



# Local Plan Consultation Response Form

Before responding, please refer to the Consultation Document which contains essential background information to each question: [www.uttlesford.gov.uk/lpconsult](http://www.uttlesford.gov.uk/lpconsult)

Type responses into the relevant boxes (where it says '*type here*' in red italics). All the questions are optional and your response will be valid even if you only answer one question. Insert as many lines as you need to complete your response.

Please insert your details in the box on the next page.

Reply by **4.30pm on Friday 4 December 2015** to [planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk)

## Your details

Please insert your details below. All responses will be published on the [Consultation Portal](#) together with your name and (if applicable) organisation details. You will need to provide your name, organisation (if applicable), and full address in order for your comments to be processed. Your address and email will not be published.

Anonymous responses will not be considered.

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Please email your response to [planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk). You should receive an automated receipt.

All responses will be collated in a public report during early 2016. A subsequent report will address all the issues raised, and this will help us to shape the emerging Local Plan, a draft of which is anticipated during the second half of 2016.

Progress with the Local Plan may be monitored at [www.uttlesford.gov.uk/ppwg](http://www.uttlesford.gov.uk/ppwg).

**Thank you for your response**

**Insert as many lines as you need to**

**Question 1: Vision and Development Strategy (Consultation Document Section 2.1)**

What do you think the Council should include in its Local Plan vision and development strategy for the District in 2033?

The vision of maintaining and enhancing the district's "high quality natural and historic environment" will be compromised if settlements do not continue "to be separate entities with green space between them."

This vision is already being threatened by current planning decisions and by many of the scenarios in this document.

Development strategy should ensure the preservation of green spaces, countryside and historic hedges and trees within developments.

Strategic considerations must include realistic assumptions. For example, employment expectations. It will remain a reality that, whatever attempts are made to bring in businesses to create employment, a high number of new residents will commute to work in other districts and will be looking for access to appropriate road and rail links.

**Question 2: Cross-boundary strategic planning (Consultation Document Section 2.2)**

Are there any specific cross-boundary planning issues that the District Council should consider in putting together its Local Plan? Please provide details.

Strategy in all of the neighbouring authorities (North Herts, South Cambridgeshire, Braintree, Chelmsford and East Herts) will have an impact on Uttlesford residents and settlements. All should be consulted.

Where major settlements are proposed on or close to Uttlesford borders, then a full assessment of the impact on Uttlesford must be carried out.

This specifically applies to the site identified on the Braintree Local Plan 'call for sites', which includes an area within Felsted Parish (close to Uttlesford's area 9), should it be taken forward to consideration.

**Question 3: Settlement Hierarchy (Consultation Document Section 2.3)**

Refer to the Consultation Document at [www.uttlesford.gov.uk/lpconsult](http://www.uttlesford.gov.uk/lpconsult) for essential background information to each question. Respond by Friday 4 December to [planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk)

Do you agree with the Planning Inspector that the settlement hierarchy is “generally soundly set out” and represents a pragmatic way forward for the Local Plan?

The Council is particularly interested to know

- If there has been any significant changes in the services and facilities in any settlement which should lead to its reclassification?
- Is the proposed function for each type of settlement is appropriate?
- Are there other relevant factors which suggest that a greater or lesser amount of development should be directed to a settlement than would reflect its strict place in the settlement hierarchy?
- Whether you think an additional tier should be added to the hierarchy to indicate the potential for one or more new settlements? (See also Question 10)

In classifying the hierarchy, greatest weight should be given to the existence - or approved development - of permanent infrastructure (i.e. road and rail access and capacity, adequacy of water, gas, electricity and broadband supplies). This needs interrogation rather than simple overview. For example, the lack of an Eastbound exit from the A120 between Dunmow and Rayne severely limits the practicality of accessing the A120 without using routes through villages for other exits.

The continued existence of services such as shops, halls, pubs, post offices, GP surgeries and bus routes cannot be assumed, and should carry far less weight as an indicator of a ‘local centre’ suitability for development.

It should be noted that the Felsted FKS school for 4-7 year olds closed in 2015, reducing the local school capacity.

The shop at Stebbing is also only kept open through volunteers.

#### **Question 4: Infrastructure planning (Consultation Document Section 2.4)**

Please provide details of any particular infrastructure issues which you feel the Council needs to consider, if possible providing evidence.

As noted under point 2, where major settlements are proposed on or close to Uttlesford borders, then a full assessment of the impact on Uttlesford infrastructure must be carried out. This specifically applies to the site identified on the Braintree Local Plan ‘call for sites’, which includes an area within Felsted Parish (close to Uttlesford’s area 9), should it be taken forward to consideration.

Planners should take more account of the impact of developments on historic villages, particularly the creation of ‘rat runs’ through villages such as Felsted, which were built before cars were even invented and which have narrow and restricted roads and junctions.

Developments such as Oakwood Park, Flitch Green, have a dramatic impact on adjacent villages. In October 2015, during a Neighbourhood Plan traffic survey, 3914 vehicle movements in and around Felsted village centre were recorded in a two hour period. There is no opportunity to avoid the main crossroads junction in the village centre. This is unsustainable even now and the Parish already struggle to find effective proposals to help ease the flow of traffic.

Whilst the A120 is quoted as offering road access for various options, the reality is that the short length of dual carriageway ends in a bottleneck at Braintree (Mark's Farm roundabout) and has no Eastbound exit between Dunmow and Rayne, limiting its usability for Area 9.

Braintree offers only limited rail access to London, with 1 train per hour and extremely limited parking. It must not be assumed that these problems will simply be solved to deliver a station capable of taking even moderate commuter traffic.

It is also, even now, extremely difficult to even reach Braintree train station from the east due to road congestion.

Access to Chelmsford mainline rail station (and to the new, planned, north Chelmsford station), is also extremely limited due to congestion during rush hour after the Great Leighs bypass. There are some 'rat runs' which bypass some of the congestion, but these will result in unacceptable traffic through small villages.

The only realistic rail option for increased commuter traffic into London remains Stansted.

Consideration must be given to water and sewage system capacity (e.g. prolonged recent outages in Dunmow/Felsted; loss of Felsted school buildings to fire because of inadequate water pressure and supplies).

It should be noted that Stansted takes its water from London. Where would supplies for 10,000 houses in Area 9 come from?

The capacity of the M11 north of J8 must be considered in addition to Jn8 improvements.

Broadband provision must also be reviewed and vastly improved for business and home use.

### Question 5: Employment (Consultation Document Section 2.5)

What should be the main influences on the employment strategy? Are there any locations which you feel would be particularly suitable for employment?

Recent (and current) developments consist mainly of 'dormitory' settlements for commuters employed outside the district (Cambridge, London and Chelmsford). Although

Stansted Airport is the major local source of employment, many of its staff are bussed-in from other districts with more affordable housing.

The employment strategy must include a realistic attitude to future employment opportunities:

- The Environment report 3.9.1 for Area 9 states as a likely benefit that, *'The potential scale of the development maximises the possibility of.....employment opportunities to minimise the need for travel.'* Whilst any plan will include development of new enterprise opportunities and encouragement for home-based working (with needs to consider broadband/workspaces), it must recognise that employment commensurate with the demographic likely to live in the area will be largely provided by existing places of work (Cambridge, London, Chelmsford).
- The strategy must not therefore simply assume that work can be provided for thousands of people in a new area in the belief that 'it will happen.' It is a more realistic assumption that the majority of residents will add to the transport demands into Cambridge, London, Chelmsford and Stansted.

### Question 6: Housing Tenure Mix and Affordability (Consultation Document Section 2.6)

What are the main issues relating to housing tenure mix, and affordability which the Council should consider?

Excluding social housing, there are insufficient smaller properties built for "open market" purchase by single/younger people or for older people to downsize into.

Most new developments have an emphasis on either three/four bed houses. This may include some smaller social housing, but not enough one to two bed properties of the right types of property, and in an appropriate environment and location, for retirees to outright purchase. Not everyone wanting a smaller home requires financial subsidy.

### Question 7: Leisure, Recreation, and Open Space (Consultation Document Section 2.7)

What do you think are the main issues the Council should consider in relation to Leisure, Recreation, and Open Space?

The provision of leisure centres, halls, open spaces and **cycleways** should be integral to any significant development.

The **timely** construction of such facilities must be a condition of planning permissions and not allowed to follow after housing, which can result in years of delay and social problems within developments.

### Question 8: Natural Environment and Historic Environment (Consultation Document Section 2.8)

What do you think are the main issues the Council should consider in relation to the natural environment and the historic environment?

Section 11 of the National Planning Policy Framework must be adhered to. Specifically section 112, 'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

Area 9, for example, includes a high proportion of Grade 2 agricultural land. This should be protected.

The assessment process must maintain realism in reviewing routes residents will take to reach key transport hubs, to ensure that historic sites and villages are not 'set up' to become rat runs from any new housing area, as people seek to avoid rush hour congestion on recognised main routes.

A requirement of any development must be the sympathetic incorporation of the "very large number of listed buildings, archaeological sites, conservation areas, and undesignated historic assets." If this cannot be achieved then the site is not appropriate for use.

### Question 9: Other Areas of Search (Consultation Document Section 3)

Are there any other potential Areas of Search not shown in Figure 1 which should be assessed by the Council?

At the moment the A120 is attracting the majority of possible sites for a new settlement, due largely to its perceived accessibility. However, the reality is that the A120 becomes a single carriage bottleneck at the Mark's Farm roundabout to the east of the District. It causes continual road congestion at Braintree, with very limited rush hour accessibility to Braintree rail services.

Greater consideration should be given to areas along M11 routes, where improvements in Jn 8 would offer true accessibility to London by both road and rail from the airport.

### Question 10: New Settlements (Consultation Document Section 3.1)

What do you think about the principle of one or more new settlements in providing for the future development needs of the District?



We believe that this is the wrong approach.

Whilst the simplicity of a single new development is perhaps attractive in decision making, the reality is that individual major new settlements are an unreliable way of providing housing. They cause major upset to the locality, overloading the existing physical and social infrastructures, and are generally delayed and deliver at slower than planned rates. This means that they do not reach a sustainable size for decades, which is often used as an excuse for delaying some of the infrastructure needed to make them a success rather than a burden on nearby settlements and infrastructure.

It is also a reality that small local developments will still be needed in different areas of the District to provide for local needs.

### Question 11: New Settlement Areas of Search (Consultation Document Section 3.1)

What issues and evidence should the Council consider when assessing the potential for one or more new settlements at Areas of Search 1-9? Please reference any specific Areas of Search in your response.

This following applies to Area 9.

Area 9 includes the Parish of Felsted. This area must be considered alongside a major potential area for development released by Braintree for its Local Plan 'call for sites' (map here: <http://maps.braintree.gov.uk/localviewweb/sites/localplancfs/>). There is an identified area which reaches across BDC into UDC land. It adjoins Gransmore Green in the Parish of Felsted and, if adopted, would join the Parish of Felsted with Area 9, Rayne and beyond.

This goes against accepted wisdom to avoid ribbon development and the strong views of the emerging Felsted Neighbourhood Plan to maintain the individuality and separation of villages.

In 2014, an outline planning application for an area south of the A120 towards Flich Green (ref UTT/14/2756/OP), and broadly aligned with Area 9, was rejected on a number of factors, including coalescence. The reasons for this rejection remain valid today for Area 9.

The council should also consider the Felsted Parish plan (link: <http://www.felsted-pc.gov.uk/parish-council/parish-plan/>). This has been **adopted by Uttlesford District Council**. This is very much a live document. It includes an action section covering Housing and Development (page 17) referencing a core principle of the Plan on page 10, that *'The feeling that the parish should remain a group of hamlets in open countryside was emphatically endorsed...'*

A theme running through the plan is the implementation of a neighbourhood plan, which is underway and making significant progress (website: <http://www.felstednp.org.uk/>). In defining the future development needs of the Parish it can already be said with certainty



that a development of 10,000 houses alongside, and potentially reaching into the Parish, would be in direct conflict with the emerging Neighbourhood Plan.

Referring to the Environmental report section 3.9.1, 'likely benefits' of adopting Area 9:

- That development of Area 9 '*Alleviates cultural heritage impacts associated with development of existing settlements.*' Felsted is a Parish of fewer than 1,000 houses at a low density in c15 square miles. Building a development of up to 10,000 houses (or larger if the Braintree Plan site is also considered) adjoining (and potentially partially within) the Parish will change and damage forever the unique character of Felsted and its centre, protected as a Conservation Area and already suffering from traffic congestion. This congestion is at least partially the result of the village layout, being a traditional crossroads, where all traffic flows through the centre. This has already been impacted by the development of Oakwood Park and will be massively impacted by the adoption of Area 9 with traffic looking for routes through the area.
- That '*the potential scale of the development maximises the possibility of housing to be well supported by.....employment opportunities*' and '*the principle of employment development appears suitable in proximity to the A120.*' Whatever is said regarding the potential for new employment, the reality of housing in Uttlesford, and particularly the Felsted area, is that it will attract those who commute. This will involve either driving around or through Braintree to reach the train station, using roads which are already at a standstill during rush hour, or alternatively using the mainline (and planned new) Chelmsford station. London commuters already cause high levels of traffic heading into Chelmsford, again using roads which are already heavily congested. The alternative Chelmsford route to avoid part of this congestion would be to use a route through Felsted, which would turn the village into a commuter 'rat run'.
- That Area 9 benefits '*from access to the A120*', requires qualification. Eastbound A120 traffic does not have an exit here and would likely result in significant congestion from traffic taking the next available exit and having to travel back through Rayne, already 'traffic calmed', to reach Area 9.
- That Area 9 is '*well related to public transport from Braintree and Great Dunmow.*' This is simply not correct. As noted under Q4 and above, Braintree offers only limited rail access to London, with 1 train per hour and extremely limited parking. It must not be assumed that these problems will simply be solved, making it into a station capable of taking even moderate commuter traffic. It is also, even now, extremely difficult to reach Braintree train station due to road congestion.
- That a '*development on this scale would require an increase in GP capacity and healthcare*'. Given the chronic shortage of GPs in the UK, there is no suggestion as to where these GPs would come from. The need for GPs should therefore be regarded as an 'issue to overcome', not a 'likely benefit'.

Referring to the Environmental report section 3.9.1 'potential issues to overcome'. Area 9 includes high quality Grade 2 Agricultural farmland. It also includes Wildlife Sites, Boxted Wood and Moulin Wood. Consideration should be given to the **National Planning Policy Framework, which has 2 specific points where building on Area 9 would be in direct conflict:**

- 109. *The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils.*
- 112. *Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*

In general, looking at all areas, consideration should be given to:

- The impact of a settlement of a given size is going to be much more significant to a village than to a larger village/town
- Rail or light rail (poor accessibility from most of the district to London-Cambridge and London-Chelmsford-Braintree routes; lack of Park & Ride facilities for rail users)
- Access to road routes, specifically into London, Cambridge and Stansted
- Avoidance of building on Grade 2 or above agricultural land
- Avoidance of ribbon development or development which joins onto and overbears smaller village areas
- Areas 1 and 2 offer good access to jobs (Cambridge), rail transport and, with improvements, to roads.
- Area 3 has good rail service. Access to this area by road would need considerable improvement.
- For Areas 4 and 5 access to road and rail is currently poor. Airport employment opportunities are good.
- Further ribbon development along B1256 at Takeley for Area 6 is undesirable and appears unlikely to encourage additional local services.
- Area 7 appears to coalesce Great Dunmow with Little Easton, Tilty and Broxton. The B184 bypass would become a congested 'spine road' for the existing and new developments. No rail access, so this would become an unsustainable extension of the commuter dormitory that is Great Dunmow.
- Area 8: Likely to become a further car-dominated dormitory settlement (no rail access).

### **Question 12: Saffron Walden (Consultation Document Section 3.2)**

What issues and evidence should the Council consider when assessing the potential for urban extensions to Saffron Walden at Areas of Search 10a-g? Please reference any specific Areas of Search in your response.

Most of the proposed locations are on the 'wrong' sides of the town to permit access to the nearest railway station, and would impose unacceptable additional pressure on an already congested town centre.

For the proposed locations to be practical extensions to the town, bypass(es) would need to be constructed, connecting to Audley End station and a new M11 junction, together with a good commuter bus service connecting the edge-of town developments to the centre and station.

**Question 13: Edge of Bishop's Stortford (within Uttlesford District)  
(Consultation Document Section 3.3)**

What issues and evidence should the Council consider when assessing the potential for urban extensions to Bishop's Stortford at Areas of Search 11a and b? Please reference any specific Areas of Search in your response.

Access will require upgrade to M11 Jn8 and improvements to rail link

Rail links to London will require facilities availability at Stansted.

Affordable local bus/Park-and-Ride services would be essential.

Airport employment opportunities good.

**Question 14: Great Dunmow (Consultation Document Section 3.4)**

What issues and evidence should the Council consider when assessing the potential for urban extensions to Great Dunmow at Areas of Search 12a-f? Please reference any specific Areas of Search in your response.

The areas to the north of Great Dunmow (12b and c) are on the 'wrong side' of Dunmow for commuting, and for access to the road and rail network. They are unsustainable without additional road access to the central road and rail network. Developments will inevitably be of predominantly car-using commuter dormitory accommodation, creating unacceptable pressure on town centre roads and facilities.

Area 12a could also result in coalescence with Little Easton.

Dunmow offers access to the A120 and on to M11 and Stansted, for rail links and employment. However, the B1008 road access to Park-and-Ride/station at Chelmsford is inadequate.

### Question 15: Villages (Consultation Document Section 3.5)

What issues and evidence should the Council consider when assessing the potential for development in the villages? Please reference any specific Areas of Search in your response.

It is important that the character of the villages be maintained. The aspects of village life that attract people to the villages require sensitive development if that very attraction is not irrevocably harmed/destroyed.

Important aspects of this are included in the Felsted Parish Plan (link: <http://www.felsted-pc.gov.uk/parish-council/parish-plan/>). This has been **adopted by Uttlesford District Council and so must be considered**. This is very much a live document. It includes an action section covering Housing and Development (page 17) referencing a core principle of the Plan on page 10, that 'The feeling that the parish should remain a group of hamlets in open countryside...' and that development should focus on affordable housing.

Central to many of its actions is the implementation of a neighbourhood plan, which is now recognised as underway and making significant progress (website: <http://www.felstednp.org.uk/>).

In Felsted, the developing Neighbourhood Plan has identified key elements of the village character as being the separation by open countryside of the Parish's fifteen hamlets, and the historic central Conservation Area, including the independent Felsted School and its large open spaces. Felsted's road system is also based on a traditional crossroads layout, with all through traffic funnelled through the centre. This would be massively impacted by the positioning of an adjacent large settlement through the adoption of Area 9.

The impact on all neighbouring villages of the changes to traffic flows, water and electricity supplies caused by large-scale developments has hitherto been underestimated.

### Question 16: Development at 580 dwellings per year (Consultation Document Section 4.1)

What do you think the implications of development would be under scenarios A to D would be, if working to the principle of delivering 580 dwellings per year?

Scenario A: We are against the principle of a single new settlement. We do not believe that it is either the best solution, nor is it an inevitable necessity given that the last 10 years have delivered the required build rate without such a settlement. This scenario will cause the most negative impact on nearby towns and villages, and will require significant infrastructure modification. It removes the ability to respond to smaller local development needs in sensitive ways.

Scenario B: Impact on villages would be too great.

Scenario C: The roads, utilities and facilities of the towns would need substantial enhancement to support this level of expansion.

Scenario D: The most equitable solution, though the capacity of roads in and between the settlements and the strategic transport network would need to be extensively reviewed, together with the capacity of utilities and of bus services etc. Scenario D gives maximum flexibility for villages of all sizes to respond to their own development needs to deliver sustainable growth.

As a general point we believe that only accounting for 50 houses a year 'windfall' is a significant understatement of the houses that will be built to satisfy local needs, irrespective of the strategy adopted. This will reduce the number of houses needed from further developments of any size.

**Question 17: Development at 750 dwellings per year (Consultation Document Section 4.2)**

What do you think the implications of development would be under scenarios E to G, working to the principle of delivering around 750 dwellings per year?

For reasons similar to those in response to Q16, Scenario G (distributed development) would be the least objectionable, but it still includes aspects already rejected above in scenarios A-C and so we do not support any of these scenarios.

Should this option be further explored due to requests to take housing build from adjoining districts then this specific point should be independently reviewed and offered for referendum before agreement, as its impact is so significant.

**Question 18: Other Scenarios (Consultation Document Section 4.3)**

Are there any other potential scenarios not shown which should be assessed by the Council?

House building over the last 10 years has been close to the annual rate identified as required over the new plan period.

A scenario should be developed that replicates this (or is identified from the existing scenarios).

What has worked over the last 10 years is likely to offer a good option to learn from and build upon for future needs.

Consider area west of Audley End.

There are no radical new ideas being considered. Where, for example, is an idea to build based on an M11 spur, with an appropriate rail link delivering road and rail access designed for purpose?

**Question 19: Other points (Consultation Document Section 5.1)**

Are there any other points you wish to make which do not relate directly to the questions above?

No comment.