



FELSTED

PARISH COUNCIL

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Dear Cllr Bagnall,

We found Monday's Zoom meeting to update local Parish and Town Councils on the emerging Local Plan progress and to discuss submissions under "Call for Sites" useful.

However, beyond a general reference to the site assessment process 'needing to reflect the three strategic objectives of the emerging local plan' we noted that no structure or mechanism for the site assessment process was presented. As one of only four Parishes or Towns within Uttlesford with a fully "Made" neighbourhood plan (NP), we were left unclear and therefore concerned that 'Made' neighbourhood plans might not receive the recognition they should, as important constituents of the current Statutory Local Development Plan and what weight they will have on the site assessment process in the new plan.

Felsted Parish Council wishes to make the following comments:

Despite the requirements of Paragraph 65 of the latest iteration (2019) NPPF which obliges LPAs to establish and set out a housing requirement figure for designated neighbourhood areas, during the preparation of the Felsted NP, despite repeated requests, senior UDC officers resolutely refused to provide a number, arguing that they did not supply such figures on a "Parish" specific basis.

The best they could offer was the "Regulation 19 Local Plan" (subsequently stalled) number which was an allocation of 134 dwellings spread across all 19 Type A villages, which would have been 7 for each. For Felsted, 7 would have represented a % increase of around 0.54% additional dwellings.

The FNP is now a fully "Made" plan, less than two years old, meeting all of the requirements of the NPPF making it the most "up to date" component of the Statutory Local Development Plan. The Plan (FNP) supports 63 new dwellings, a circa 5% increase in additional dwellings for Felsted, almost ten times the UDC "Regulation 19" emerging Local Plan number.

You will be aware that neighbourhood planning groups are under no statutory obligation to allocate sites for housing within emerging neighbourhood plans. However, the FNP Steering Group recognised that we should contribute towards the “strategic” District wide housing requirements of both UDC’s 5 YHLS and the identified local housing need.

The fact that UDC was until very recently, unable to demonstrate even a 3 YHLS, when it should have been able to demonstrate a 5 YHLS, had significant consequences for the FNP. In the last 15 months (since April 2020) Felsted has had in excess of 165 new dwellings approved, some by UDC and some on Appeal, including some by UDC even after the FNP was fully Made. This represents a circa 13.2% increase in dwellings. On top of that, the FNP supports a further 24 dwellings which are yet to go through the Planning application stage. Once they are included the increase will be almost 15% overall.

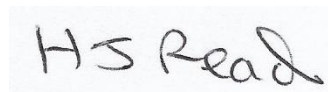
These are not insignificant figures and UDC must respect the FNP which is contributing substantially towards UDC’s “strategic” housing requirements.

It is also relevant to point out that by UDC encouraging and empowering the neighbourhood plan steering group to make appropriate decisions and to understand the planning system, the FNP supported housing located on small or medium sized sites which contribute positively towards meeting local plan requirements (as required by paragraph 68 of the NPPF).

If, as a consequence of the current “call for sites” process, additional sites, particularly sites that were assessed and rejected as part of the Felsted planning process, are identified within Felsted Parish that are not supported by the less than 2 year old fully “Made” FNP, this will be seen as an unacceptable “top-down” allocation by UDC. Not only will confidence in the Neighbourhood Plan process be completely undermined, but serious damage will have been done to how local democracy is perceived. The people of Felsted voted on this plan!

As stated at Monday’s meeting, we do not see the FNP as some sort of “silver bullet” completely eliminating Felsted from all future development, but we do expect our current and ongoing contribution of 63 dwellings, which if added to those already approved in the past 15 months equates to a gross increase of approximately 15% to Felsted’s housing number, to be taken into account. We would therefore request that the Policies within the FNP are included as part of the “Call for Sites” assessment criteria for all submissions within Felsted.

Yours sincerely

A handwritten signature in black ink that reads "H S Read". The signature is written in a cursive, slightly slanted style.

Heather Read
Clerk to Felsted Parish Council