

## Fulbourn Neighbourhood Plan: Regulation 14 Pre-submission Draft

### Response from South Cambridgeshire District Council – February 2021.

1. The following response from South Cambridge District Council is intended to provide constructive assistance for the Fulbourn neighbourhood plan team. SCDC has worked closely with Fulbourn Parish Council (PC) as they have been preparing their plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. We have had several meetings with the neighbourhood plan team to discuss the plan as it has evolved. SCDC has provided practical comments to the team at these meetings followed up by detailed notes to assist them in their plan making.
2. The comments we have made on your Plan are provided in two sections –
  - General overarching comments about particular issues that relate to your Plan as a whole
  - More detailed comments in Plan order on each policy and its supporting text.
3. To assist the plan team we have considered whether the comments we have made throughout this response are identified either as matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions or as matters that would help the ease of use of the Plan. Those comments relating to meeting the Basic Conditions test are identified as follows – (BC test) and the other comments as (Non-BC test).

### General overarching comments

#### Clear, unambiguous policies (BC test)

4. Once your neighbourhood plan has been successful through examination and received a favourable vote at referendum it will become part of the statutory development plan for South Cambridgeshire. The Plan will then be used in determining planning applications in your parish. The on-line national planning practice guidance states that policies in a neighbourhood plan should be clear and unambiguous and be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications<sup>1</sup>. Developers, members of the local community and others submitting planning applications; development management officers and members at South Cambridgeshire District Council considering these must be able to know through the policies in your plan what the aims and objectives are and what you wish to achieve through your plan. Your policies must be workable and clear.

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<sup>1</sup> (Paragraph: 041 Reference ID: 41-041-20140306)

5. In reading through your plan, we are aware that there are some policies which do not have this clarity. There is a risk that if planning permissions were to be shaped and determined in line with these policies the future development may not achieve what the parish council in preparing the plan had intended. There should not be room for a reasonable person to be able to misinterpret your aspirations. There is also the possibility of legal challenges to the exact wording of policies where they fail to provide clarity.
6. To test the usability of your policies you may wish to look at recent planning applications within your parish and see whether you are able to assess these applications against your policies. Are they implementable? It may help to have others who have not been involved in writing a particular policy to carry out this task.

### Policies Map and Figures (BC test)<sup>2</sup>

7. The maps in your Plan are well presented but are too small scale to show the whole parish especially for those unfamiliar with the village. Whilst we can see that you have included in Figure 7 a summary map of all the strategic neighbourhood plan designations this is not of a sufficient scale to clearly show the boundaries of designated sites. Although it is acknowledged that a single Policies Map is not a requirement for a Neighbourhood Plan, SCDC considers that, for a Plan area like Fulbourn, such a map helps in providing clarity to those policies that include site allocations and site-specific issues. Practitioners generally find it useful to go to a single point for land related designations, such as in a Policies Map with more detailed Inset Maps for areas where there are a number of policy designations, rather than have a number of maps to look at that are dotted through a Plan. For example, Policy FUL/02 'Protecting the Setting of Fulbourn' refers to important views shown in Figure 5, but this map is not next to the policy. Figure 8 is on an adjacent page but not referred to in the policy. Figure 7 showing the strategic neighbourhood plan policies also shows the views but is not reference. This is not helpful for a future user of your Plan.
8. You may wish to consider having larger scale maps to cover the whole of your parish to provide a comprehensive Policies Map – maybe at A3 scale so that it is easy to read. Alternatively, you could consider the approach used in our Local Plan Policies Map where individual villages can be covered by several A4 maps at legible and easy to read scales. This format has the added advantage of having maps of the village in a portrait format which is easier to read than having landscape ones for any future user of the plan.
9. The map base used throughout your plan is very pale which results in surrounding features such as roads and buildings being difficult to identify particularly if an area is overlaid with a colour – such as on Figure 8 where the Green Belt shading almost covers the whole map. Combine this with the small scale then further overlays make it difficult to see a clear boundary- e.g. Do the sensitive fields shown in Figure 8 to the west, south and east of the

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<sup>2</sup> Comments relating to meeting the Basic Conditions test are identified as follows – (BC test) and the other comments as (Non-BC test).

built up area of the village follow field boundaries or are they illustrative only? This is further overlaid with a key visual gap to be retained to the west, but boundaries are unclear/vague at this scale and with this colouring. Without clarity the policy to protect these features cannot be achieved.

10. When a policy area or boundary is shown on a map in your plan it is important in the key to refer to the relevant policy number in your plan. Figure 7 has a mixture of Local Plan and Neighbourhood Plan policies which could be confusing unless the future user is familiar with both plans.
11. The NPIERS guidance<sup>3</sup> on examinations also mentions the importance of mapping in a neighbourhood plan. It sets out that the qualifying body should check the following prior to submitting a Plan to the local planning authority (Page 29):
  - 1.7.2. *Plans should be supported by clear mapping, including:*
    - *Accurate delineation of the boundaries of the plan*
    - *The boundaries of any site allocations, and designations made in the plan (preferably including street names).*
12. All maps need to ensure that they have the required copyright permissions which needs to be correctly worded especially when you are using OS maps- the copyright and licence information must be clearly readable. We note that you have a statement on page 3 referring to copyright but would prefer each map to contain this copyright information clearly to avoid any confusion.

#### **Village Design Guide Supplementary Planning Document (VDG SPD) (BC test)<sup>4</sup>**

13. The Fulbourn Village Design Guide was adopted as a supplementary planning document by SCDC in January 2020. We consider that more should be said about this document rather than it being briefly summarised in paragraphs 3.13-3.15. To add weight to proposals and guidance included in your VDG you should be highlighting key ideas within your Plan. A neighbourhood plan has greater weight in determining planning applications than an SPD. Whilst key considerations can be cross referred to within policies it would be very helpful for the future user of your Plan to incorporate policy wording of those that you consider very important actually within the Plan. A busy developer or planning officer would prefer to only have to consider one document rather than having to find what is in another. It could help to achieve the aspirations contained within the SPD. It will, in our view, be a missed opportunity to not formally weave the findings of the SPD into the Plan. You are in the fortunate position to be able to have the opportunity to include key aspects of the VDS within your Plan to give it added weight.

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<sup>3</sup> NPIERS Guidance to service users and examiners - <https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/regulation/drs/drs-services/npiers-planning-guidance-to-service-users-and-examiners-rics.pdf>

<sup>4</sup> Comments relating to meeting the Basic Conditions test are identified as follows – (BC test) and the other comments as (Non-BC test).

## **Fulbourn Conservation Area Appraisal – draft (BC Test)**

14. In parallel with this pre-submission public consultation of the Plan SCDC is carrying out a consultation on the revised Fulbourn and Fulbourn Hospital Conservation area appraisal between 18 January and 15 February 2021. This appraisal once adopted will need to be mentioned within your Plan. The draft 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. You may wish to consider adding a policy into your Plan about such buildings to add weight to their protection, cross referencing to the Appraisal which is where the evidence to support their designation will be found.

### **Accessibility (Non-BC test)**

15. Any documents that are published in future on the South Cambridgeshire website must be accessible to all. We can share with you the current guidance that has been provided to us by our Communications Team at South Cambridgeshire. The current Regulation 14 consultation of your Plan is available from your website. But you will need to be aware of the accessibility requirements once your Plan and all its associated documents is submitted to South Cambridgeshire as they will all need to be published on our website and therefore all need to be accessible.

### **Glossary (Non-BC test)**

16. We welcome the fact that you have included a glossary in your draft as this a good idea to help to explain any planning jargon. However, it currently does not include many terms. We had suggested in comments on an earlier draft of your Plan the glossary should be enlarged to include more terms that non-planners may not be familiar with. You can consult the National Planning Policy Framework glossary and that in our South Cambridgeshire Local Plan to help you create one for your Plan.

### **Evidence documents (BC test)**

17. All policies included in your Neighbourhood Plan must have proportionate and appropriate evidence to back them up. We note that with the draft Plan that was sent to us you had included an appendix listing much evidence documents which I am sure contains a wealth of information. Your Plan as drafted sometimes does not include enough justification within supporting text to policies to explain why such policies are included in your Plan. You may wish to include more evidence to help to tell the story of the area. It is a delicate balance between providing too much detail in the Plan but then not having an explanation as to why a policy has certain criteria within it that a planning application would have to be determined against.

18. The way that you have references to all the evidence documents throughout the Plan does not make for an easy read and is not necessary.
19. You have included as Appendix 1 to your Plan a comprehensive list of all the evidence documents. This is much too detailed for inclusion in the Plan and it's recommended that, if it's considered necessary to include a list of evidence documents then it is restricted to those that have been prepared as part of the preparation of the Plan.

### **Structure of your neighbourhood plan and its story (Non-BC test)**

20. The best neighbourhood plans tell a story. It helps if it highlights your overall vision and objectives from which the policies will flow.
21. The overall appearance of your Plan is pleasing to a user and you have obviously given this much thought creating a document that people will want to read. It has a distinct style. You have put some of the information into visual charts which makes it easier for the user to be informed of the facts. We are sure that there are historic maps and photos of your parish that could, should you wish, add to helping a user understand the character and development if they are not familiar with your parish.
22. Whilst we appreciate that those that have written the Plan know Fulbourn parish very well, future users of your Plan are unlikely to have this same local knowledge. Your Plan mentions many facilities and places that are important, but it is not always clear as to their location. Where specific locations are mentioned your Plan would benefit from having a map showing where these are in the parish or a clear address. A developer putting together a scheme for development in Fulbourn may not know where Pound Green is or The Swifts or particular facilities such as shops are in relation to their proposal.
23. Throughout your Plan at the start of each chapter you have a section that seems to summarise the contents of this chapter. It almost seems as if you are quoting from another document? We like that style, but does it perhaps need a heading of explanation?

### **Comments on the draft Plan in plan order**

24. 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

#### **1. Introduction**

25. Section below 1.9 should have a paragraph number so that it can easily be referred to. (Non-BC Test)

26. The Engagement Log is referred to in paragraph 1.13 as Appendix 2. This appendix now contains the Glossary. There are only two appendices with no engagement log. Paragraph 1.13 – 1.14 need updating. (Non-BC Test)

## 2. The Plan Area

27. Figure 1 shows the Designated Neighbourhood Area for Fulbourn and is at such a small scale and has such a pale background it is difficult to read. It would help if a whole A4 page was allowed for this map so that the boundaries of the Neighbourhood Area are clearly defined. There should be no doubt to future users of the Plan as to where the policies of the plan apply. This is especially the case where the boundary includes the Teasel Way development on the edge of Cherry Hinton in Cambridge. (BC Test)
28. It would help to place Fulbourn within its surroundings if you were to annotate Figure 1 or include an additional map that shows the area surrounding Fulbourn identifying parishes for those who may not be as familiar with this area as you are. (Non-BC Test)
29. Throughout the Plan you refer to the 'Neighbourhood Plan Boundary'. We have usually used the term 'Designated Neighbourhood Area'. It would make for consistency if all the neighbourhood plans in South Cambs used the same term so that there is not room for confusion. (BC Test)

## 3. Planning Policy Framework

30. Paragraph 3.1-3.6 - Your Plan does not need to include so much detail about the National Planning Policy Framework especially the mention of recent consultations such as the 'Planning for the Future' White Paper. The Government regularly publishes initiatives relating to planning and your plan does not need to mention them all. (Non-BC Test)
31. In the section on the South Cambridgeshire Local Plan (paras 3.7 – 3.10) only some relevant policies are highlighted. There is always a danger of just highlighting some as if the others are of lesser importance. We consider a better method is to reference the relevant Local Plan policy in the supporting text to the specific neighbourhood plan policy that it links to. (Non-BC Test)
32. Figure 2 We have already mentioned our concerns about the scale of the maps and the pale background of the base layer map. If you are using the policy designations from the Local Plan you must use the correct terms so as to avoid confusion for the different designations e.g. Village Amenity Area should be Protected Village Amenity Area. (BC Test)
33. Emerging Local Plan – Paragraph 3.12. This section should be updated as the [Local Development Scheme](#) was revised in July 2020. (BC Test)

34. Other Relevant Planning Documents – Top of page 14 – This list does not need to be included in your Plan. Your plan can incorporate key elements relevant to your village. (Non-BC Test)

#### 4. Local context

35. This section would come alive if there were historical maps or photographs to illustrate the character and landscape setting of the parish. Much of the description relies upon local knowledge of how the village fits together. It would help to include a map showing the key buildings in the parish. (Non-BC Test)
36. Paragraph 4.7 –The heritage team at SCDC thought that your Plan could say a little more about the original hospital and its grounds and their history. Their historical significance is worth emphasising at this point. Had you considered this? (Non BC Test)
37. Figure 3 is entitled ‘Approximate Business Locations’. Should approximate be deleted or is this indicating that locations for the different features shown on the map are not accurate? The key refers to ‘Community Services, shops and businesses but there is no clear definition of how to differentiate between these different uses. The map shows numerous blobs which give no indication of scale – whether it is a business park or a single workshop/ office. It is clear where all the shops are since these merge together. It would help to have an inset map of this section of the village. Are the Community uses the same as those listed from a-n in Figure 6? The map does not help the user of the plan understand business locations. (BC Test)
38. Paragraph 4.20 – Mention is made of three industrial sites outside of the development framework – it would help to have an inset map showing these sites for future users of the plan who are unfamiliar with the parish. (Non-BC Test)
39. Figure 4 Heritage. It would be helpful if the listed buildings were not shown as circles but rather by their property boundaries to avoid confusion of their location. (Non-BC Test)
40. Landscape setting and Relationship with the Countryside – This is another section which would greatly benefit from an annotated map showing where all the key features, buildings and roads are located within the parish. There is too much reliance on local knowledge. (BC Test)
41. Paragraph 4.24 – In the third sentence there is a spelling mistake – richness of tress should read ‘trees’. (Non-BC test)
42. Figure 5 – It would be helpful to know where Fulbourn Fen Nature Reserve is on this map and Fleam Dyke. There are many different types of habitat listed in the key – a link could be provided to the definition of each on the Natural England website and to the Forestry Commission Inventory. This also includes a type called Coastal and floodplain grazing marsh – is coastal a correct category for Fulbourn or is the relevant element ‘floodplain grazing marsh’? We

are not sure of the value of showing the different types at such a scale. (Non-BC Test)

43. Figure 6 Existing Community Facilities – What does the purple diamond symbol stand for? Are these the Assets of Community Value? Should the boundaries of the recreation ground, Fulbourn Fen Nature Reserve and the allotments be shown rather than just a diamond? Is ‘m’ included on the map? (Non-BC Test)
44. Chapter 4 leads to chapter 5 about the neighbourhood planning policies. The bold title at the top of page 26 confuses as it looks like a heading for the next chapter and it is not but rather a section break. – slightly odd style. (Non-BC Test)

## **5. Vision and Objectives**

45. Section under the Vision Statement on page 28 – The paragraph numbering has slipped here. (Non-BC Test)
46. Chart 3 – The Golden Thread is a useful table showing how the objectives will be delivered. For accessibility purposes the formatting of this table would have to be amended as it has merged cells which cannot be read online by those with disabilities. (See paragraph 15 accessibility) (Non-BC Test)
47. Figure 7- Summary Map of Strategic Neighbourhood Plan Designations - Is there a definition of what “strategic” means? Generally, neighbourhood plans do not make strategic policies and so it might be appropriate to use a different term? Is this map illustrating all the land use policies of the Neighbourhood Plan? It would be helpful if the relevant NP policy references were added to the key. It is strongly recommended that the map is a minimum of A4 size with a separate key or maybe even split into two A4 maps (east and west) or more if appropriate in order that the sites and boundaries can be defined more accurately. It would help if where local plan policies are to be used to designate sites in the neighbourhood plan that a similar symbol is used e.g. the symbol for important countryside frontage in the local plan is a row of brown triangles. It would avoid confusion for future users of your plan. (BC Test)
48. Looking at the designations shown on Figure 7 there are many protecting the setting of the parish. Also Fulbourn is as your Plan makes clear, within the Green Belt. A neighbourhood plan should not be overly protective as it needs to consider opportunities for future development. We would question the extent of the countryside frontages and sensitive fields to the east of the village which would restrict any future development. It is possible to have development that is sensitively designed to protect views into and out of the village. (BC Test)

## **6. Protected Village Setting and Separation**

49. Paragraphs 6.1-6.4 supports the retention of the Green Belt around Fulbourn, but this is not in the gift of the neighbourhood plan to change as this is a strategic issue. The NPPF does now allow neighbourhood plans the opportunity

to redraw Green Belt boundaries but there needs to be a strategic policy in the Local Plan to facilitate this. If the parish council feels strongly about this retention it would be best to take the opportunity to make representations to this effect in future consultations of the Greater Cambridge Local Plan. (Non-BC Test)

50. Paragraph 6.5a – There is currently a live discussion about the [Ida Darwin planning permission](#) with submission of details required by conditions including that for design statements. Policies in your neighbourhood plan cannot override an extant permission for this development. (BC Test)
51. Paragraph 6.9 – 6.10 The Plan cross refers to the Village Design Guide SPD. We consider that there should be a section in your Plan summarising the key elements from the SPD. Future users may decide to not look through the SPD as well as the neighbourhood plan. If the key views, specific fields, important countryside frontages and local landmarks from the SPD are important then there should be a clear list of each included in the Plan. It would be beneficial for each specific feature to be listed within the relevant policy so that a developer or development management officer could refer to a particular view in their report about any development proposals – e.g. View A to the Windmill ...or view C towards St Vigor’s Church. Or Sensitive field H north of xx Road. (Non-BC Test)
52. Paragraphs 6.4-6.5 You could emphasise here the importance of the parkland element of the Fulbourn Hospital conservation area (both present hospital and Elizabeth House sections) in maintaining the ‘separation’ of Fulbourn village.(Non-BC test)

#### **Policy FUL/01 Respect for Local Character and Local Setting**

53. It maybe helpful to consider the comments in this report (para 48) as to whether this is the best way to incorporate the SPD into the Plan. (BC Test)
54. We suggest that you add at the end of this policy ‘ and any document that supersedes’ to take into account that the SPD may be revised during the lifetime of your Plan. (BC Test)

#### **Policy FUL/02 Protected Setting of Fulbourn.**

55. Whilst the rationale of this policy is reasonable for what it seeks to do, its application and interpretation based on its detailed wording needs further review to ensure it is robust and has taken account of extant planning consents. (BC test)
56. Part 2 of policy –Important views - Are the views referred to those shown on Figure 7 and 8 as within the policy it refers to Figure 5 which is confusing? We understand that these views originate from the VDG SPD. We suggest that each view should have a specific identity, so it is easily referred to if required by a developer or planning officer in a report. It would be useful if each is identified in a list in the policy. Within the policy you need to clearly state which map or figure they are shown on – without this the policy is not implementable. (BC Test)

57. Your policy states that the views are to be protected but what does this mean in your Plan. No development? Or any development should not have a detrimental impact on the view? Your policy needs to be worded in such a way that it is not open to interpretation. The keys of in Figure 7 and 8 show different sorts of protected views and we are not sure if these are to be treated differently within the policy? Are all these views to be protected through this policy? It is not clear. (BC test)
58. Your policy further states that it is not just the views that are to be protected but the uses of the land across which the views point – planning policy cannot control agricultural land uses or retain woodland unless it includes protected trees or is an ancient woodland. (BC Test)
59. One of the views is shown to be extending over your neighbourhood boundary – you are only permitted to have policies within your designated neighbourhood area. E.g. Long-distance views from lower ground at Teversham. (BC Test)
60. Part 3 of policy –It is not clear what is meant by the term ‘built up’ area of the village –do you mean the development framework? When writing policies, you need to define terms used in the policy clearly. You may know what you mean but a developer or a planning officer may not interpret it in the same way. (BC Test)
61. Part 3 of policy - It would be useful to provide clarity on whether this part of the policy seeks to protect the character/pattern of field penetrating the built area or protect the existing boundaries for the lifetime of the plan? The language in the policy is different to that used in Figure 8. If figure 8 is to be implemented the policy should refer to it? (BC test)
62. We are unclear of the distinction between 3a and 3b as it appears that many of the new important countryside frontages have sensitive fields beyond them which is double protecting these areas. Many of the views are across Green Belt which gives them triple protection and they are also outside the development framework. - not the term ‘village framework boundary’ as stated in the policy. Any development outside of the development framework is considered by [Policy S/7 Development Framework](#) in the Local Plan and you do not therefore need to repeat protection outside of a development framework. We are unsure what you are implying could be developed in such areas as only certain restricted uses relating to the countryside are permitted under Policy S/7. (BC Test)
63. We are concerned that the demarcation of an important countryside frontage shown in Figure 8 does not take account of the extant outline consent and approved parameter plans for the Ida Darwin site. Whilst it is possible to still achieve the objectives of this policy and that of Policy NH/13 Important Countryside Frontages from the Local Plan, some of the definitive extents of the important countryside frontage needs to be reviewed by either altering the wording of the policy to be flexible or adjusting the representation in Fig 8 to be

consistent with the outline permission. Your Plan in this instance goes further than what the VDG SPD had suggested. (BC test)

### **Policy FUL/03 – Development in the Green Belt and Outside the Development Framework.**

64. Part 1 – This is repeating Local Plan policies for development frameworks and for Green Belt and does not offer anything specific to Fulbourn. (Policy NH/8 Mitigating the impact of development in and adjoining the Green Belt and Policy S/7 Development Frameworks) (BC Test)
65. Both Figures 7 and 8 have a designation of a ‘Green Belt – key visual gap to be retained’ which is shown as an area in the parish between the village and the edge of Cambridge. Is this a green buffer between the two built up areas? Is this designation for use in this policy? It has not been clearly referenced if it is within a policy. We note that it is included in the VDG SPD as an important visual gap between Fulbourn and Cambridge. (BC Test)
66. Part 2a – Have you defined the term ‘integrity ‘ for use in the policy? (BC Test)
67. Part 2b - Maintaining the richness of trees .... calculating the expected height of trees after 10years from planting is somewhat outside the scope of policy planning and therefore neighbourhood plan policy. (BC Test)
68. Part 2b We are unclear as to what ‘richness of trees and tree belts ‘means in practical terms. We believe this may mean abundance. Richness could mean species diversity but this is already limited and will be further limited by the policies listed in this document. We suggest that the words are changed to something clearer. (BC Test)
69. Part 2c - The NPPF already refers to light pollution in the following way – “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” The County Council has minimum standards for street lighting, and they may not adopt streets where provision is below standards. Suggest that reference to the Green Belt is not necessary given the Policy title? If this policy in your Plan is to limit street night light pollution it is not clear what this limit is? You would need to state this in the policy and have evidence to justify. (BC Test)
70. Part 2d Have these outward views been identified – we presume these are from the Village Design Guide and that there will be evidence of how these views were assessed to add to your Evidence Base. (BC Test)
71. Part 2e - Would a developer / planning officer know what “abundant” tree planting would look like in a development? What is abundant? If it is to be just native species that are suitable for additional planting be aware of how limited the woody native species list is. (BC Test)
72. Part 2e – Should this be ‘open spaces’ rather than open space? (Non-BC comment)

73. Part 2f – Have you defined ‘gateway buildings’ ? Is this gateway building on the edge of sites or in the whole of the site? It is not clear from the wording of the policy. (BC Test)

## **7. Enhancing Rural Environment**

74. Paragraph 7.1 – There seems to be some text missing between 7.1 and 7.2. (See paragraph 8.2 from earlier draft shared with SCDC). (Non-BC Test)
75. It would be helpful to have a map showing the rural environment of the parish in this section of the Plan and to identify the key elements such as the location of the SSSIs. (Non-BC Test)

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

76. The first section of the policy starts at part 3. We presume it should be part 1. (Non-BC Test)
77. Part 3 – Now states that all scale of new development shall consider this policy. Is this realistic for small scale schemes such as house extensions to consider? (BC Test)
78. This policy appears to be incorporating ideas from the VDG SPD and it would add to the strength of the policy if this were referenced in the supporting text.
79. Part 3b – ‘some larger native species of trees and shrubs’ Be aware of the limited list of larger woody native species and that some are less pleasant to live under/next to. (BC Test)
80. Part 3d – ‘protection of existing mature trees and successional planting’. Does protection mean retention? Good design and site layout around trees? Physical protection? A bit of all three? This is ambiguous. In relation to mature, what about semi-mature trees or even young trees for long lived species such as oak? Does indigenous mean native in this context? Native is a term used consistently elsewhere. What is a local species of tree? Is this species found locally but not necessarily a native tree species? For example, horse chestnut and sycamore? (BC Test)
81. Part 3e - ‘Indigenous street trees of appropriate large species and avoiding out-of-character ornamental trees. Does indigenous mean native in this context? Be aware that this is extraordinarily limiting. The list of native woody species is tiny to start and most of the species cannot cope with the amount of root disturbance found in streets, let alone the harsh, even hotter and even dryer, growing conditions. Many large natives do not have a good form for street tree planting. Did you mean to use the term ornamental? Can native ornamentals be used instead? We would question whether we could stop the planting of ornamental trees across a site? (BC test)
82. Part 2 – You should justify why you have chosen new developments of 10 units or more in the supporting text to your policy. The NPPF defines a major

housing site as being of ten or more. You may wish to consider amending your policy 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. (BC Test)

83. Part 2a – Does Figure 7 show the green infrastructure of the parish? Figure 5 in the Plan shows environmentally sensitive sites but there is no map in the Plan. that shows a green infrastructure linking the green bits within the parish together. There is not a green network safeguarded that a new development could know where to link to. (BC Test)
84. Part 2b – There is no supporting text to explain this criterion in the policy. The Local Plan has a policy for ensuring new development contributes towards open space provision. – Policy SC/7 Outdoor Play Space, Informal Open Space and New Development. (BC Test)
85. Part 2c - 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.
- (BC Test)
86. Part 2d – 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? By providing a report alongside the planning application. How would a planning officer be able to decide if drainage would be affected? Nothing included in the supporting text to assist. (BC Test)
87. Part 2e - How would such a criterion be reviewed/monitored? (BC Test)
88. Should this policy include a criterion for boundary fencing to allow gaps for hedgehogs as this is mentioned in the supporting text in paragraph 7.13? (BC test)

## **8. Local Green Spaces**

89. Paragraph 8.7 – This indicates that the local green space (LGS) sites are identified in the Policy Map which this neighbourhood plan currently does not include. Figure 9 shows the sites as well as Figure 7. Because of the scale of your parish wide maps it is not clear what the exact boundaries are of all of the proposed Local Green Spaces and Protected Village Amenity Areas included in your policy. (BC Test)
90. Paragraph 8.6 - Did you consider other green spaces such as the green in front of the Alms houses in Church Lane and at the south end of Home End? They cover small areas but are visually very important in this part of the village according to our heritage team. Also did you address the parkland green space on the present Fulbourn Hospital site and also the parkland green space to the

south of Elizabeth House. These are not within the village but are within the plan area and Fulbourn Hospital conservation area, and they are very important visually and historically to Fulbourn.

### **Policy FUL/05 Additional Protected Green Spaces within the Village**

91. It is important to be clear about definitions of words used in a policy – The policy is entitled ‘ Additional Protected Green Spaces’ which could confuse a future user of the Plan who is simply looking for the LGS and PVAA policy in your Plan. It would be clearer to simply call the policy the ‘Local Green Space and Protected Village Amenity Areas’. (BC Test)
92. Part 1 – This section of the policy can be deleted as you do not need to mention the existing LGS sites in the Local Plan. (BC Test)
93. The policy is currently very wordy and could be simplified. It is not necessary within the policy to repeat that the Local Plan has identified sites. Look at Histon & Impington Neighbourhood Plan’s LGS policy which states in Policy HIM11 ‘ In accordance with Policy NH/12<sup>5</sup> in the adopted Local Plan the sites identified in Table 5 and which are identified on Map 16 are designated as Local Green Space.’ This states where you can find the list of sites and the map where they are identified. You could use similar wording for both the LGS and PVAA designations referring to the Local Plan policy NH/12 for LGS and Policy NH/11 for PVAAs. (BC Test)
94. Within the policy it would be helpful to give each site a reference so that this can be used to identify it on a map. Without local knowledge it is difficult to know where the newly proposed PVAAs listed in 1b of the policy are located Figure 9 appears to give letters and numbers to the sites but there is no reference list in the key to know which is which or cross refer to the policy. Such a reference list would need to be added to the key of Figure 7 as this too shows the green spaces. This could then be used in the assessments so there is no confusion over sites for a future user of the Plan who does not have local knowledge of Fulbourn. (BC Test)
95. Figure 9 – In the Policies Map of the Local Plan PVAAs are shown with a pink symbol and it would help if those in your Plan also used this to avoid too many shades of green. (Non-BC Test)

## **9. Village Character**

96. Within the VDG SPD there is a map showing the different character areas within the village – It would be helpful if this map were included in this section of your Plan with a little summary description of the key characteristics of each area. The current description of the parish is reliant on local knowledge to know where the key buildings and roads are or cross referring to the VDG. The photographs in Figures 10 and 11 help but there are no locations to understand where each photograph was taken in the village. (BC Test)

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<sup>5</sup> <https://www.scams.gov.uk/media/12532/7-chapter-6-built-and-natural-environment.pdf>

97. Paragraph 9.3 – Second bullet. We presume that you mean unfarmed/unmanaged when you use the term 'wild'? (Non-BC test)
98. Paragraph 9.9 You could mention fieldstone as a facing material, and the fact that roofs of the traditional buildings are predominantly of thatch, clay tiles or pantiles.(Non BC Test)
99. Paragraph 9.11 You could include other features such as kerbstones, signpost and other street furniture.(Non BC Test)
100. We note that Fulbourn Hospital is only briefly mentioned in this section of your Plan – had you considered including this? Both the landscape and the buildings on the present-day hospital and Capital Park sites are of visual and historic importance and the plan could indicate the need to protect them. The heritage team has highlighted the importance of views across the parkland south of Victoria House and towards the Victoria House building. Its landmark status is worth stating in your Plan. ( Non BC Test)

#### **Policy FUL/06 – Securing Village Character**

101. For development management 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 Policy FUL/04. A future planning committee report can then simply refer to one policy rather than many if they are saying the same thing. It could lead to confusion. ( BC Test)
102. Part 1 – The policy does not need to state 'within the Fulbourn Neighbourhood Plan area' simply within Fulbourn will explain sufficiently. (BC Test)
103. An earlier draft of this policy made mention of the requirement to consider the Fulbourn VDG SPD when considering character. We suggest that you include mention of the SPD within this policy. (BC Test)
104. Part 1 – What is meant by the term integrity in the first sentence – it needs to be defined. (BC Test)
105. Part 2 - The policy seems to be rather prescriptive for all new developments including infill and house alteration in seeking a contemporary response to respect and positively contribute to the essential character. This may well be appropriate in many circumstances, but there may be instances for example on listed buildings/conservation areas where a traditional response may well be appropriate as has been successfully achieved in the village e.g. at 7-8 School Lane and 45 Pierce Lane. The word 'contemporary' needs to be explicitly defined as it means different things to different people. If this definition seeks to achieve a modern approach, than it should be 'strongly encouraged' rather than expected/demonstrated acknowledging that a traditional design may be appropriate in some instances. (BC test)

106. Part 2a – As the Plan includes a specific policy about streets and lane layouts does this criterion need to be also included within this policy? (BC Test)
107. Parts 2c /2d – Planning policies do not extend to controlling what is planted in rear gardens although we can request hedgerows and tree planning on village edges which could achieve criteria 2d of your policy. ( BC Test)
108. Part 2d – What is meant by ‘soft edges? Is this on the edge of the settlement and a transition with the countryside? Your policy wording needs to be unambiguous if it is to be implemented. (BC Test)
109. Part 2d – What is meant by the term diverse building frontages? This could contradict other parts of this policy that wishes to retain the essential character of Fulbourn and in Policy FUL/03 2f objections to gateway buildings. Can all these things be achieved? Your policies should not be open for interpretation but clear in what is being asked for. (BC test)
110. The policy could also be further strengthened by requiring new developments to take opportunities for improving the character of area where these do not reflect the essential character of Fulbourn. This would provide a hook to improve parts of the village many recently developed which do not share the essential village characteristics. (BC test)
111. This Policy could include a reference to protecting and enhancing buildings identified as non-designated heritage assets (NDHA). A number, in both conservation areas, are set out in the draft conservation area appraisal. Explicit reference to the suggested NDHAs and their possible future status in a local list would accord closely with the community aspiration which follows this policy. (BC test)

#### **Policy FUL/07 – Street and Lane Layout**

112. Given that the policy refers to streets and lanes, is it perhaps more appropriate for it to be in the Streets, Transport and Mobility chapter? (Non-BC Test)
113. Would some elements of this policy be covered by the essential design considerations in the Design Guide? It might be better to have a comprehensive policy for larger developments as they are the ones that will be providing additional streets, pedestrian and cycle routes. (BC Test)
114. Part 1 and 2 – These two parts of the policy appear to be repeating each other so part 1 could be deleted. (BC test)
115. The policy refers to the existing streets and lanes. There may be instances or opportunities in some existing streets and development which could benefit from improvements to the existing character. Hence an improvement to the wording of policy FUL/07 para.1 is suggested by replacing the word ‘essential’ to ‘positive’, and add the word Positive in para 2a –

- FUL/07 Para 1: “*The existing streets and lanes of Fulbourn shall retain their **positive** character as defined by green aspect, scale, width and alignment*”.
- FUL/07 para 2a: Adopt the **positive** characteristics.....  
(BC Test)

116. Part 2d - Should this section perhaps also have a reference to highway surfaces, particularly the desirability of retaining existing traditional kerbstones, avoiding the introduction of highly engineered kerb details, and maintaining the kerb-free character of many streets and lanes. (BC Test)

117. Part 2d – Planning policy does not have control of signage – this would be a highway matter. (BC test)

118. Part 4 – Is there part of this policy missing? (Non-BC test)

### **Policy FUL/08 Building and Landscape Design**

119. Part 1 – The words ‘they respond’ are repeated in this paragraph. (Non-BC test)

120. Part 1a – This criterion could be hard to implement in practice comparing the height of proposed buildings to the height of surrounding trees. Who would determine which trees are to be taken into account? (BC test)

121. Part 1a/b – The first two criteria of this part of the policy are considering height. They refer to all buildings and do not distinguish between residential and non-residential buildings such as community/doctor surgery, commercial or business which may have larger floor to ceiling heights and therefore a higher overall height. This needs clarification with opportunity for relaxation of height where appropriate or justified in non- residential buildings. (BC test)

122. Part 1b - The policy is overly restrictive in that it provides no opportunity for buildings more than 2.5 storeys where it may well be possible to achieve up to 3 storeys without a detrimental impact to the village character, for example in larger new developments which benefit from larger landscape settings. There are existing outline consents such as at Ida Darwin and land at Teversham Road, whilst predominantly seeking 2 storeys, already permits buildings up to 3 storeys in limited instances up to a maximum of 10.5m. Indeed, Victoria House, Waterworks or Chapels in Fulbourn may well be above 8.5m height. We therefore suggest that the policy wording should be amended to allow for a more flexible approach to height. We suggest ‘predominantly 2 storeys with potential for exceptional 2.5 to 3 storey buildings which positively relates to their use or landscape setting’. This will provide for a greater variety and diversity of built form and in order to promote sustainable densities, it would be beneficial to offer more flexibility in terms of height for 2.5/3 storeys which is different from 2 storeys below the tree crown cover which may well be varied across Fulbourn. The restriction of height for 2.5 storeys may result in over-dominant dormer windows or shallower or flat roof profiles. (BC test)

123. It would be useful to clarify how the large employment sites would need to comply in terms of height as the existing sites would not be consistent with Policy FUL/08 as parts of both Peterhouse Technology Park and Fulbourn capital park have buildings of 3 storeys and heights above 8.5m. Whilst Fulbourn Capital Park clearly has a village character, the Peterhouse Technology Park, in character terms appears to be an extension of the city, albeit must take account of a sensitive edge from the VDG SPD. (BC Test)
124. Part 1d – This criterion is not fully explained. What is meant by the term elegant simplicity? What variety of building types would be acceptable? How would a development management office know whether a development scheme met this criterion? (BC test)
125. Part 1e = Have you considered electric charging points for both cycles and vehicles? (Non-BC test)
126. Part 1f – This criterion appears to be repeating elements already considered in the policy. (BC test)
127. Part 2 There are a number of policies in your Plan that cross refer to another policy. There are occasions when you can refer to other policies, such as when allocating a site and requiring development to provide a mix set out in another policy – e.g. The mix shall be in accordance with the requirements set out in Policy X. But it can make for a more complicated plan for a future user to refer to. We should suggest that you consider carefully when using this technique of cross referencing. You should aim for your policies to be clear and easy to use. (BC Test)
128. Part 2a – Should this read ‘Native trees and shrubs?’ (BC Test)
129. 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. (BC Test)

## 10. Housing

130. Paragraph 10.3 for clarity it should be stated that it was Cambridgeshire ACRE that carried out the survey. (Non-BC Test)

### Policy FUL/09 -Housing Design Quality

131. The urban design officers have commented on this policy and do not consider that its content aim and principles are consistent. They consider that parts of this policy could be better placed in other policies in the plan. You may wish to consider this:
- Part 1 could be consolidated in Policy FUL/01
  - Parts 2 and 3 are more about detail and would be better placed in FUL/8
- (BC test)

132. Part 2c – We would question why only modification and extensions to existing dwellings would require to demonstrate that a contemporary design need to have been considered (as it would really depend on the character and context), but not the same requirement applied for minor and major developments, which could also be viewed as overly prescriptive. There are some successful schemes in Fulbourn that have delivered a traditional design in keeping with the original house and have been successful. See comments in paragraph 108 about Policy FUL/06 and the use and definition of the term contemporary which are relevant to this policy too. (BC test)
133. Part 2c – How would a developer be expected to demonstrate the ‘creative solutions that are sought in this criterion? (BC test)
134. Part 3 – 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? (BC test)
135. Part 3 - You will need to include in your glossary a definition of the different housing types mentioned in this section – infill and windfall sites, self build and co-housing. (BC Test)
136. Part 3b – What is meant by the term ‘design context’ in the policy? (BC Test)
137. Part 4a – 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. You will need to include such information. If an appraisal system is to be agreed with the Parish Council again there will need to be information about this process. It is not possible to include elements in a policy without the evidence base to back it up. (BC Test)
138. 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 village SPD or a future design code for villages/rural areas which is being considered by Ministry of Housing Community and Local Government would be more appropriate. ( There is currently a consultation being carried out the central government on [design codes](#) which you may wish to note.(BC Test)
139. Part 4b – We are not sure what this adds to the Local Plan policy SC/7? (BC Test)
140. Part 4c – What does this add 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 last year which you may wish to cross

refer to in the supporting text about renewables - [Greater Cambridge Design and Construction Supplementary Planning Document](#) (BC Test)

141. Part 5 – This section relates to all proposals but will only be for housing development. You may wish these to cover all types of development within the village including employment and therefore have a specific policy in your Plan? (Non-BC Test)
142. Part 5 – You could consider adding an additional criteria that show homes could have examples of wildlife friendly gardens and provide guidance leaflets for new residents. You mentioned this in paragraph 7.13 but did not then include the idea within a policy. (Non-BC test)
143. The supporting text to this policy would benefit 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. (BC Test)
144. Part 5c – We are not sure what this criterion is about as it covers many issues. How could it be implemented? (BC Test)
145. Part 5f – How does this add value to the existing Local Plan car parking policy which has a design-led approach? Policy TI/3: Parking Provision. (BC Test)

#### **Policy FUL/10: Housing Development and Local Need**

146. The numbering system for this policy needs to be reconsidered as it has e-g rather than a-c. (Non-BC Test)
147. Part 1e – Why at least 5% in the housing mix? Do you have justification for this amount? 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) (BC Test)
148. Part 1f – What would you consider to be a ‘suitable proportion’ for low-income houses for sale? Where is the justification for affordable housing for people with a disability? Should this be a separate consideration? Does part e also apply to part f – i.e. should 5% of the 40% be small units? How would a planning officer dealing with an application know what a “small unit” is? (BC Test)
149. Part 1g - Density is a crude measure of development form or a control on quality and hence should be considered carefully. It is curious why a density policy is added in this chapter as it relates to built form. Whilst the objective of restricting overall average net density in the village to 30 dph is reasonable to protect its character, heights etc, it isn’t advisable to restrict this in every part of developments due to its implication on creating diversity. For example, a closer-knit building on a high street or a row of terraces of two storeys which is in keeping with village character could at times be up to 80 dph. There are existing outline consents which proposes densities beyond 30 dph in specific

areas; Ida Darwin and the site off Teversham Road being an example (33- 45 dph). (BC test)

150. Final part of the policy – 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. 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. (BC Test)

151. We are not sure what is meant by ‘to support community integration in response to the requirements set out by Fulbourn Parish Council’. Is this requirement set out in your neighbourhood plan and supported by evidence for such requirements? There is a list on page 91 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? (BC Test)

#### **Policy FUL/11 – Ida Darwin and Teversham Road Sites**

152. There is no supporting text to provide any further information as to why these additional requirements are being asked on these sites. Justification is required rather than just adding it into a policy. (BC Test)
153. The policy should not repeat the Local Plan policies and must be in general conformity with them but can set out additional requirements “in addition to the Local Plan policies H/3 and SS/3. The policy currently does not mention the Local Plan policies. (BC Test)
154. Are these sites identified on any maps – it would be helpful to have an inset map near to this policy for those who do not have local knowledge of the parish. (BC Test)
155. Part 1c – Mention is made of preserving views across open countryside etc but is this shown on any maps. We note that the VDG SPD includes a map showing such views which could be incorporated into the Plan or cross referenced - page 16. (BC Test)
156. Part 1e It would be helpful to have an inset map showing where these pedestrian and cycle connections are within Fulbourn – the VDG SPD does include such a map about the Ida Darwin site - Page 16. (BC Test)
157. Part 1f This should be applicable to either the entire Fulbourn Neighbourhood Plan or for a certain threshold of development in the Neighbourhood plan area rather than rather than just the Ida Darwin site. (BC test)
158. 2a – How could this be measured? Not sure that a planning policy could protect against this completely. (BC Test)

159. The formatting of this policy seems to have hidden the footer on page 63. (Non-BC Test)

### **Policy FUL/12 Rural Exception Sites**

160. What does this add to the existing Local Plan policy(H/11)? We do not think that these criteria could be implemented without full justification. The NPPF is more flexible on the facilitation of rural exception sites including limited market housing at a minimum level to make the affordable housing scheme viable. (BC Test)
161. Part 1d – The reference to the policies is slightly confusing and may need each policy to be spelt out to be clear – Policies FUL/01; FUL/02; FUL/03 and FUL/04. Also it may not just be these policies that the development of rural exception sites should have regard to – Policies FUL/06 FUL/07, FUL/08 and FUL/10. Also see the comments that we made in paragraph 127 about cross referring to policies. (BC Test)

## **11 Employment**

162. It would help to have an inset map showing where the key employment sites are within the parish. (Non-BC Test)
163. Paragraph 11.6 – Your Plan does not need to include support for the employment policies within the adopted Local Plan, but it must be in general conformity with the identified strategic policies. (Non-BC Test)
164. Could policies FUL/13 and FUL/15 be merged to reduce duplication and to aid clarity? Rural and Edge of Village Employment sites appear to have fewer requirements that those within the built-up area.

### **Policy FUL/13 – Employment Development in General**

165. Part 1 – The correct term to use is development framework boundary and this part of the policy is simply repeating the Local Plan policy E/12. Whilst recognising that it is good for local people to live and work within a village it is not possible to restrict new employment opportunities to only local residents – planning policy does not have that level of control. (BC Test)
166. Part 2a – Is it realistic to require no loss of character and visual amenity from an employment development with some level of car parking? Is there a different wording that could be used that would prevent an unacceptable loss of character/visual amenity? How could a developer demonstrate that their proposals will not ‘materially’ increase the traffic load on village roads. Surely any new development is likely to generate some traffic, so it is unreasonable to expect no increase in traffic movement as a result of new development? (BC Test)
167. Part 2b – Whilst recognising that heavy vehicles may impact the smaller roads within the parish is it realistic to expect to reduce movements by vans too.

Surely this would restrict the types of employment that would be acceptable within the parish. (BC Test)

168. Part 2c - It is not clear what the requirement for heavy vehicle movements at the periphery of the village means? Are there lorry weight restrictions through the village? Which roads does the periphery cover? What does the Village Boundary refer to? As it currently stands, it would be difficult for a business that used HGV's to understand acceptable sites in the area. Restrictions on HGV movements from a development would possibly need a Section 106 obligation to be entered into for every such development and it would need to meet the tests referred to previously, namely that any obligations 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

(BC Test)

### **Policy FUL/14 Large Employment Sites**

169. We would recommend that you include a map showing the employment sites mentioned in this policy. (Non-BC Test)

170. 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. (BC Test)

171. Part 2 – What is meant by ‘ambitious sustainable travel’? How would this be measured? What is ‘accepted best practice’? Explanations for these are not included in the supporting text. (BC Test)

172. The policy mentions clear responsibilities for monitoring but by whom? Who is to monitor the transport assessment – ourselves or the future business? (BC Test)

### **Policy FUL/15 Rural and Edge of Village Employment**

173. Part 1 – This includes requirements for there to be “no increase in volume.” would seem to be unachievable and it takes no account of whether there is a material impact upon local amenity and road safety. If it only relates to the volume of HGVs then this might also be onerous, depending upon what size of vehicle is determined to be a “heavy vehicle”? (BC Test)

174. Part 1b – How would you define adequate planted edges? Is this buffer planting? How would a planning officer considering a planning application be able to determine if planting is adequate? (BC Test)

## **12 Community Facilities**

175. Paragraph 12.3-12.4 - In preparing the currently adopted Local Plan SCDC and Cambridge City Council jointly commissioned a survey of all the playing pitches within the Greater Cambridge area. This is likely to be updated to inform the

new local plan being prepared.

[https://www.scambs.gov.uk/media/3455/final\\_playing\\_pitch\\_strategy\\_2016\\_rd-csf-190\\_revised.pdf](https://www.scambs.gov.uk/media/3455/final_playing_pitch_strategy_2016_rd-csf-190_revised.pdf) There was also a study carried out on indoor sports facilities -

[https://www.scambs.gov.uk/media/3445/final\\_indoor\\_sports\\_facility\\_strategy\\_2016\\_rd-csf-200\\_revised.pdf](https://www.scambs.gov.uk/media/3445/final_indoor_sports_facility_strategy_2016_rd-csf-200_revised.pdf)

(Non-BC Test)

176. It would help to tell the different story lines in this chapter if the supporting text for each topic was put nearer to the actual policy. Currently the recreation ground and health care provision are all together. We would suggest that each of these issues has its own policy rather than being put together in one as Policy FUL/17. (BC Test)

### **Policy FUL/16 – Valued Community Assets**

177. This policy appears to be all embracing. Is it the intention that it covers all the assets of community value that are formerly accepted on the register held by SCDC? These would not need to be protected again through your Plan. Or is it protecting more than this formal list – it is unclear as there is no information in the supporting text to explain. Are these the assets listed from a-n in Figure 6 shown as a purple diamond on the map with no explanation of what this represents? There are already a range of policies in the adopted Local Plan that protect existing assets. Policy SC/3: Protection of Village Services and Facilities and Policy SC/8: Protection of Existing Recreation Areas, Allotments and Community Orchards. (BC Test)
178. Community Aspiration – This will need to be formatted so that it looks very different from the policies in your Plan – it is only a subtle colour change as currently shown. This needs to be more distinctive. (BC Test)

### **Policy FUL/17 – Recreational and Healthcare Facilities**

179. Part 1 – In order for Section 106 obligations to be used they must meet three legal tests namely that any obligations 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

This policy 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. (BC test)

180. Part 2 – Has this requirement been discussed with Sport England? The first sentence is confusing. Has there been a suggestion to create alternative facilities elsewhere? (BC Test)
181. Part 2a – Has the landowner of this field been consulted over this proposal and 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. (BC Test)
182. You will need to add wording to the policy indicating which map the designated field is shown on – ‘...as shown in Figure 1 and 7’. (BC Test)
183. Part 2b – Has an assessment been carried out on the demand for indoor facilities? You will need evidence to justify why you are stating that outdoor facilities are to be prioritised over indoor ones.( Refer to the studies done of indoor facilities as part of the evidence base for the Local Plan mentioned in paragraph 123) (BC Test)
184. Section after 2b – The Local Plan has a policy to ensure developers contribute towards open space provision. New developments will require green space and must comply with the minimum standards included in Policy SC/7 in the Local Plan so that their new residents will have access to open space A policy can state a preference for investment in existing facilities unless specific circumstances dictate otherwise ( no room to expand for example) BC Test)
185. Part 3 – Is the current GP practice and / or the Local Health authority supportive of the proposals in your policy? If the current site is not used it would be helpful to have a criteria-based policy to indicate what would be required of a new site to be suitable for a health centre. Size, location, design, parking requirements etc. Some of this information to create this policy is included on page 82 in the Fulbourn Health Centre section of Village Aspirations – Any new facility should be located at the heart of the village; easily accessible; site large enough for an integrated services approach such as on site pharmacy, dental, physiotherapy and counselling services (BC Test)
186. It would be helpful to have an inset map showing where the existing Health facility is located in the village. (Non-BC Test)
187. Part 3 – The first section supports a multipurpose healthcare facility etc over any other community facilities. Does this imply that there are other community uses that could go into the existing site and would be in competition for the site??? (BC Test)
188. Figure 1 – This must be out of sequence as there is already a Figure 1 at the start of the Plan showing the designated neighbourhood area for Fulbourn. (Non-BC Test)

### **13 Streets, Transport and Mobility**

### **Policy FUL/18 – Sustainable Mobility**

189. Part 1d – We would suggest that you could include a map into your Plan showing the existing network of footpaths and indicating where there are gaps which it would be good to fill to improve the connectivity of the parish. (Non-BC Test)
190. You have not taken up our earlier comment to include within your Plan a policy to encourage the provision of electric charging points for the local community although mention is made of them in Chapter 14 on other aspirations of the Plan. You could take this opportunity to include them in a policy (Non-BC Test)

### **Policy FUL/19 – Safe Streets**

191. Part 1 – It is not clear how this would be achieved? Presumably where there is new development proposals in the parish the street scene should not be changed to impact the character of that part of Fulbourn – following the principles set out in the VDG SPD? As currently worded, this is not clear. (BC Test)

## **14 Other Aspirations of the Fulbourn Neighbourhood Plan**

192. This provides a good list of future aspirations within Fulbourn – some of the information is repeating what has already appeared in the main body of the Plan and some could be added to the supporting text of policies to better explain the reasoning for some criteria in policies in the Plan. (Non-BC Test)
193. Under 5 Sustainable mobility – We presume that bullet 3 refers to charging points for cycles and cars? (Non-BC test)

## **15 Delivery Priorities**

194. 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.
195. However, what the list cannot be used for is to redistribute section 106 funds necessary to satisfy one element of the Local Plan in order to increase the level of contribution required under another (i.e. it would not be possible for the Council to decide not to secure an allotment contribution in order to provide a greater level of funding than the development requires towards a new Health Centre). Furthermore, the list is not sufficiently clear in its current form. For example, the list makes no mention of children's play areas, education and libraries

## 16 Implementing the Plan

196. You may wish to mention here how the Plan is to be monitored. An example of wording was provided by the examiner of the Cottenham Neighbourhood Plan -

### *'Monitoring and Review*

*1.54 The Parish Council acknowledge that circumstances may change within the Plan period. In addition, some policies will work better than others. On this basis the Parish Council will review the effectiveness of the Plan's policies on an annual basis*

*1.55 Where appropriate the Parish Council will consider either a full or a partial review of the Plan. This will be based around the monitoring information gathered, any revisions which may arise with the Local Plan and any broader changed circumstances which may arise,*

(Non-BC Test)

## Appendix 1

197. This is much too detailed for inclusion in the Plan and it's recommended that, if it's considered necessary to include a list of evidence documents then they are restricted to those that are directly related to content in the Plan. (Non-BC Test)