

UDC Call for Sites – Technical Accuracy - Response from Felsted Parish Council

Felsted Parish Council has a number of general comments regarding the assessment criteria, assessment formulae or interpretation, as there are no explanatory notes it is not possible to determine how some classifications were reached. In addition, we are very concerned that the fully “Made” Felsted Neighbourhood Plan is being completely ignored.

We recognise that this is purely a “Technical Assessment” covering accuracy of facts and we are not being asked to comment at this stage on sustainability or suitability, but there are some statements that do not appear to be justified and could result in inconsistency.

Felsted Neighbourhood Plan

The existence of the Felsted Neighbourhood Plan (FNP), one of only four fully Made Plans within Uttlesford, appears to have been totally disregarded.

The FNP, fully “Made” less than two years ago and unanimously supported by UDC, delivers 63 new dwellings and associated infrastructure for Felsted and Uttlesford, some of which are yet to go through planning approval. The FNP allocates sites within Felsted for development and Policies within the Plan protect certain areas of the Parish from inappropriate development. UDC’s current Local Plan is extant, albeit 2005 and as the FNP forms the most up to date component of the Local Development Plan it should be recognised and respected. We acknowledge that the outdated 2005 Local Plan requires updating but the FNP being less than two years old, cannot be simply ignored and must be acknowledged as a major material consideration in this exercise.

It is noted that on 28th October 2021 the Local Plan Leadership Group considered two pieces of the emerging evidence base for the Local Plan (reports on the Landscape Sensitivity Phase 1; and Heritage Sensitivity Phase 1,) and that concern was expressed about the associated implications for *emerging* Neighbourhood Plans but, more importantly, there was no apparent reference to fully “Made” plans such as Felsted’s.

Their comments included *“The request to check to what extent and how the consultants had used emerging Neighbourhood Plans and emerging Neighbourhood Plans’ evidence”*. There was also a reference that *“noted that the Newport, Quendon and Rickling Neighbourhood plan had not been referenced”*.

Whilst it is encouraging that “emerging Neighbourhood Plans” are to be considered, even more significantly, how can there be absolutely no reference to fully “Made” Neighbourhood Plans such as Felsted’s?

Following participation in the UDC “Call for Sites, update for local Parish and Town Councils” Zoom meeting on 26th July 2021, Felsted Parish Council wrote to Cllr. Bagnall, Chair of the Local Plan Leadership Group, expressing serious concerns that “Made” neighbourhood plans might not receive the recognition they should as important constituents of the current Statutory Local Development Plan and questioning what weight was to be given to Neighbourhood Plans during the site assessment process for the new local plan. With 19 sites allocated within Felsted, including one (a

combination of several proposals around Gransmore Green) in the “major sites” category it is now clear that the existence of the fully “Made” Felsted Neighbourhood Plan has been completely ignored and from the evidence provided by the 28th October 2021, Local Plan Leadership Group meeting, that our clearly expressed concerns were well founded.

Our letter to Cllr Bagnall can be found at:

<https://www.felsted-pc.gov.uk/wp-content/uploads/Letter-to-Cllr-Geoff-Bagnall-July-21-1.pdf>

Felsted Parish Council continue to be extremely concerned that our fully “Made” Felsted Neighbourhood Plan is not recognised and that no weight is being applied within the Call for Sites assessment process.

Development Limits

There are seven sites in the Felsted allocations (sites Felsted 003 Res, 004 Mix, 005 Res, 0013 Res, 0015 Res, 0016 Res and 0017 Mix) which are wrongly identified as being “within development limits” when they are definitely not within existing defined village developments limits (VDL’s).

The assessment comments for these seven sites actually state “Within development limits (<1% intersects)”.

But this makes no sense. The symbol < means (in its normal context) “less than” and intersects means “crosses” therefore if “less than 1% crosses” the DVL they are NOT “within development limits” and they should NOT be classified as such.

In addition to the imprecise interpretation that (<1% intersects) results in these sites being wrongly classified as being within development limits, for one group of examples, sites 0013, 0014 and 0016, (all of which are actually components of the same site) there are other justified reasons for challenging this incorrect classification. The site has previously been refused development by UDC (and was subsequently dismissed on Appeal) and the reasons given by the UDC planning officer for refusal included the specific statement that the site was “outside development limits”. The Appeal inspector supported this statement.

Critically, the same site is also specifically identified within the most recent “Felsted – Heritage and Character Assessment” undertaken by AECOM in support of the Felsted Neighbourhood Plan as being “particularly sensitive to change”, where it is stated “*The areas of open countryside between Causeway End, Cobblers Green and Cock Green are sensitive to change due to the function of this land in preventing coalescence between the areas of existing settlement*”. This includes the land in question which is between Causeway End and Cobblers Green and it is not acceptable to classify this “open countryside” land as “within development limits”.

So from the example of the (three) sites above, it is clearly incorrect to say that these seven sites are “within development limits” and that statement should be removed.

Walking distance from facilities

The generic “walking distance” (time in minutes) measurement is crude and misleading.

The relevance of “walking distance” along a flat, well-lit pavement differs very significantly from walking along a dark unlit, undulating and narrow country lane, carrying high speed traffic and without any footpath or refuge.

There are a number of instances in the technical assessments where what, on a cursory examination and without applying local knowledge, appears to be an acceptable “walking distance” when in reality and properly assessed it would be dangerous and completely unwalkable.

In our view, there should be a workable definition of “walking distance” or it should be abandoned as an assessment criteria.

Examples are sites (Felsted 010 Res / 011 Res / 012 Res). The assessed “walking time” to facilities, in particular the Primary School are, from a sustainability perspective irrelevant, as the road that must be walked (the B1417) is a speed derestricted road with no pavements (or even verges for long stretches for pedestrians to escape to) or street lighting which includes a number of bends and a narrow hump backed bridge with virtually zero visibility for pedestrians. Use of this road as a pedestrian access to any facility would be foolhardy and cannot under any reasonable circumstances be considered as a sustainable option and it should not be assessed as such.

Suggesting these roads provide a “green traffic light” option for children to walk to school is irresponsible and would open the Council to ridicule and legal action to improve the road network should these sites progress to the next stage and be deemed “accessible”.

There are other sites (e.g. Felsted 13 Res / 015 Res / 016 Res / 019 Res) where pedestrian access to facilities would necessitate the use of roads that have no pavements or street lighting and in some instances derestricted speed limits.

Proximity to Bus network / Services.

Statement for assessment - “Bus network - 1 service per hour (walking)”

There are several references to a 1 hour bus service. However, the only 1 hour bus service through Felsted Parish is not a conventional “local bus service” but is the 133 Colchester to Stansted Airport service. This service which terminates at Stansted Airport (or Colchester) cannot be considered appropriate as a commuter or community service bus as there is no link to the nearest obvious point of high employment and commerce, Chelmsford City. Considering that Felsted is only approximately 8 miles from the City of Chelmsford, the 133 does not provide access. There are only 4 buses per day to Chelmsford from Felsted (route 16) and this is very limited with the first bus leaving Felsted at 7.33 am and the next not until 9.55 am. The latest return bus on route 16 to leave Chelmsford is at 15.49. Therefore, neither the 133 nor 16 can be considered suitable as commuter or community services from a sustainability perspective. The absence of a workable bus service through Felsted for commuting cannot under any sustainability criteria assessment be considered realistic and it is wrong to imply otherwise.

Specific Sites – General Comments

Felsted 012 RES - Sparlings Farm, Braintree Road, Felsted (Eastern part of Parcel E)

Access to this large site appears to be totally dependent upon either the development of site Felsted 010 RES or the use of the single track road of Gransmore Green.

| Site Reference | Location | |
|---|--|--|
| Felsted 001 RES | Land south of Braintree Road (opposite Chaffix Farm) Felsted – CM6 3EW | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 15 mins (walking) | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL |
| Note: Site is not supported within the “Made” Felsted Neighbourhood Plan | | |
| Site Reference | Location | |
| Felsted 002 RES | Land north west of Bannister Green Felsted – CM6 3NF | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 10 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins (walking) | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |
| Note: Site is not supported within the “Made” Felsted Neighbourhood Plan | | |
| Site Reference | Location | |
| Felsted 003 RES | Land north of Garnetts Lane and Chestnut Walk Felsted – CM6 3EE | |
| Bus network - 1 service per hour (walking) | 10 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital | 30 mins | There are only 4 services per day (Route 16) – see |

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| (public transport) | | general comments |
| GP and health centre (walking) | 10 mins (walking) | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|--|--|
| Felsted 004 MIX | Land south and west of Watch House Green Braintree Road – CM6 3EQ | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) |
| GP and health centre (walking) | 15 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|--|--|
| Felsted 005 RES | Land off Rayne Road Bannister Green Felsted – CM6 3NQ | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|------------------------|--|---------|
| Felsted 006 RES | Land off Rayne Road Bannister Green Felsted – CM6 3NJ | |
| Assessment category | Stated assessment | Comment |

| | classification | |
|--|-----------------------|--|
| Bus network - 1 service per hour (walking) | 15 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 15 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|--|
| Felsted 007 MIX | Sunnybrook Farm, Braintree Road, Felsted – CM6 3EB | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 40 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|--|
| Felsted 008 RES | Land south east of Clifford Smith Drive Felsted (site 1 - part of field) – CM6 3UG | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 10 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|---|
| Felsted 009 RES | Land south east of Clifford Smith Drive Felsted (site 2 - whole field) – CM6 3UG | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |

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|--------------------------------|---------|--|
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|--|--|
| Felsted 010 RES | Kinvara Business Park Felsted – CM6 3LB | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 20 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 37.5 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Primary school (walking) | 30 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Secondary school (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Retailers that sell fruit & vegetables (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Local centres (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|--|
| Felsted 011 RES | Sparlings Farm, Braintree Road, Felsted (Parcels ABCD and western part of E) – CM6 3LB | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 20 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Primary school | 15 mins | Walking would be unsafe as road is derestricted and |

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| (walking) | | has no pavements or street lighting. |
| Secondary school (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Retailers that sell fruit & vegetables (walking) | 37.5 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|---|
| Felsted 012 RES | Sparlings Farm, Braintree Road, Felsted (Eastern part of Parcel E) – | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 37.5 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Walking would be unsafe as road is derestricted and has no pavements or street lighting. Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Primary school (walking) | 20 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Secondary school (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Retailers that sell fruit & vegetables (walking) | 37.5 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|--|--|
| Felsted 013 RES | Land east of The Bungalow, Causeway End Road, Felsted – CM6 3LU | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 20 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. Causeway End Road has no pavements or street lighting. |
| Hospital (public transport) | 40 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Causeway End Road has no pavements or street lighting. |
| Primary school (walking) | 37.5 mins | Causeway End Road has no pavements or street lighting. |

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| Retailers that sell fruit & vegetables (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Local centres (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL and has previously been refused planning by UDC (and subsequently on Appeal) for being outside the VDL |
| Note: Site is not supported within the "Made" Felsted Neighbourhood Plan | | |
| Site Reference | Location | |
| Felsted 014 EMP | Dunmow Road, Blake End, Rayne – | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 5 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. |
| Note: Site is not supported within the "Made" Felsted Neighbourhood Plan | | |
| Site Reference | Location | |
| Felsted 015 RES | Land east of The Bungalow, Causeway End Road, Felsted – CM6 3LU | |
| Assessment category | Stated assessment classification | Comment |
| Bus network - 1 service per hour (walking) | 20 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. Causeway End Road has no pavements or street lighting. |
| Hospital (public transport) | 40 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Causeway End Road has no pavements or street lighting. |
| Primary school (walking) | 37.5 mins | Causeway End Road has no pavements or street lighting. |
| Retailers that sell fruit & vegetables (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Local centres (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Settlement Development | Within development limits (VDL) | The site is NOT within the VDL and has previously been refused planning by UDC (and subsequently on Appeal) for being outside the VDL |
| Note: Site is not supported within the "Made" Felsted Neighbourhood Plan | | |
| Site Reference | Location | |
| Felsted 016 RES | Land east of The Bungalow, Causeway End Road, Felsted – CM6 3LU | |

| Assessment category | Stated assessment classification | Comment |
|--|----------------------------------|--|
| Bus network - 1 service per hour (walking) | 20 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. Causeway End Road has no pavements or street lighting. |
| Hospital (public transport) | 40 mins | There are only 4 services per day (Route 16) – see general comments |
| GP and health centre (walking) | 30 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. Causeway End Road has no pavements or street lighting. |
| Primary school (walking) | 37.5 mins | Causeway End Road has no pavements or street lighting. |
| Retailers that sell fruit & vegetables (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Local centres (walking) | 20 mins | Causeway End Road has no pavements or street lighting. |
| Settlement Development | Within development limits (VDL) | The site is NOT within the VDL and has previously been refused planning by UDC (and subsequently on Appeal) for being outside the VDL |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|--|---|---|
| Felsted 017 MIX | Frontage land to the east of Chelmsford Road Felsted – CM6 3EY | |
| Assessment category | Stated assessment classification | Comment |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| Bus network - 1 service per hour (walking) | 10 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. |
| GP and health centre (walking) | 15 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. |
| Settlement Development Limits | Within development limits (VDL) | The site is NOT within the VDL |

Note: Site is not supported within the “Made” Felsted Neighbourhood Plan

| Site Reference | Location | |
|-----------------------------|--|---|
| Felsted 018 MIX | Land to the east of Chelmsford Road Felsted – CM6 3EY | |
| Assessment category | Stated assessment classification | Comment |
| Hospital (public transport) | 30 mins | There are only 4 services per day (Route 16) – see general comments |
| Bus network - 1 | 10 mins | Route 133 – Stansted Airport service only – Stansted |

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| service per hour (walking) | | / Colchester only – see general comments. |
| GP and health centre (walking) | 15 mins | John Tasker House Practice has previously advised that Felsted Surgery is full to new patients. Nearest option would be Gt Dunmow – so add 30 mins and not walking. |
| Note: Site is not supported within the “Made” Felsted Neighbourhood Plan | | |
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| Site Reference | Location | |
| Felsted 019 RES | Land at Willows Green Felsted – CM3 1QD | |
| Assessment category | Stated assessment classification | Comment |
| Primary school (walking) | 40 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Hospital (public transport) | 50 mins | There are only 4 services per day (Route 16) – see general comments and these are from village centre. |
| Bus network - 1 service per hour (walking) | 20 mins | Route 133 – Stansted Airport service only – Stansted / Colchester only – see general comments. |
| Retailers that sell fruit & vegetables (walking) | 37.5 mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Local centres (walking) | > 60mins | Walking would be unsafe as road is derestricted and has no pavements or street lighting. |
| Note: Site is not supported within the “Made” Felsted Neighbourhood Plan | | |