

Felsted

Neighbourhood Plan

Preferred Sites Justification Report



Felsted Neighbourhood Plan Steering Group

This document has been prepared by Felsted Neighbourhood Plan Steering Group on behalf of Felsted Parish Council. It is submitted alongside the Felsted Neighbourhood Plan to meet the requirements of the Neighbourhood Planning (General) Regulations 2012 (as amended).

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1. Introduction

This report is complementary to and intended to be read in conjunction with the Felsted Neighbourhood Plan (NP), the Felsted NP Basic Conditions Statement, the Felsted NP Consultation Statement, the Felsted Site Assessment Report and the Felsted Viability Report (AECOM), which all form part of the Regulation 15 Submission of the Felsted Neighbourhood Development Plan (2018 – 2033).

1.1 Purpose

The report is made up of 3 parts – the rationale for the proposed allocation of housing sites in Felsted including housing numbers and site assessment summaries, delivery/viability of the sites, and conclusions. It is intended that this report provides evidence and justification for the proposed housing allocations in the NP, in combination with other evidence base documents. The document builds on the site assessment document to set out the rationale for proposed housing allocations within the Felsted NP and how they will be delivered.

As well as providing a summary of the sites assessed for potential allocation this report also sets out the broader rationale for allocating land for housing development within Felsted parish. This makes reference to emerging Local Plan proposals and the pattern of development in Felsted over the last 20 years.

The spatial strategy adopted by the parish council in preparing the plan on behalf of the wider community focusses on a long-term and balanced approach to the future sustainability of the village, making use of the opportunities available with regard to sites but also in terms of the delivery of substantial community benefit.

2. Housing Numbers

2.1 Understanding the development need

The Locality Guidance on site assessment clarifies that before you decide which sites may be suitable for future development, and what type of development would be appropriate, it is important to understand what the development need for the neighbourhood plan area is. Paragraphs 66 and 67 of the NPPF provide for how local planning authorities should support neighbourhood planning groups to meet local need through the provision of a neighbourhood area level housing figure. UDC have not provided a housing target at a neighbourhood-area level for the Felsted NP. Planning Practice Guidance goes on to state:

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.¹

¹ Planning Practice Guidance, Paragraph: 040 Reference ID: 41-040-20160211

To date, UDC have been unable to provide evidence at a neighbourhood area level for Felsted, therefore the following sections set out a locally-specific approach for Felsted that takes account of past completion data, emerging Local Plan evidence base, demographics and locally-specific infrastructure considerations in Felsted.

2.2 Local Plan Requirements

The Regulation 19 Local Plan includes a Settlement Hierarchy across the district. It defines the existing settlements across the district based on an assessment of their facilities, characteristics and functional relationships with their surrounding areas. Each tier of settlement has a different role:

- Market Towns
- Key Villages
- Type A Villages
- Type B Villages

Felsted is included in the Local Plan as a Type A village. There are eighteen other Type A Villages. This categorisation would apply to the development limits that fall within Felsted Village, Causeway End, Watch House Green and Bannister Green. Type A villages have a primary school and some local services and act as a local service centre. They are considered suitable for a scale of development that reinforces their role as a local centre. The Regulation 19 Local Plan provides for up to 134 new homes in new allocations for housing development in the Type A villages (see paragraph 3.37). This includes an allocation for 40 dwellings on land north of Station Road in Felsted village, an allocation for 30 dwellings on land east of Braintree Road and a commitment for the delivery of 22 dwellings at the Former Ridley's Brewery located in the east of the parish. In total therefore the Local Plan plans for at least 70 new homes within Felsted parish during the period 2018 to the year 2033 (70 in addition to the 1184 currently estimated to be in the parish as at 2018 – equating to 1255 by 2033).

Informal conversations between the SG and officers of UDC took place in early 2018 regarding the emerging proposals for the sites in the Neighbourhood Plan, during which it was agreed that if the SG took the lead in proposals for allocations, that UDC would then not seek to allocate over and above neighbourhood plan allocations. It is understood, however, that UDC have been under pressure to bring forward and up-to-date local plan which has not been subject to the same timescales as the neighbourhood planning process in Felsted and that they have needed to progress with a plan to meet identified need across the district. The SG maintain, however, that the approach taken in the Felsted NP is the most appropriate approach to new housing development for Felsted, and there has been significant consultation with the local community on that basis.

2.3 Past completions data in the parish

In 2001, there were 1,035 dwellings in the parish and in 2011 there were 1,122 dwellings representing an increase of 87 dwellings over the 10 year period or 8.7 per year. If this trend of 8.7 completions per year continues then Felsted would have 8.7 x 22 additional dwellings by 2033 (or 191 additional dwellings – equating to 1,313 by 2033).

More recent completions data compiled by the NP steering group show that during period 2011 to 2017 there have been 53 new dwellings completed in Felsted.² At this rate of delivery, which

² Uttlesford District Council, 5 year Land Supply Report, October 2018
[https://www.uttlesford.gov.uk/media/8578/Housing-Trajectory-and-Five-Year-Land-Supply-1-April-2018-October-2018-/pdf/Housing_Trajectory_and_5YLS_Statement_April_2018_\(2016-based_HH_projections\).pdf](https://www.uttlesford.gov.uk/media/8578/Housing-Trajectory-and-Five-Year-Land-Supply-1-April-2018-October-2018-/pdf/Housing_Trajectory_and_5YLS_Statement_April_2018_(2016-based_HH_projections).pdf)

equates to 8.8 new dwellings per year, by 2033 Felsted would have 1,315 dwellings (8.8 new dwellings per year across 22 years). Delivery from years 2011 – 2017 would indicate that the trend between 2001 and 2011 has remained broadly the same.

UDC assume an annual windfall delivery of 70 per annum. Felsted has 3.4 % of UDC’s homes so you could assume a windfall delivery of 2 new dwellings per year in Felsted, taking account of the settlement hierarchy and local constraints. This equates to 44 during the period 2011 to 2033.³

2.4 Ministry of Housing, Communities and Local Government Household Projections

Government advice is that the most recent household projections available should be the starting point for your housing needs assessment. The projections are only available at local authority level, so a pro-rata calculation will have to be made on the basis of population share for the neighbourhood area. The projections are available for households rather than dwellings. To translate future number of households to dwellings, there is a need to divide them by the neighbourhood plan area’s number of dwellings per household in 2011. The 2014 based household projections state that between 2011 and 2033, households within Uttlesford District will grow from 31,569 to 42,996, representing an increase in 11,427 households.

These household projections have been translated into dwelling projections in the 2017 SHMA where 31,569 Uttlesford households in 2011 equated to 33,138 dwellings and where 42,996 households in 2033 equated to 43,503 dwellings.

In 2011, the population of Felsted Parish was 3,051 compared to 79,443 across the district. Felsted’s parish represented 3.8% of the district’s total population. On census day in 2011, Felsted’s household numbers were recorded to be 1,083 and Uttlesford’s household numbers were recorded to be 31,316. In 2011, Felsted parish was home therefore to 3.46 % of the district’s households.

Using the DCLG 2014-based household projections however, the Felsted proportion in 2011 would have been 3.46 % of 31,569 equating to 1092 households in 2011. Assuming Felsted retains this proportion of the district’s household figures throughout the plan period up to 2033, then in 2033 Felsted will have 3.46% of 42,996. This figure equates to 1,488 households.

On census day in 2011, Felsted was recorded to have 1,122 dwellings and 1,083 households meaning there were 0.96 households per dwelling. A projected household figure of 1,488 in 2033 could therefore translate into 1,550 dwellings. This represents a growth of 428 dwellings between 2011 and 2033 (and in 2011, 1092 households would have equated to 1138 dwellings).

A summary of the four different scenarios discussed above is provided in the table below.

Felsted dwelling growth trend	2033 Dwelling requirements in Felsted parish
Actual Completions 2001 to 2011 (assuming delivery at the same rate)	1313 dwellings
Actual Completions 2011 to 2017 (assuming delivery at the same rate)	1315 dwellings
DCLG Household Projections (2014 based)	1550 dwellings
Local Plan Reg 19 requirement (i.e. current estimate of 1184 dwellings plus allocations yet to be built 70)	1254 dwellings

The figure extrapolated from the DCLG 2014 based household projections is neither likely to be appropriate since it completely disregards the emerging spatial strategy of not distributing growth

³ Uttlesford District Council, Housing Supply Windfall Allowance, March 2017
https://www.uttlesford.gov.uk/media/3615/Housing-Supply-Windfall-Allowance-Consideration-of-a-Windfall-Allowance-for-Uttlesford-March-2017/pdf/2017_Windfall_Allowance.pdf

evenly or proportionately throughout the district nor does it take account of specific local circumstances.

The trend indicated by the 2001 to 2011 completions data might provide a more accurate idea of appropriate housing numbers in the parish by 2033, which .

2.5 Identifying an appropriate housing number for the Felsted NP

The 2019 National Planning Policy Framework at paragraphs 65 – 66 states:

65. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³⁰. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

66. Where it is not possible to provide a requirement figure for a neighbourhood area³¹, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

An indicative number for the Felsted Neighbourhood Plan has been sought from the Local Planning Authority, Uttlesford District Council (UDC) but to date no neighbourhood-level housing figures have been provided.

The purpose of this section is to explore what an appropriate housing target should be for the Felsted Neighbourhood Area, to be addressed and planned for through the Felsted Neighbourhood Plan. Having considered four potential growth scenarios set out in the table above, this report now considers:

- Characteristics of the population of the neighbourhood area (including evidence set out in Felsted Housing Needs Survey 2016)
- The role of the neighbourhood area in providing services

2.6 Felsted Neighbourhood Area Demographics

There were 3,051 usual residents as at Census day 2011. Of these, 89.9% lived in households and 10.1% lived in communal establishments.

Felsted's population in relation to the profile of Uttlesford district as a whole is comparatively much older. The average (mean) age of residents was 41.8 years (this compares with an average (mean) age of residents across the district 40.6 years. 20.9% of the parish's population was over the age of 60 at the time of the 2011 Census compared with 17% of the district's population.

In total there were 1,122 household spaces. Of these, 1,083 (96.5%) had at least one usual resident and 39 (3.5%) had no usual residents.

In terms of house sizes, the table below provides an indication of house sizes in the parish compared to the district and the country. The table indicates that the parish is well stocked with larger homes and under provided with smaller homes.

	Felsted		Uttlesford		England	
	No	Percent	No.	Percent	No	Percent
All Household Spaces With At Least One Usual Resident	1083		31316		22063368	
No Bedrooms	0		31	0.10%	54938	0.25%
1 Bedroom	50	4.62%	2258	7.21%	2593893	11.76%
2 Bedrooms	207	19.11%	6601	21.08%	6145083	27.85%
3 Bedrooms	330	30.47%	11375	36.32%	9088213	41.19%
4 Bedrooms	306	28.25%	7456	23.81%	3166531	14.35%
5 or More Bedrooms	190	17.54%	3595	11.48%	1014710	4.60%

Source: Census 2011 Number of Bedrooms (QS411EW)

Meanwhile, 21.3 % of households in Felsted parish are one-person households with 13.3 % of these being aged 65 or over. Of the 71.77 % family households in Felsted parish, 13.8 % are aged 65 or over.

Together with the findings of the Felsted Housing Needs Survey published in 2016, the statistics above indicate a clear evidenced need for smaller homes to come forward in the parish during the plan period. This can be attributed to two factors. Firstly, there are few options for first-time buyers or younger people in Felsted due to the fact that most houses are 3 bedrooms or above. Secondly, there is evidenced demand for opportunities to downsize, established through consultation work undertaken by Felsted Neighbourhood Plan Steering Group and provided in the Felsted Neighbourhood Plan Consultation Statement.

2.7 Local Housing Needs Survey

An Affordable Housing Needs Survey was commissioned by Felsted Parish Council from RCCE (Rural Community Council of Essex) in January 2016. The survey was completed in March 2016. Of 1,085 forms distributed a total of 347 were returned. In summary the findings were:

An identified need for:

- 12 units for open market
- 3 units for shared ownership
- 14 units for affordable housing
- 2 starter homes

A recommendation from RCCE for the delivery of 14 affordable housing units as follows:

- 2 x 2 Bedroom Bungalows on the open market
- 2 x 2 Bedroom Houses on the open market
- 1 x 3 Bedroom Bungalow on the open market
- 1 x 3 Bedroom House on the open market
- 1 x 2 Bedroom House for shared ownership
- 1 x 2 Bedroom physically adapted bungalow at affordable rent
- 2 x 2 bedroom bungalows at affordable rent
- 2 x 2 Bedroom houses at affordable rent
- 2 x 3 Bedroom houses at affordable rent

The report noted “a significant need identified for downsizing accommodation for older residents within the parish, something which should be considered for future development.”

The 2016 Felsted Housing Needs Survey represents a snap shot in time and it is generally recommended that they are updated every 5 years. The need set out above indicates existing need for housing in the parish rather than need for a longer duration.

2.8 The role of the neighbourhood area in providing services

This section sets out how Felsted functions as a place, which helps to identify specific infrastructure and local circumstances which affect the supply of housing land and how much development may be reasonably accommodated in Felsted over the plan period.

Community Facilities

The Parish is well-served by amenities which are highly valued by the community. There is a doctors' surgery and dispensary, a highly regarded village shop and Post Office, two pubs – both serving food and one offering accommodation - an active branch of the Royal British Legion, a Chinese restaurant, an Indian restaurant, a tea shop and patisserie, a local estate agent, a hairdressers and beauticians, a farm shop and two further retail outlets in the village centre. Bed and breakfast accommodation is also available in the village centre and elsewhere in the Parish.

The Parish has a much-loved Memorial Hall which is some 90 years old and a village playing field with excellent and exciting modern play facilities for children. There are also play areas at Watch House Green and Willows Green.

Getting Around

From a transport perspective, the parish is not a sustainable place for focusing large amounts of growth. The only A road passing through the Parish is the new A120. Most of the northern boundary of the parish is formed by the B1256 (the old A120). The B1417 is the main north-south route through the Parish linking with the B1008 to the south and the A1256 in the north-west and directly to the A1256 and indirectly to the A120 in the north east. The main junction in the Parish is in the centre of the village where the B1417, the Chelmsford Road meets Station Road and Braintree Road.

The Parish is however served by some limited public transport infrastructure. The 16 bus runs four times a day between Chelmsford and Wethersfield via Felsted. The 133 bus also runs through the village centre providing an hourly service from Colchester to Stansted Airport, where there are connections to the wider transport network.

Source of employment

The parish is home to one state primary school and one highly regarded 450 year old independent HMC school for boys and girls aged four to eighteen, based on a safe, rural 80-acre village campus. It offers day, full and part-time boarding options with daily bus routes from across the region.

Together the schools serve as the largest employers in the parish.

The Felsted Parish Plan published in 2012 reports a relatively high level of overall employment in the parish:

“Around 900 people were employed by the businesses surveyed in 2013, more or less the same number employed in 2012. The majority were in the 20-59 year age group, with rather more full-time than part-time employees. 29% of those employed were in the professional or managerial category,

with a further 50% divided evenly between manual, skilled manual and clerical categories. A small percentage of technical staff were also employed. 27% of those employed live in the Parish of Felsted, with a further 65% living within a ten-mile radius. Relatively few employees experienced difficulties in finding affordable housing in the locality (11%) or were unable to keep their job owing to transport problems (4%)” (Felsted Parish Plan, 2012)

Supply-Side Constraints

Felsted is considered to have many constraints on growth and this is reflected in the spatial strategy of both the adopted and emerging draft Local Plan. As a Type A Village, Felsted is relatively low in the Settlement Hierarchy where development only suitable to reinforcing the role of the parish in that Settlement Hierarchy is would be supported in the Local Plan. Also, of key consideration is the limitations the parish has in terms of public transport infrastructure. This limits the amount of development that could come forward.

On the other hand, there is availability of sites within the parish and this is demonstrated through the 2015 Call for Sites exercise. Some of these sites have been identified by UDC in its 2015 site assessment work to be potentially sustainable, achievable and deliverable but nevertheless not proposed to be allocated in the draft Local Plan. These sites have been reviewed in order to identify sites that could contribute positively to the delivery of the NP vision on the one hand and qualify as sustainable development in line with national government policy and guidance on the other.

2.9 Drawing conclusions on the quantity of housing needed in Felsted Parish

This document has explored some of the ways in which housing growth in Felsted can be determined. Although it is not possible to arrive a definitive numerical target, a number of conclusions can be drawn:

- There is strategic need for additional housing growth across Uttlesford District as set out in the Regulation 19 Local Plan, this strategic need includes a need for a contribution to that growth from Felsted (owing to strategic lack of 5 year supply of deliverable sites and figures published in the Planning for the Right Homes in the Right Places document).
- There is local need for housing growth and additional provision for housing suitable to current and future demographics in Felsted.
- It is highly likely that development will take place in the Plan period in Felsted (evidenced by market demand of high prices and high yields).
- Development should be Plan-led, and the NP is seeking to achieve this and contribute to the achievement of sustainable development in Felsted.
- In the absence of neighbourhood-level housing targets specified by the UDC, this report identifies appropriate level of growth for Felsted parish during the period 2011 to 2033 to be above 123 but below 193. 123 new dwellings represent the strategy presented in the emerging Local Plan (approximately 70 through new allocations plus 53 completed dwellings in the period 2011 to 2017/18). 193 is a maximum figure based on an assumption (based on past completion figures 2001 to 2011 and an assumption of a continued rate as indicated by the completions of 2011 – 2017/18) of the parish delivering 8.7 – 8.8 new homes per year. Once the 2011 to 2017/18 completions (as recorded in UDC monitoring reports and 5-year land supply reports) have been taken account of this translates to a range of 70 to 140.
- The above range of 70 – 140 provides a range of new dwellings but does not take account of the delivery of windfall sites that have come forward already and are likely to come forward over the plan period. As stated above, the assumed windfall rate of delivery would provide an additional 30 dwellings over the plan period. This would contribute an additional 30

dwellings across the plan period above any allocations made in the Felsted Neighbourhood Plan.

3. Proposed Housing Sites and Justification

This section sets out a summary of the site assessments conducted by the SG as part of the preparation of the neighbourhood plan and the justification for the sites being proposed for allocation in the submission draft plan.

3.1 National Planning Policy Context

The Felsted Neighbourhood Plan Basic Conditions Statement which forms part of the Regulation 15 submission provides full details of how the neighbourhood plan has appropriate regard to the National Planning Policy Framework as required by the Basic Conditions.

Chapter 5 of the Revised National Planning Policy Framework (NPPF) (2019) *Delivering a sufficient supply of homes* sets Government's expectation of how the supply of housing is to be significantly boosted through the planning system.

Paragraphs 65 and 66 of the NPPF identify the role of the Local Planning Authority in helping groups preparing neighbourhood plans where they are seeking to identify land for housing development. Paragraph 65 states that the strategic policies of the development plan should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant / existing allocations. Once the strategic policies have been adopted, these figures would not need re-testing at the neighbourhood plan examination stage. Paragraph 66 states that where it is not possible to provide a neighbourhood area level target, Local Planning Authorities should provide an indicative figure if requested to do so by the neighbourhood planning body.

The Felsted Neighbourhood Plan Steering Group approached Uttlesford District Council (UDC) as the Local Planning Authority in order to obtain a housing target for the Felsted Neighbourhood Area, however UDC are unable to provide a target or indicative figure at this time. The Steering Group, on the advice of a planning consultant and through discussion/agreement with UDC prepared a bespoke methodology for the Felsted NP, which was consulted on at Pre-Submission Consultation Stage and received no objection from statutory consultees.

Paragraph 69 provides for how neighbourhood planning groups should assist in boosting the supply of new housing through allocating small and medium-sized sites. The Government's support for neighbourhood planning groups playing a role in housing delivery is further supplemented by additional funding being made available to those groups wishing to allocate sites for housing development.

Paragraph 77 states that consideration should be given to the delivery of housing in rural areas where the delivery supports and enhances local communities. Specifically, planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

In considering sites for allocation for housing, the Steering Group has had appropriate regard to national planning policy and the guidance offered for those neighbourhood planning groups wishing to promote sites for housing development through the neighbourhood planning process.

3.2 Local Planning Policy Context

The extant Local Plan for Felsted is the Uttlesford District Council Local Plan (adopted in 2005). Full details of how the NP is in general conformity with the policies contained within the development plan are set out in the Felsted Neighbourhood Plan Basic Conditions Statement. For the purposes of housing, however, this Plan is considered out of date and does not provide any context for the level of housing delivery in Felsted.

On 18 January 2019, Uttlesford District Council submitted a new Local Plan to the Secretary of State for Housing, Communities and Local Government and the Examination in Public is expected to take place in due course. For the purposes of this document, it is prudent to take account of the new draft Local Plan as this provides the most update position on housing need and land availability/assessment for Felsted. This section sets out the rationale for the proposed allocations in the neighbourhood plan, including how the NP relates to the emerging proposals in the in the new local plan.

In September 2017, Government published the “Planning for the Right Homes in the Right Places” document for consultation,⁴ which included housing need figures using a standardised methodology for each local planning authority area in the country. In this document, the housing figure for Uttlesford was higher than in the recently published Regulation 18 UDC Local Plan. As such, UDC had to revise their overall housing requirement and make revisions to the draft spatial strategy in order to be able to re-consider SLAA sites and propose sites for allocation within Type A villages, where this had not been the case in previous iterations of the draft Local Plan.

Felsted is a Type A village and is characterised by having a local primary school and some local services. Type A villages act as a local service centre and are suitable for a scale of development that reinforces their role as a local centre. The Regulation 19 draft Local Plan states that there will be development of 134 new dwellings across all of the Type A villages during the plan period.⁵ Up until this point, the Felsted Neighbourhood Plan Steering Group had not given consideration for proposing sites for housing development due to significant local opposition to the development of new housing in Felsted. This was with the exception of the proposal for a new community hub (now discounted) which included some market housing to act as an enabler and support the viability of the scheme.

However, following discussions with UDC, and giving consideration to the likelihood that a new iteration of the draft Local Plan would include proposed allocations in Felsted, the Steering Group committed to making the most of any new development in Felsted through securing long-lasting and significant community benefit to be delivered by new housing developments. The absence of a Community Infrastructure Levy regime within Uttlesford provides further justification for the weight attached to community benefit as part of the site assessment process. It is crucial that any new developments in Felsted contribute to the sustainability of the parish and do not exacerbate existing issues, particularly around health service provision and traffic congestion associated with schools.

The Steering Group resolved to undertake its own site assessment process based on and on site assessments completed by UDC of SLAA sites within Felsted. Two additional, non SLAA, sites were assessed using the same criteria for SLAA site assessments. In addition to the criteria used in the SLAA, of fundamental importance to the SG is that any new development in Felsted should be accompanied by the delivery of significant community benefit. Using a strategic approach, based on the Felsted Neighbourhood Plan Vision and the views and concerns expressed by local residents during the extensive consultation and engagement work done on the Plan, sites were considered within the context of their ability to deliver on the aspirations of residents or to solve ongoing issues

⁴ Department for Communities and Local Government (now MHCLG), Planning for the Right Homes in the Right Places Consultation Proposals, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

⁵ Uttlesford District Council Regulation 19 Local Plan, page 25, <https://www.uttlesford.gov.uk/mwg-internal/de5fs23hu73ds/progress?id=8Yazlon0W72NhBeABehhVsNkm1wDNtGLsivoKI09iGs,&dl>

that are undermining the quality of life in Felsted. Additional criteria relating to the vision of the neighbourhood plan and derived from results of consultation and engagement were added to the UDC site assessments in order to ensure that the right type of development comes forward in Felsted, as outlined by residents as key stakeholders.

3.3 Felsted NP Site Assessment Summary

The sites assessed by the SG are as follows:

Site Reference	Scoring	Conclusion
01Fel15	Amber	Potentially Suitable
04Fel15	Amber	Suitability unlikely
05Fel15	Amber	Suitability unlikely
06Fel15	Amber	Potentially Suitable
12Fel15	Green	Site approved on Appeal for 9 dwellings
13Fel15	Red	Not suitable
14Fel15	Amber	Suitability unlikely
15Fel15	Amber	Suitability unlikely
16Fel15	Amber	Suitability unlikely
17Fel15	Amber	Suitability unlikely
18Fel15	Amber	Achievability unlikely
19Fel15	Amber	Potentially suitable
20Fel15	Amber	Potentially suitable
Edwards House site	Red	Unavailable
Memorial Hall site	Red	Unavailable

The site assessment conclusions for the Felsted Neighbourhood Plan show that of the assessed sites, 12 are concluded as amber, but all have some issues and on-site constraints. Of these 12 sites, 4 are considered to be potentially suitable as the issues and constraints can potentially be mitigated by appropriate careful design and landscaping, they can deliver community benefit, consistent with the aspirations of the community and contribute to the future sustainability of the Parish.

As mentioned in the Site Assessment Report and in this report, the SG consider that in order to ensure that new development is locally appropriate and makes a contribution to local sustainability, the developments that come forward in Felsted should demonstrate and include significant community benefit.

Sites proposed for allocation in the Felsted Neighbourhood Plan are a result of the SG expending considerable time and effort to bring forward schemes to meet identified local and strategic housing need and that also help to maintain Felsted as a sustainable place to live by ensuring that they help to deliver the Vision for Felsted, in particular by ensuring continued access to a locally based doctors' practice and by mitigating traffic congestion.

3.4 Relationship to the Emerging Local Plan

There are a number of key considerations for the Steering Group to address which relate to how the neighbourhood plan interacts with the draft Local Plan, which in turn could impact on Basic Conditions considerations for the purposes of the independent examination of the neighbourhood plan and the Examination in Public of the Local Plan. These are as follows:

- **The overlap between the site in the emerging Local Plan and in the NP.**

One of the proposed housing sites in the Felsted Neighbourhood Plan (Bury Farm, Policy HN3), is being proposed for allocation in the draft Local Plan (Policy FEL 1). The proposed Local Plan allocation states that:

Land north of Station Road as shown on the Policies Map is allocated for development of approximately 40 houses, community uses and open space.

Detailed proposals that comply with other relevant policies and meet the following site specific development requirement will be permitted:

- 1 The development provides for a mixed and balanced community;*
- 2 Development respects the amenity of existing dwellings adjoining the site;*
- 3 The development is designed to mitigate adverse effects upon existing residential and community interests and may be required, by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact;*
- 4 A Transport Assessment may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority;*
- 5 A Landscape and Visual Impact Assessment will be required and should inform the design and layout of the site proposals.⁶*

Whilst UDC have undertaken an assessment of the site based on the SLAA and other relevant criteria, the SG has been engaged in substantial ongoing discussions with the site promoters in order to ensure that the development of this site delivers significant community benefit. The outcome of those discussions has been the agreement between the developer, the landowner, the Steering Group, the doctors' surgery and West Essex Clinical Commissioning Group that the site will deliver a new doctors' surgery to meet the existing and future needs of the community. The surgery and land will be gifted to the parish through the Felsted Community Trust and will generate income to support other community projects to be delivered by the Trust. In addition, open space will be included as part of the scheme in order to minimise risk of coalescence, identified by UDC and the SG as a constraint of this site as part of the assessment process. This is duly reflected in Local Plan Policy FEL 1 through the inclusion of the wording "community uses and open space".

The deliverability and viability of the scheme has been tested by the developer of the site and the SG has also commissioned independent viability work which is submitted as supporting evidence for the Plan (see Section 4). An outline planning application for the delivery of this scheme has been submitted by the developer, reference UTT/18/2508/OP. The Steering Group acknowledges that the capacity of the site has been reduced by 2 units to 38, but also note that the proposed Local Plan allocation states that the site will deliver approximately 40 houses. It is considered that the delivery

⁶ Uttlesford District Council Regulation 19 Local Plan, page 203, <https://www.uttlesford.gov.uk/mwg-internal/de5fs23hu73ds/progress?id=8Yazlon0W72NhBeABehhVsNkm1wDNtGLsivoKI09iGs,&dl>

of a new doctors' surgery and onsite greenspace fully meets the draft Local Plan site development requirements to deliver on community uses and open space.

- **The decision to proceed with a site that is not identified as a preferred site in the Local Plan**

The Felsted Neighbourhood Plan proposes the allocation of Sunnybrook Farm (Policy HN2) for housing and mixed use (a car parking scheme and open/play space). The UDC SLAA assessments for this site both concluded that the site is available, suitable and deliverable but was discounted because of the impact on coalescence (SLAA references 19Fel15 and 20Fel15). However, the Plan addresses this issue, and the value of the extensive car parking facility as an amenity, which addresses congestion caused by school traffic as an issue of community concern, was not at the time available for consideration.

Planning Practice Guidance states:

*A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.*⁷

After the publication of the Planning for the Right Homes in the Right Places consultation document, the SG acknowledged that it was likely that sites previously discounted in Felsted would be re-considered in order to meet the Objectively Assessed Need figure for Uttlesford arising from the new standard methodology. UDC were notified soon after that the SG were re-considering the position of not allocating new housing development sites and the SG sought to work with UDC on emerging proposals. It was the intention that the SG would take the lead in assessing and proposing sites for allocations, and both parties were in agreement on the proposal for the Bury Farm site (NP Policy HN3 / Local Plan Policy FEL 1). No agreement was made on how to approach the potential conflict between emerging Local Plan and Neighbourhood Plan proposals.

The Steering Group undertook its own site assessments for all SLAA sites (see FNP Site Assessment Report) and considered that the site can help to meet housing need at the same time as delivering significant community benefit through a parking and traffic management scheme to alleviate the significant levels of congestion found at Felsted Primary School. It is considered an appropriate alternative to the site promoted by UDC in the draft Local Plan (Policy FEL 2).⁸ Subject to mitigation measures to address identified constraints.

The SG's assessment of this site (Scheme 2: SLAA 20Fel15) concludes:

Subject to development being limited in size to reduce coalescence impact development by limiting numbers to approximately 20, development is considered potentially suitable. Negatives relating to coalescence and conflicts with the Felsted Heritage and Character Assessment could be overcome through careful design, layout and landscaping. The site offers significant potential benefits to the community as this is the only site in the Parish that can provide alleviation of the significant issues around parking and drop off / collection at the Primary School.⁹

The site assessment process concludes that although there are specific on-site issues for Sunnybrook Farm that should be addressed, these issues are much the same as those identified for Bury Farm, in that risk of coalescence with neighbouring settlements can be mitigated through sensitive design and landscaping.

⁷ Planning Practice Guidance, Paragraph: 044 Reference ID: 41-044-20160519

⁸ Uttlesford District Council Regulation 19 Local Plan, page 204, <https://www.uttlesford.gov.uk/mwg-internal/de5fs23hu73ds/progress?id=8Yazlon0W72NhBeABehhVsNkm1wDNtGLsivoKI09iGs,&dl>

⁹ See Felsted Neighbourhood Plan Site Assessment Report, Section 3.

At Pre-Submission Consultation stage, UDC raised no objection to the site being proposed for allocation in the NP. However, concern was expressed regarding the deliverability of draft Policy HN3 (Bury Farm), and it is appropriate that concerns regarding the deliverability / viability of schemes proposed in the NP are duly addressed at the plan-making stage, in accordance with Planning Practice Guidance.¹⁰ Deliverability of the site is discussed further in Section 4.

It is noted that the Neighbourhood Planning Basic Conditions state that the Neighbourhood Plan should be in general conformity with the **strategic policies** of the development plan for the area. As highlighted in the Felsted NP Basic Conditions Statement, the purpose of the word “general” is to introduce a degree of flexibility. Planning Practice Guidance establishes how relevant bodies should seek to determine general conformity.¹¹ At the time of preparation, the Local Plan for Uttlesford is the 2005 Local Plan. However, in accordance with Planning Practice Guidance, the SG has also had regard to the emerging policies of the draft Local Plan so as to ensure that the Neighbourhood Plan does not become out of date on adoption of the new Local Plan.¹²

Before submitting the draft Local Plan to the Secretary of State, between 16 October and 27 November 2018, Uttlesford District Council undertook a further consultation on an Addendum of Focussed Changes to the draft Local Plan. Appendix 1 to the Addendum document contained a schedule of Strategic Policies, including a methodology for determining whether a policy is considered to be strategic (in line with NPPF and NPPG principles).¹³ Page 23 of the Addendum document contains UDC’s assessment of the proposed Felsted Housing Development Allocations. **The assessment of Policies FEL 1 and FEL 2 concludes that they are not strategic policies.** The SG therefore concludes that there are no issues of general conformity relating to the proposal for the allocation of Sunnybrook Farm (HN2) for housing and mixed-use development in the neighbourhood plan as there is not an identified conflict with emerging proposals in the draft Local Plan however the SG does acknowledge that there are uncertainties regarding the relationship between both draft Plans.

Proposals for this site have been developed using a collaborative which meets housing needs (the development will comprise a mix of bungalows, an identified and significant need in Felsted), alleviates congestion issues around the Primary school, and provides open space accessibility to the children at the school. Onsite constraints have been mitigated through the introduction of policies to ensure positive design and landscaping which will manage the visual transition between the site and the surrounding landscape. Development of this site will help to deliver the Vision for Felsted and help improve the sustainability of our Parish for the next 15 years and beyond.

- **The decision to exclude a preferred site in the emerging Local Plan.**

Planning Practice Guidance states:

If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.¹⁴

¹⁰ Planning Practice Guidance, Paragraph: 002 Reference ID: 10-002-20180724

¹¹ Planning Practice Guidance, Paragraph: 074 Reference ID: 41-074-20140306

¹² See Felsted Neighbourhood Plan Basic Conditions Statement, Section 2.3.

¹³ Uttlesford District Council, Addendum of Focussed Changes to the Regulation 19 Local Plan, https://www.uttlesford.gov.uk/media/8585/Addendum-of-Focussed-Changes-to-the-Regulation-19-Local-Plan/pdf/Addendum_of_Focussed_Changes_to_Reg_19_LP_October_2018.pdf

¹⁴ Planning Practice Guidance, Paragraph: 043 Reference ID: 41-043-2014030

As acknowledged previously, although it was the understanding of the SG that allocations would be proposed through the neighbourhood plan and supported by the local plan; time, resource and housing supply pressures have made it more difficult for UDC to rely on emerging proposals in the neighbourhood plan. The SG has therefore sought to bring forward proposals that are viable alternatives to those included in the draft Local Plan, and give reassurance to the neighbourhood plan examiner that the neighbourhood plan is deliverable. The neighbourhood plan proposals have been consulted on by the SG both formally and informally which has helped to build local support for the proposals. They represent a locally-distinctive way of meeting identifying housing needs and delivering the Vision for Felsted by ensuring that new development brings with it significant community benefit to improve local sustainability now and into the future.

As per the SG's methodology, the site proposed by UDC as a housing development allocation of 30 units (Policy FEL 2, SLAA site 17Fel15), was assessed. The site assessment concluded that the site should come forward as a rural exception site and remain outside of Felsted's development limits until a sufficient level of need for affordable or specialist housing is identified. UDC's own SLAA assessment process resulted in site in question being proposed for 5 market housing units and a 120-bed care home. The SG considers that should the land at Watch House Green be allocated through the Local Plan process, this would represent an unacceptable and unsustainable form of development in Felsted. The SA conclusions for the Watch House Green Site (FEL 2) recognise that the site would represent encroachment onto the countryside. The SG considers that insufficient justification is provided in support of this site.¹⁵

As stated above, Appendix 1 to the Addendum of Focussed Changes document contained a schedule of Strategic Policies. Page 23 of the Addendum contains UDC's assessment of the proposed Felsted Housing Development Allocations. **The assessment of Policies FEL 1 and FEL 2 concludes that they are not strategic policies.** The SG therefore concludes that there are no issues of general conformity relating to the decision to exclude the proposed site at Watch House Green from the neighbourhood plan process, irrespective of its inclusion in the emerging Local Plan.

Additionally, planning permission on this site was refused in November 2018 (application reference: UTT/17/2400) by UDC's Planning Committee (date: 21/11/2018).¹⁶ The Committee acknowledged the work being put into preparing a neighbourhood plan for Felsted and considered that this proposal would undermine the work on the Neighbourhood Plan.

The SG maintains that this site should come forward at a future date as a rural exception site for affordable housing and associated enabling development, if required and justified through an up to date assessment of affordable housing need. The SG and the Parish Council will continue to object to the site's inclusion within the draft Local Plan, and will appear at the Local Plan Examination in Public if necessary in order to make verbal representations to the Inspector to the same effect.

The SG has planned positively for the future development needs of Felsted in a manner that brings the most benefit from proposed developments to ensure that new developments make a positive contribution to the future sustainability of Felsted.

- **The possible implications of the above on the potential amount of new housing growth in the neighbourhood area.**

The SG maintains that the approach taken to site selection within the Felsted NP site assessment process is robust and that the sites proposed in the Felsted NP represent the most suitable

¹⁵ Sustainability Appraisal of the UDC draft Local Plan, https://www.uttlesford.gov.uk/mwg-internal/de5fs23hu73ds/progress?id=2i9HxGB_Wvh8GPhcA5abocPadwCtLJOo80plVvzCR4o,&d/

¹⁶ Uttlesford District Council's Planning Committee, 21 November 2018 Minutes, <https://uttlesford.moderngov.co.uk/ieListDocuments.aspx?CId=138&MId=4035&Ver=4>

development pattern for Felsted for the next 15 years. The proposal for development at Watch House Green (draft Local Plan Policy FEL 2) does not appropriately reflect the work undertaken by the SG in order to define sustainable development in Felsted, plan positively for it, nor the work that has been invested in order to bring forward proposals.

The SG's positive approach to development is sufficiently explained within the Felsted Neighbourhood Plan, which recognises that there is very strong local opposition to new development. The UDC draft Local Plan proposes development of 70 new dwellings in Felsted up to 2033 (although does not set out a rationale for this number but relies on the spatial strategy), and the Felsted Neighbourhood Plan plans for 63 new units. As identified in Section 2, there have been 53 completed units in the Parish between 2011 and 2018/19 and an assumed windfall rate of 30 new dwellings over the Plan period.

Any further development than what is proposed in the Felsted Neighbourhood Plan and identified above could cause significant harm to the quality of life of Felsted's residents. The development proposed in the neighbourhood plan meets identified need and also seeks to deliver significant community benefits which will contribute to local sustainability and place-making.

- **The associated impacts of the operation of Section 38(5) of the Planning and Compulsory Purchase Act 2004 where there may be a conflict between a neighbourhood plan and a local plan.**

Planning Practice Guidance states very clearly that a neighbourhood plan can be brought forward in advance of a Local Plan being adopted.¹⁷ Guidance also states that the Local Planning Authority should work with the qualifying body to produce complementary Local and Neighbourhood Plans.

The SG reiterates the importance of collaboration in the neighbourhood and local planning processes. Felsted Parish Council submitted objections to the proposal for the Watch House Green site (UTT/18/2400) which set out how the neighbourhood planning process could be completely undermined by the pursuit of development of this site. This was duly recognised by UDC's Planning Committee, who resolved to support the neighbourhood plan over the proposals for this site. A logical and consistent next step would be for UDC to seek to address this issue in the Local Plan. The SG considers that it has duly met all its obligations to prepare a neighbourhood plan that supports sustainable development in Felsted, and sets out realistic, suitable and deliverable policies and proposals that deliver this.

The SG intends to continue working with UDC to minimise risks of the Local Plan superseding the Neighbourhood Plan.

A Statement of Common Ground has been prepared jointly between Felsted Parish Council (the Qualifying Body) and Uttlesford District Council (the Local Planning Authority) to set out the main points of agreement between both parties with regard to the submission of the Felsted Neighbourhood Plan.

It is the intention that the Statement of Common Ground (Appendix 1) assists the independent examiner of the Neighbourhood Plan and Inspectors for the Uttlesford District Council Local Plan. It will be submitted as part of the examination of both plans.

¹⁷ Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20160211

4. Deliverability and Viability

Neighbourhood Plans must meet the Basic Conditions before they can proceed to referendum. Paragraph 16 of the National Planning Policy Framework establishes that Plans should be prepared positively, in a way that is aspirational but is also deliverable.¹⁸ Additionally, Planning Practice Guidance states that if the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable.¹⁹ The NPPF requires that the sites and scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

The policies in the Felsted Neighbourhood Plan require considerable significant community benefits to be delivered alongside the proposed development sites, and that this may call into question whether the projects are feasible, and that development can come forward viably. The SG has paid due consideration to this factor which is why the proposals in the neighbourhood plan have been developed in a collaborative way with the developers for each housing site.

The policy wording has been subject to extensive consultation with key stakeholders to ensure that they are flexible enough to allow the developments to come forward. In order to further evidence to the neighbourhood plan examiner and future plan users that the proposals in the plan are deliverable, in the summer of 2018 the SG commissioned AECOM to conduct a viability study of options within the neighbourhood plan. The SG has also requested that the developers of each proposed site produce their own viability work which is included at section 4.2 below.

4.1 AECOM Felsted Viability Study (October 2018)

In 2018, the Steering Group commissioned AECOM, through Locality's neighbourhood planning support programme, to undertake a viability assessment of the neighbourhood plan's proposals in order to demonstrate that the proposals are viable. Planning Practice Guidance states that it is the responsibility of plan-makers to ensure that proposals are viable, particularly where plans are asking for contributions for any additional infrastructure.²⁰

In January 2019, the SG received the final report by AECOM, which is submitted as evidence alongside the Neighbourhood Plan and other submission documents under Regulation 15 of the Neighbourhood Planning (General) Regulations (2012) (as amended). It is not the intention of the SG to repeat the details of the report, but it is pertinent for this document to highlight key aspects of the report in order to provide clarity on the viability of the neighbourhood plan's proposals.

Section 6.1 of the AECOM Viability report outlines how the viability appraisal results are to be interpreted:

6.1.1 The development appraisal model builds in the build costs, abnormal costs, and infrastructure costs and financial assumptions for the scheme. The results are summarised in this section deploying a colour coded Red, Amber, Green scoring:

Green Viable – where the Residual Value per hectare exceeds the indicative EUV+ (Threshold Land Value) per hectare (being the Existing Use Value plus the appropriate uplift or premium to provide a competitive return for the landowner).

¹⁸ National Planning Policy Framework, paragraph 16

¹⁹ Planning Practice Guidance, Paragraph: 005 Reference ID: 41-005-20140306

²⁰ Planning Practice Guidance, Paragraph: 002 Reference ID: 10-002-20180724

□□ **Amber Marginal** – where the Residual Value per hectare exceeds the Existing Use Value or Alternative Use Value, but not the EUV+ per hectare. These sites should still be considered unviable when measured against the test set out – however depending on the nature of the site and the owner it may come forward with some amendments if it is close to the EUV+.

□□ **Red Non-viable** – where the Residual Value does not exceed the EUV or EUV+. These sites should not be considered deliverable and the Qualifying Body should consider carefully if it developable during the entire plan period.

Section 6.1 then goes on to provide a summary/conclusion of the viability for proposed housing sites. Policy HN2 (Sunnybrook Farm) is concluded as having marginal viability where the scheme would include 40% affordable housing on the site, and is concluded as being fully viable without a 40% affordable housing commitment. Ongoing discussions with UDC have indicated that they would be willing to commute the 40% affordable housing requirement on this site in lieu of the alternative community benefits being provided by the scheme. Affordable housing need in Felsted is considered to have been met through developments elsewhere.²¹ It is therefore considered that the proposal for the site in the neighbourhood plan is demonstrably viable.

In respect of Policy HN3 (Bury Farm) of the Neighbourhood Plan, the AECOM viability assessment concludes that the scheme is viable irrespective of the requirement to include 40% affordable housing on the site. Again, discussions have taken place with UDC in order to commute the affordable housing requirement in lieu of the alternative community benefits being delivered by this scheme.

4.2 Delivery of Community Benefits

It is acknowledged that the community benefits offered by each of the schemes could call into question whether or not the proposals are deliverable. The SG has ensured that the commitments made by each developer are deliverable and will be delivered as part of the development of each site. In addition, key partners have been identified for each of the schemes, notably the Clinical Commissioning Group and Felsted Primary School and the SG has sought to work alongside those partners to ensure that the community benefits proposed are supported and to give assurance to all stakeholders regarding the delivery and financial mechanisms.

Felsted Primary School are supportive of the proposals for the Sunnybrook Farm site in order to help alleviate traffic and parking issues at the Primary School. The SG has had direct discussions with the school head as a result of which the Plan includes additional facilities for the school. Three Primary School governors sit on the Steering Group and act as a liaison as the scheme is developed.

The West Essex Clinical Commissioning Group have been instrumental in helping the SG to bring proposals for the Bury Farm Doctors' Surgery forward. The CCG have been party and have led discussions with the developers of the Bury Farm site to give certainty to John Tasker House regarding the proposals. Additionally, their appointed consultant has worked with the developers of the site in order to submit the planning application UTT/18/2508/OP. The Chair and Deputy Chair of SG have participated as appropriate in those discussions.

4.3 Developers' Delivery of Community Benefits

The Steering Group has been engaged in ongoing and positive discussions with the promoters of both sites in order to ensure that proposals are joined up and complimentary and to provide residents with certainty that the community's interests are being represented as schemes are brought forward. The working relationships between the developers of both schemes have been constructive and the SG is now confident that the proposals outlined in the neighbourhood plan are deliverable and achievable.

²¹ See Felsted Neighbourhood Plan, section 5.2

The representatives for each site were consulted on the proposals before the formal consultation at Pre-Submission stage, and again as part of the Pre-Submission Consultation. Their support for the neighbourhood plan's proposals are detailed in their individual representations, submitted in evidence as part of the Felsted Neighbourhood Plan Consultation Statement.²²

A summary of the discussions with the agents acting on behalf of both landowners, in advance of the submission of the neighbourhood plan, is as follows:

Sunnybrook Farm (FEL/HN2)

A key component of the strategy behind the Felsted Neighbourhood Plan, and the proposed allocation of Sunnybrook Farm for housing development, is to enable the provision of a car park with kiss and drop facility to help solve the parking and congestion problems associated with the Primary School. The construction of the car park will come at a significant cost, influenced by the level of design specification required, including matters such as surface treatments, landscaping, drainage, access, lighting, and health and safety requirements. The funding of off-site measures may be needed to further prevent on street parking. It is also possible that a one off financial contribution may be sought towards the future maintenance of the car park area.

The revenue from the housing development will need to be sufficient to cover all costs including those necessary to meet any planning policy requirements (unless commuted for viability reasons). Predicted revenue will depend on matters such as the number, size and tenure of the residential units. The AECOM viability assessment concludes that the scheme's viability would be marginal at the LPA's policy compliant levels of affordable housing. In turn, the supporting text to Policy HN2 recognises that due to the provision of the parking and kiss and drop facilities, the viability of the overall scheme is dependent on the agreement between UDC and the developers to commute the affordable housing requirements.

There is a willing landowner who has entered an option contract with a developer. The contract is sufficiently flexible in that the price payable to the landowner once planning permission is granted is not pre-set and has no minimum value or price/per acre. Subject to agreement being reached on commuting affordable housing requirements, the developer is confident that the development allocated under Policy HN2 will be commercially viable such that it will allow the option to be triggered and enable scheme delivery, to the benefit of the community.

Bury Farm (FEL/HN3)

A key component of the strategy behind the Felsted Neighbourhood Plan, and the proposed allocation of Bury Farm for housing development, is to secure the long term provision of a doctors' surgery facility and health services within the Parish. The construction of the doctors' surgery will come at a significant cost which affects the overall viability of the scheme.

The revenue from the housing development will need to be sufficient to cover all costs including those necessary to meet planning policy requirements, unless commuted for viability reasons. On the basis of viability modelling, the scheme has been shown to be viable subject to the commutation of the affordable housing requirement on the site, which is an ongoing discussion with UDC as part of the planning application process (application reference: UTT/18/2508/OP).

The landowner has committed to gifting the surgery, land and open space to the Parish at nil costs, and there are ongoing discussions with UDC to ensure that this can be delivered through the planning application process.

²² See Felsted Neighbourhood Plan Consultation Statement, Appendix 18-3

The SG has been engaged in discussions with the agents for both sites over a significant period of time and is confident that the proposals outlined in the neighbourhood plan will be delivered.

5. Conclusions

This report has set out in detail the rationale and justification for the housing development proposals contained in the Felsted Neighbourhood Plan. It introduces and explains why the Steering Group has approached the concept of housing allocations within the neighbourhood plan, the reasoning behind the sites being proposed for housing development in the neighbourhood plan and relevant local and national policy considerations.

The report builds on work done by the Steering Group in advance of the Pre-Submission Consultation for the Felsted Neighbourhood Plan on assessing sites and brings together the rationale for the sites and evidence of how the sites will be delivered. It also provides the SG's position on the emerging proposals in the Uttlesford Local Plan and identifies issues of concern and how they will be addressed simultaneously through the local and neighbourhood planning processes.

The Steering Group is confident that the sites proposed will not only contribute to the sustainability of Felsted and meet future housing needs but also deliver very significant community benefits that for the parish as a whole. The SG has not undertaken this rigorous process lightly and recognises that it has a responsibility to address the eventuality of future housing growth in Felsted whilst seeking to secure maximum gains for our residents for long-term.