transport on the village is very significant, and any development (regardless of scale) should take this in consideration. It could be a small cleaning business with dozens of vans – for example.  Not all scales of development would require a TA. But all should demonstrate how they will manage their operations in the context of the constraints of the village.
88	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.	The existing F.NP text, Part 1b of Ful/12 does refer to a transport assessment.
89	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.	Heavy Goods Vehicles (HGV) should be used instead of heavy vehicle to avoid confusion.  We believe that it is appropriate for the policy to restrict employment development only to the types whose adverse impacts on the village can be mitigated.
90	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?	It is felt that the car-parking and transportation requirements of a business needs to be considered as part of the planning for the establishment of a business at a village location. This point aims to discourage paving over of gardens and creation of street facing parking yards.  Part 1d of the policy explains what a design-led approach to parking (Local Plan Policy TI/3) means in Fulbourn.
91	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.	Heavy Goods Vehicles (HGV) should be used instead of heavy vehicle to avoid confusion.  Village Development Framework could be used as an alternative to village boundary, but perhaps it would be better to say the extent of the village built

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<p>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’.</p>	<p>up area (as development framework is not specifically intended for road use).  The term ‘regular’ was used to refer to the movement of heavy goods vehicles as an integral part of the business rather than incidental vehicles that might occasionally visit.</p>
92	<p>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.</p>	<p>Noted. But a transport assessment is required as part of the planning application: an assessment of additional traffic through the village is required as part of the TA.</p>
93	<p>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?</p>	<p>The word ‘adequate’ is not necessary for the understanding of the paragraph so could be removed.</p>
	<p><b>Policy FUL/13 Large Employment Sites</b></p>	
94	<p>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.</p>	<p>Fig. 5 in the Context section of the NP indicates the location of large employment sites. As these are not ‘allocations’, it was considered inappropriate to include a map identifying them in the Policy section. It could be cross-referenced.</p>
95	<p>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.</p>	<p>The intention of the policy is clear – and obviously is not intended to require a TA for a porch extension or similar development. Examiner’s recommendations welcome.</p>
96	<p>Part 1 - The Plan does not need to mention that employment development should comply with relevant policies in the Local Plan.</p>	<p>Noted</p>
97	<p>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.</p>	<p>Government policy is changing rapidly. DfT is publishing a new Manual for Streets, Decarbonisation Plans, requirements for zero carbon transport etc. These will keep changing requirements over the coming years and it is not possible to anticipate. DfT might also change its name. A Department for Active Travel has just been created....</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
		Perhaps add: 'government recommendations and accepted best practice'?
98	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.	This refers to the monitoring of operations and travel plans in line with a TA
	<b>12 Community Facilities</b>	
	<b>Policy FUL/14 –Community Facilities</b>	
99	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)	See comments on Examiner’s Note point 11
100	Part 2 – It is not necessary to include the wording after (see Figure 19) relating to standards required by Sport England.	Noted – Examiner’s recommendation
101	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.	See comments on Examiner’s Note point 11.1
102	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.	See comments on Examiner’s Note point 11.2  It is helpful to stress the importance of enhancing existing facilities as a 'preferred option' – not the only one.
	<b>Policy FUL/15 –Healthcare Facilities</b>	
103	It has not been clearly stated in the Plan whether the current GP practice and / or the Local Health 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.	The policy aims to support the enhancement of the existing facility and protect the site for redevelopment – in line with discussions undertaken with the GP practice.  Enhancement may emerge as a project independently of developers’ contributions (which have not been made available through the two large sites recently consented).  Retaining GP services is an important matter for the village.

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
	<b>15 Delivery Priorities</b>	
104	<p>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.</p> <p>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.</p> <p>This Delivery Priorities list is therefore a helpful guide to the District Council when considering viability as part of the decision-making process.</p>	Noted – explanatory text only
	<b>Appendix 2 - Trees</b>	
105	<p>A new appendix has been added to the Plan including a list of native, specimen and ornamental trees which are considered appropriate for Fulbourn.</p> <p>It is not clear who decided upon the trees to be included in this list?</p> <p>Our Trees officer has no issues with the species choice but would not recommend limiting new tree planting to only species in the list.</p> <p>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.</p> <p>This appendix may need updating regularly to reflect the changing climate.</p>	<p>At the Reg 14 Consultation on the Pre-Submission Draft NP, SCDC raised concerns about the clarity of terminology used relating to trees e.g., 'native', 'indigenous' &amp; ornamental', and from subsequent discussions it was decided to prepare an indicative listing of trees as guidance for tree selection in new development and this has been included at Appendix 2 in the Reg 16 Submission version of the NP.</p> <p>This list was prepared by the 'Environment Sub-Group' of the NP Steering Committee on behalf of the Parish Council, taking inspiration from websites such as that of the Woodland Trust and a recent publication from NHBC on 'Biodiversity in New Housing Developments', which was co-authored by the RSPB.</p> <p>The existing tree cover in Fulbourn is regarded as a key contributing factor to the distinctive character of Fulbourn, as noted in the Fulbourn Village Design Guide SPD (2020). These are predominantly native trees with some European tree species commonly planted in the UK, which has influenced the listing. However, the list is presented as 'guidance' in the introduction to the Appendix rather than a prescriptive list.</p> <p>In 'Appendix 2' and the supporting text of the NP, paragraph 7.10, it is acknowledged that factors such as local settings, soil type, annual rainfall,</p>

Ref'	Notes from SCDC Jan2022	F.NP Responses & Notes
		<p>climate change and the incidence of tree disease in the area need to be considered when making choices.</p> <p>Also, in Evidence Paper EP6 it is acknowledged that some non-native species may be of benefit to wildlife while posing little current threat to the environment and hence some examples are included in the list as a guide. The basis for the list is explained in more detail in Evidence Paper EP6, Biodiversity in Fulbourn. It is noted that the Appendix may need updating in future to reflect the changing climate and the incidence of new diseases.</p>
106	If the list is to be retained, then all trees must include their botanical name to avoid confusion.	The Parish Council believes that this list in Appendix 2 will provide useful guidance on tree choice for new developments in Fulbourn and is willing to update the list to include botanical names if required.
	<b>Appendix 3 – Glossary</b>	
107	Biodiversity Net Gain is included in the glossary – the reference to the Environment Bill (2020) needs to be updated to the Environment Act 2021.	Agreed