



FELSTED

PARISH COUNCIL

Peter Holt
Chief Executive
Uttlesford District Council
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

URC Hall,
Stebbing Road
Felsted,
Great Dunmow
Essex
CM6 3JD

Office: 07719 552174
Email: clerk@felsted-pc.gov.uk

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Dear Peter,

As a parish, we are attempting to complete a Review of our Neighbourhood Plan. In so doing we are repeatedly asked by parishioners for the District Council's rationale for our housing requirement figure (2021-2041) as published in the Local Plan at 8.2.

Without any other factors, the distribution between the Larger Villages seems inequitable.

The Plan identifies eight 'Larger Villages' required to supply 1,114 homes: Felsted being required to supply 320 homes or 29% of the total required. The next largest contributor is Clavering with a requirement for 199, while some Large Villages are only required to make single figure contributions and smaller villages have escaped any allocations.

The methodology applied to the allocation of housing numbers is entirely mathematically formulaic, gives no consideration to other important factors that impact the lives and well-being of parishioners and condemns communities which have already been forced to grow – against their will - into Large Villages - to an escalating growth cycle.

Had the 600 'residual' homes required been distributed evenly between the four Larger Villages (Not including Henham, Birchanger, Little Hallingbury and Stebbing) in accord with 'Scenario 1A' (Topic paper July 2024) Felsted's allocation would have been 182 new homes. Instead, a population weighted distribution was applied and the allocation more than doubled to 408, before being reduced through averaging (i.e. including scenarios 1B, 2 and 3) to 309 (revised to 320).

Had the 182 figure been applied and the 216 completed and committed been considered, (over 40% of *all* completions in UDC) Felsted would have been 'in credit' to the tune of 34 homes. Instead, we are forced to find a further 93 (now revised upwards to 104) new homes!

The outcome is that, as a Larger Village, Felsted is doomed to become larger still, while some settlements seem to be immune from any development. That is manifestly unfair.

The allocation methodology in the Topic paper is constrained, too narrowly focused and excludes factors other than housing, that impact on the character of the parish and therefore is in conflict with Core Policy 41. For example, we can't see any reference to consideration being given to the NSIP in the Appendix 2 Evidence base for the UDC site allocation.

Felsted now also faces the development of two huge solar parks, one is a NSIP of 650 acres, but together they account for close on a 1000 acres or 15% of the total area of the parish. There is no indication in the Evidence base or the Topic Paper that the impact of the solar parks has even been considered. The Hedgehog Grove site at Watch House and Bannister Greens, in particular, is distorting coalescence policy and making it very difficult for us to justify or rationalise our site assessments, to the public.

The NPPF ([National Planning Policy Framework](#)) planning process is designed to be iterative and intended to ensure plans remain '*up-to-date and relevant*'. As we understand it, this iterative approach is supposed to allow for adjustments based on new evidence and changing circumstances. We would argue that strict adherence to the mathematical formula in the Topic paper mitigates against the intentions of the NPPF.

Whilst we understand and support UDC's pressing need to have a Local Plan approved, that should not preclude the authority from following the fundamental principles of the NPPF and reacting to changing circumstances during the lengthy inspection process.

We note that in the July 2024 Topic paper, the housing numbers are 'recommendations'. We would therefore ask that, in this unique circumstances, where a NSIP has emerged during the course of the LP process, further consideration is given both to the methodology of the allocations and to Felsted's allocation in light of the new evidence of the NSIP and ask that a significant part of the Felsted allocation be redistributed.

Yours Sincerely

Graham Harvey
Chair of Felsted Parish Council

cc District Councillor John Evans
District Councillor Richard Silcock