



## ISSUES AND OPTIONS CONSULTATION



## SUMMARY DOCUMENT

**PLEASE USE THE REPRESENTATION FORMS TO RESPOND TO THE CONSULTATION BY 30 NOVEMBER 2018.**

**THE MEMBER OF THE STEERING GROUP WHO DELIVERED THE QUESTIONNAIRE WILL ARRANGE TO CALL AND COLLECT IT WHEN COMPLETED. PLEASE COMPLETE ONLY ONE QUESTIONNAIRE PER PERSON.**

If you require further copies so that all members of the household can have their say, please contact your Steering Group representative or, alternatively, additional copies can also be downloaded from: <http://www.felmersham.net/ourplan.htm>

**October 2018**

# 1. INTRODUCTION AND BACKGROUND

## Neighbourhood Planning - Introduction

- 1.1 The Government has introduced substantial changes to the planning system in Britain and, as part of these changes, the Localism Act 2011 introduced statutory Neighbourhood Planning in England. It enables communities to draw up a Neighbourhood Plan for their area and it is intended to give communities more say in the development of their local area (within certain limits and parameters). Neighbourhood Plans will, therefore, help in shaping the future of the places where people live and work.
- 1.2 Neighbourhood Plans set out planning policies to help determine planning applications for new development and, as statutory planning documents, these will form part of the Bedford Borough Council "Development Plan". Policies and site allocations identified in Neighbourhood Plans have to be in general conformity with the local authority's Local Plan and take account of the National Planning Policy Framework. Neighbourhood planning, therefore, allows an area to get the right type of development for their community, but the plans must still meet the needs of the wider area. In addition, this means that Neighbourhood Plans must take into account the Council's assessment of housing and other development in the area.

## Neighbourhood Planning - Strategic Context

- 1.3 Neighbourhood Plans do not take effect unless there is a majority of support in a referendum for the Neighbourhood Plan. They also have to meet a number of conditions before they can be put to a community referendum and legally come into force. These conditions are to ensure plans are legally compliant and take account of wider policy considerations (e.g. national policy). The conditions are:
  1. They must have regard to national policies and advice.
  2. They must contribute to the achievement of sustainable development.
  3. They must be in general conformity with strategic policies in the development plan for the local area (i.e. such as in a core strategy);
  4. They must be compatible with European Union obligations and human rights requirements.
- 1.4 An independent examiner will test the Neighbourhood Plan against the basic conditions and ensure the legislative requirements have been met. Following the examination, a report will be issued which will include a recommendation on whether the plan should proceed to referendum. Proposed Neighbourhood Plans need to gain the approval of a majority of voters of the neighbourhood to come into force. If proposals pass the referendum, the local planning authority has a legal duty to bring them into force.

## Neighbourhood Planning - Local Context

- 1.5 In September 2015, Felmersham & Radwell Parish Council applied for the designation of the whole of the Felmersham & Radwell Parish as a Neighbourhood area and, following a period of consultation, Bedford Borough Council endorsed the proposal in a decision statement dated 3 November 2015. A Neighbourhood Plan Steering Group was set up comprising Parish Councillors and interested local residents to take forward the development of the Plan and the Steering Group has been committed to effective community engagement at all stages of the process.
- 1.6 Consultation events have been organised to promote local awareness about the Neighbourhood Plan and to find out what the community thinks about the local area, what is good, what should be changed, what could be improved etc. This community engagement sought to ensure that a Neighbourhood Plan is developed in tune with local needs and aspirations and the feedback has helped shape the content of the latest Issues and Options consultation. Feedback from the consultation undertaken is summarised on the web-site at <http://www.felmersham.net/> and in this document.
- 1.7 This latest consultation sets out the key issues identified so far and possible policy options for addressing them. Before bringing forward detailed policies, proposals and land allocations the Steering Group is now holding a major consultation exercise on the Issues and Options that are summarised in the Representation Forms that have been circulated to each household.
- 1.8 Essentially, this Issues and Options stage of the neighbourhood planning process is a synthesis of current thinking from the feedback and evidence gathered on what sort of development should take place in Felmersham & Radwell over the plan period and what type of development might go where. The Issues and Options stage is not the same as producing a draft Neighbourhood Plan but, rather, it is about sharing current thinking and testing ideas with the wider public and also key partners who may be either statutory consultees, local service providers or landowners/developers with an interest in the future of Felmersham & Radwell.
- 1.9 This is a consultation document, and comments and opinions are invited in the extended consultation period from Monday 22 October 2018 to Friday 30 November 2018 to hopefully maximise response levels. Your views are important:
- PLEASE RESPOND TO THE EMERGING IDEAS AND HELP SHAPE THE PLAN AND FUTURE POLICIES FOR THE PARISH. PLEASE TAKE A FEW MINUTES TO COMPLETE THE QUESTIONNAIRE THAT HAS BEEN DISTRIBUTED TO ALL HOUSEHOLDS AND WILL BE COLLECTED BY STEERING GROUP REPRESENTATIVES.**
- 1.10 A community "drop in" session is also being held on Saturday 27 October 2018 (11.00am - 4.00pm) at the Village Hall, The Old Road, Felmersham. The emerging proposals, including initial views on the preferred locations for small scale growth, will be on display. Steering Group representatives will also be in attendance at this session to provide information and to assist residents that need help and support in completing the Representation Forms. Further copies are also available from the website <http://www.felmersham.net/>.

## 2. COMMUNITY ENGAGEMENT - ISSUES IDENTIFIED

- 2.1 Neighbourhood Plans are intended to be developed by local communities, for local communities and it is, therefore, essential to find out what the community thinks about the local area as a pre-requisite to the production of a successful Neighbourhood Plan. In developing the Neighbourhood Plan, Felmersham & Radwell Parish Council has sought to engage with the local community to ensure that the Neighbourhood Plan is in tune with local needs and aspirations and the feedback has helped shape emerging policies and proposals.
- 2.2 It has been recognised that, without the benefit of local knowledge, key issues may be missed, or even worse, proposals could be developed that are at odds with local needs or priorities, leading to conflict and delay in getting the Neighbourhood Plan adopted. Felmersham & Radwell Parish Council has, therefore, used front-loaded consultation to find out what the local community thinks and identifies as important local issues and opportunities.
- 2.3 A "Launch Event" to promote local awareness about the Neighbourhood Plan was held across two sessions on Friday 22 April 2016 and Saturday 23 April 2016 and the sessions were well attended. This represented the beginning of the neighbourhood planning process and the consultation event was organised with the aim of achieving an event that was open and accessible to all members of the local community. The launch consultation event provided details of what a Neighbourhood Plan is and the stages and timeline to take the initiative forward. Key questions were posed, such as:
- What do we need to retain a viable community in Felmersham & Radwell?
  - How can we make Felmersham & Radwell an even better place to live?
  - What do we value and what do we want to preserve?
  - What is missing in Felmersham & Radwell?
  - What do you think should be changed or improved?
- 2.4 A total of 196 residents attended the launch and the process helped gather a large amount of useful information. Those unable to attend the launch were also given the opportunity to proffer their thoughts and suggestions subsequently by text, e-mail to the Parish Clerk, or in writing. The exhibition material has continued to be available to the local community on an established web-site at <http://www.felmersham.net/>.
- 2.5 Further consultation, via a Neighbourhood Questionnaire, was undertaken during September 2016 to November 2016; this traditional form of questionnaire has enabled statistics to be produced and ideas for options, policies and proposals to be gleaned. There were 265 questionnaires completed either online or as hard copies. 88.8% of respondents identified Felmersham & Radwell Parish as their main residence, whilst 4.4 had a landowner connection and 3.4% had a business connection with the Parish.

2.6 A summary of the key issues arising from the consultation and evidence gathering processes are shown below:

## **THEME 1 - HOUSING**

**Future housing needs, suitable sites, utility infrastructure, drainage, etc.**

### **CORE OBJECTIVE 1 - PLAN THE DEVELOPMENT OF A RANGE OF GOOD QUALITY HOUSING WHICH MEETS THE CURRENT AND IDENTIFIED FUTURE NEEDS OF OUR COMMUNITY**

Key issues identified:

- The type, tenure and cost of new housing should meet the housing needs of the local area, including suitable accommodation for the elderly and local young people keen to live in the village.
- Any new housing should help to broaden the range of stock available in the Parish.
- The need for some good quality affordable housing provision.
- Growth will impact on infrastructure and the environment and, as such, capacity issues must be addressed with careful integrated planning.
- The need to avoid major growth due to the impact on the infrastructure.
- Small scale, low density housing developments are preferred to meet identified need, growth targets and help sustain local services and facilities.
- The need to ensure quality design and building standards for all new development.
- The need to ensure that the village retains its character and rural atmosphere.
- The specific need identified for 2/3 bedroom housing, bungalows and eco-friendly housing.
- The need to respect the Settlement Policy Area, permitting only a minor extension of it to enable fringe development adjacent to existing village boundaries.



## **THEME 2 - OUR INFRASTRUCTURE**

**Physical infrastructure, traffic, parking, pedestrian walking and cycle routes etc.**

**CORE OBJECTIVE 2 - ENCOURAGING SAFE AND SUSTAINABLE MOVEMENT FOR PEDESTRIANS, CYCLISTS, MOTORISTS AND PUBLIC TRANSPORT, AND TO PLAN INFRASTRUCTURE PROVISION (INCLUDING COMMUNICATIONS INFRASTRUCTURE) TO MEET CURRENT AND FUTURE NEEDS**

Key issues identified:

- Complaints about speeding, pedestrian safety and the sufficiency of bus services.
- Parking capacity issues in the village and the scope for reducing on-road parking
- Some support for traffic calming measures, such as road humps or average speed cameras
- Potential scope exists to improve accessibility for cyclists, pedestrians and equestrians throughout Felmersham & Radwell to support healthy communities.
- Scope for an improved network of footpaths and improved maintenance standards.
- The issue of through traffic and the impact of new development on traffic movement.
- Growth will impact on infrastructure such as drainage, sewage, health services, public transport etc

## **THEME 3 - ENVIRONMENT & HERITAGE**

**Agriculture, green spaces, wildlife, footpaths, bridleways, and other natural features, such as small woodlands, in-field trees, hedgerows, ponds and streams, listed buildings etc.**

**CORE OBJECTIVE 3 - PROTECTING AND ENHANCING OUR EXISTING AND FUTURE OPEN SPACES AND SUPPORTING OUR DISTINCTIVE LANDSCAPE WHICH CONTRIBUTES TO A SENSE OF PLACE AND COMMUNITY, INCLUDING NATURAL FEATURES SUCH AS SMALL WOODLANDS, IN-FIELD TREES, HEDGEROWS, PONDS AND STREAMS WHICH DISTINGUISH THE PARISH. PROTECTING AND ENHANCING OUR LISTED BUILDINGS.**

Key issues identified:

- The need to protect existing green space in the village.
- Open spaces of amenity, ecological or recreational value within the built up area should be retained.
- The need for improvements to the landscaping of public areas.
- The need to protect trees, hedgerows, and other distinctive features in the village.
- The potential for a tree planting scheme.
- The need to protect natural resources.
- The need to protect the distinctive views and visual connectivity with the surrounding countryside.
- Scope for an improved network of footpaths and bridleways, including a series of Parish Walks.
- The need to ensure that both the fabric and the setting of listed buildings and heritage assets continue to be protected.

## **THEME 4 - OUR COMMUNITY**

**Village services, community facilities, amenities for children and young people, village pub, playing field, broadband connectivity etc.**

**CORE OBJECTIVE 4 - ENSURING THAT THE VILLAGE BENEFITS FROM SUFFICIENT FACILITIES, AMENITIES AND SERVICES FOR ALL MEMBERS OF THE COMMUNITY**

Key issues identified:

- The need to protect existing community facilities that are all highly valued.
- There was recognition that existing facilities were good but that scope exists to secure improvements that would benefit the Village, some of which may be justified from small scale development.
- Mobile phone coverage and improved broadband regularly featured as being important.
- There is scope to improve local services (local bus service, medical provision, community shop etc) but commercial factors will influence provision in the rural area.
- Pinchmill Primary School offers excellent provision for the children in the villages and there is a need to maximise the potential of the School as a contributor to economic success.
- Village identity and community spirit are regarded as important factors for local people.

## **THEME 5 - BUSINESS & EMPLOYMENT**

**Issues for local employers, those working from home, self employed, etc.**

**CORE OBJECTIVE 5 - IDENTIFYING DEVELOPMENT OPPORTUNITIES TO PROVIDE FURTHER EMPLOYMENT GROWTH WITHIN THE VILLAGE WHILST SAFEGUARDING EXISTING BUSINESSES FOR THE BENEFIT OF THE COMMUNITY**

Key issues identified:

- Future employment growth in the village will be limited and must be of a scale that will have limited adverse impact on existing services and infrastructure.
- Growth will impact on already constrained infrastructure and, as such, capacity issues must be addressed with careful integrated planning.
- Some scope for the provision of small affordable units for new business use, possibly relating to tourism and leisure, office based businesses, agricultural and service trades.
- Support for retail capacity and medical services if such provision can be encouraged to locate in the village.
- Scope to improve mobile phone coverage across Felmersham & Radwell.

- 2.7 It is essential that the special characteristics of the Parish are protected and enhanced and, in recognition of this, the following Vision Statement has been proposed for the emerging Neighbourhood Plan:

**"To value, protect and promote the unique parish of Felmersham & Radwell, by respecting its heritage, appreciating its current community and being aspirational when planning its future".**

- 2.8 The responses to the consultation exercises have been used to help review and shape the draft vision and overarching objectives, together with the content of the Issues and Options consultation document. It has provided a good level of data which has been invaluable in establishing priorities, identifying problems and generating ideas.

**ISSUES AND OPTIONS IN RELATION TO THE FOLLOWING KEY OBJECTIVES ARE NOW SUBJECT TO CONSULTATION AND HOUSEHOLDS ARE INVITED TO COMPLETE THE REPRESENTATION FORMS CIRCULATED SEPARATELY WITH THIS DOCUMENT:**

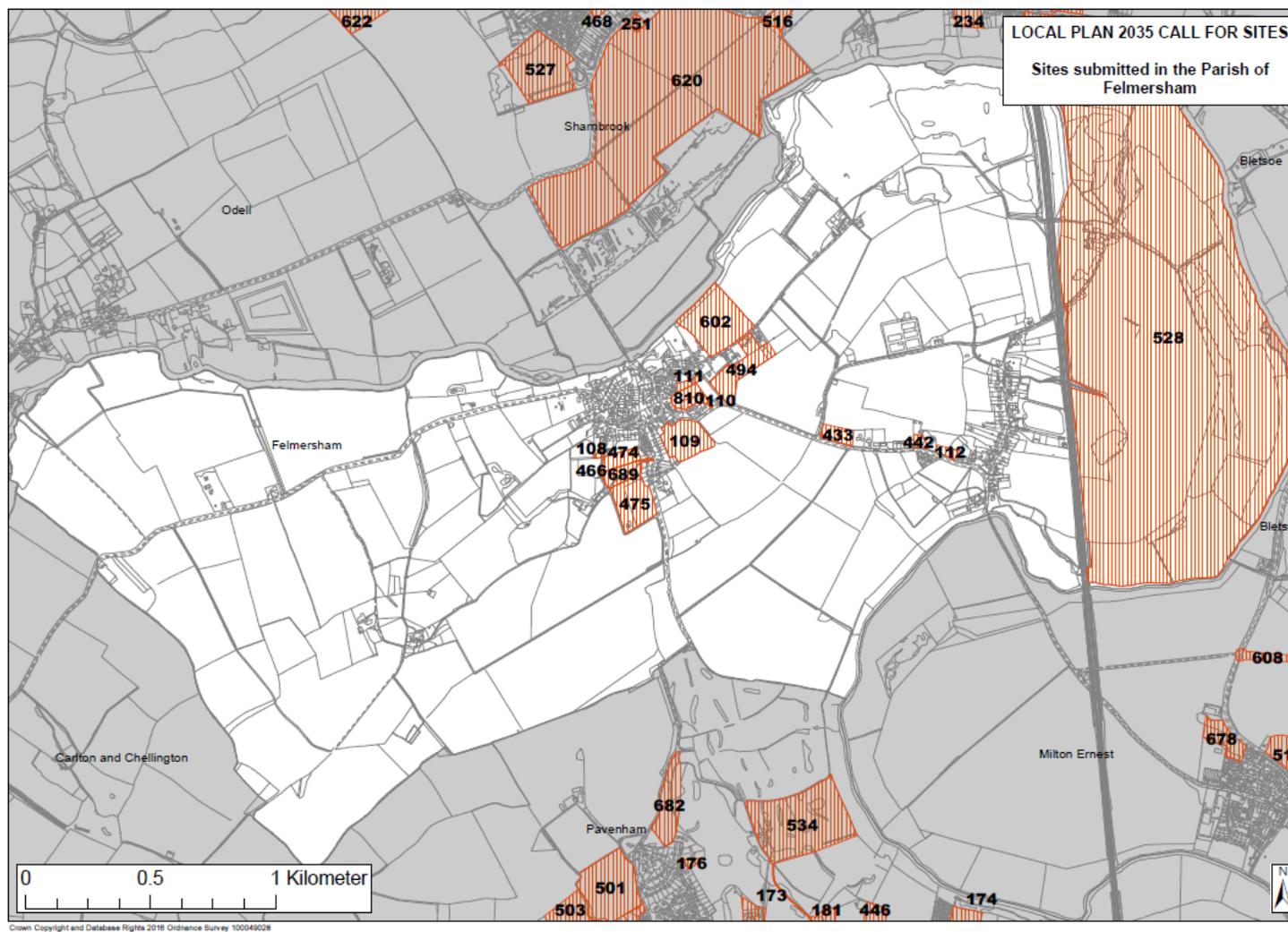


### 3. HOUSING GROWTH - POTENTIAL SITES SUBMITTED

- 3.1 Bedford Borough Council has commenced the preparation of a new Local Plan that will set out how much growth there should be in the Borough in coming years (housing, jobs and associated infrastructure) and where it should take place. Current planning policy documents look ahead to 2021 and it is currently proposed that the emerging Local Plan will extend the period that development is been planned for to 2035. It will also contain policies that will be used to make decisions on planning applications.
- 3.2 There have been several consultations that have sought responses to the main issues facing the Borough in the coming years. For example, how much growth should be planned for and in general terms where it should be located. As part of this process, the Borough Council invited details of possible development sites, known as a 'call for sites' and, in response to this, a number of sites in Felmersham & Radwell were submitted for consideration. Not all the land that is submitted via this process is suitable for development and a technical assessment of each site has, therefore, been required.
- 3.3 The emerging Local Plan makes provision to satisfy the Borough's growth requirements based upon an objectively assessed local need (approximately 8,000 new homes in the period to 2035). The broad approach to site allocations in the Local Plan has continued to focus growth in the urban area, suitable edge of urban sites and the larger villages where community facilities are available or can be provided or improved. The most recent development strategy also incorporated growth in a new garden village at Colworth, near Sharnbrook in North Bedfordshire but, as a consequence of deliverability issues, this proposal had to be been reconsidered and the Borough Council confirmed that the plan, as it stands, is not ready to be examined. Additional work has, therefore, taken place on the evidence base to support an amended plan and a further period of consultation is now taking place and has invited representations on a changed local plan covering the reduced period to 2030 before it is submitted to the Secretary of State for examination.
- 3.4 The Borough Council has recognised that the strategy in currently adopted plans focuses development on the Bedford, Kempston and northern Marston Vale growth area where over 90% of the borough's planned growth between 2001 and 2021 is located. This includes strategic scale development in Wootton, Stewartby, Shortstown and Wixams with significant areas still to build-out. For this reason, and to allow new communities to mature and integrate, the preferred development strategy to date has not proposed any new development allocations to meet Borough wide housing needs in these areas (with the exception of the brownfield site at Stewartby Brickworks). The preferred development strategy does not rely on allocations in smaller villages (like Felmersham & Radwell) to deliver homes to meet the borough-wide requirement. However, under the preferred development strategy, communities in these locations would be able to bring forward development through their own Neighbourhood Plans should they wish to do so. There is a prospect that the overall growth requirement could increase as the change to national planning policy will require local authorities to calculate housing need using a new formula (which would result in a significant increase in assessed housing need in the Borough by over 6,000 new homes over the 20 year plan period) and thus the final development strategy in terms of allocations across the Borough could change. Felmersham & Radwell also has to consider its longer term aspiration and plan for its secure future.

3.5 The location of sites in Felmersham & Radwell that have been submitted to Bedford Borough Council for potential housing development is shown on the map below and Section 4 of this summary document provides an assessment of these proposed sites.

### MAP - SITES SUBMITTED IN RESPONSE TO CALL FOR SITES PROCESS



## 4. HOUSING GROWTH - ASSESSMENT OF SITES

### Background

- 4.1 A key purpose of this consultation is to allow the community to comment on the acceptability of the sites put forward as potential allocations for future development in Felmersham & Radwell. The consultation forms part of the Felmersham & Radwell Neighbourhood Development Plan and will inform the means by which any sites allocated in the Neighbourhood Plan have been selected.
- 4.2 Each of the sites that form part of the consultation have been independently assessed in a consistent manner by Woods Hardwick Planning Limited as appointed planning advisors so as to be sure that sustainable development, as defined in the National Planning Policy Framework (NPPF), will be achieved within the Parish of Felmersham & Radwell. This is an important process in neighbourhood planning as any policies contained within the final Plan will need to be in conformity with the NPPF and in general conformity with the Bedford Borough Council Local Plan 2002 (BBCLP) and the emerging Local Plan 2035.
- 4.3 It is also important to consider the outcome of the housing needs survey for Felmersham & Radwell, undertaken by Bedfordshire Rural Communities Charity, so that the future needs of the community are met and to broadly comply with the Borough's strategic approach to housing need. This identified a need for 5 units of affordable rented and shared ownership housing for local people in, or with strong links to, the Parish and 14 units of market housing for people looking for a property to purchase on the open market at some point over the next 20 years. Based upon the feedback received, and the level of support that exists for some small scale developments in the village to meet local need, the emerging Neighbourhood Plan targets the delivery of 19 new homes in the village in the period to 2035. It is envisaged that this level of growth should be acceptable if the right type of housing is proposed.
- 4.4 The emerging Neighbourhood Plan also recognises that all new housing should help to broaden the range of stock available in the Parish. It should complement and add to the existing stock, broaden choice and extend the opportunity to own a house or live in the village to a wide range of people. The type, tenure and cost of new housing should meet the needs of the local area and, arising from the consultation feedback received, there will be a presumption in favour of a particular need for 2-3 bedroom market houses and bungalows to meet the identified current and future needs of existing owner occupiers wishing to stay in the village. The provision of flats/apartments and three storey housing as part of new developments was not well supported and it is proposed, therefore, that such accommodation types will only be acceptable if there is a definite need for such provision in the Parish.
- 4.5 It should be noted if a site is allocated for future development within the Felmersham & Radwell Neighbourhood Development Plan, it will still need to go through the normal planning application process and the final decision on any planning application rests with the Local Planning Authority, however, if a site is allocated in a "made" Neighbourhood Plan, the principle of the land being developed for the allocated use will be considered acceptable.

### Location of Growth

- 4.6 For the Parish of Felmersham & Radwell a number of potential development sites have already been submitted to Bedford Borough Council as part of their "call for sites" exercises undertaken in conjunction with the preparation the new Local Plan to 2035 (identified in the map above by their call for sites reference number). Details of the submitted sites have been subject to initial consultation with residents during the early stages of the neighbourhood plan preparation. The comments made by residents have been taken into account and have helped to inform work on developing this issues and options consultation.
- 4.7 The community has expressed a reasonable level of support for the provision of some further new housing to support local need and to help sustain and improve local services and facilities, but concerns have been expressed at the existing infrastructure constraints and traffic and congestion issues. A key overriding consideration is the need to ensure that the village retains its character and rural nature and a key objective in the Neighbourhood Plan will be to meet new housing demand in a way that ensures that the right type of housing is built in the right locations, and that protects the village from uncontrolled, large scale, or poorly placed, development.
- 4.8 The majority of residents responding to the neighbourhood questionnaire indicated a preference for small scale, low density development with most respondents choosing an option of growth levels of either (i) up to 20 new homes, or (ii) 21 to 40 new homes. The weighted average response was for 23 new homes, and the most frequent response was for up to 20 new homes. Respondents expressed a good level of level for maintaining the existing Settlement Policy Area (SPA) - 55% of respondents - with some support for extending the SPA to enable fringe development - 57% of respondents. There was much resistance to significantly extending the existing SPA for development or to enable small developments in the surrounding open countryside.
- 4.9 In terms of location, feedback from the consultations undertaken to date has provided some valuable data in relation to potential development sites from a community perspective. A crude analysis of responses indicated that:
- There was a reasonable level of support for the small scale provision of housing on land at Thursdays Farm, Radwell (sites numbered 112 and 442, with net positive support of 39.7% and 29.4% respectively) and land at Old Road, Felmersham (Site 602 with net positive support of 24.5%);
  - There was also net positive support for 6 dwellings on land at Town Lot Lane, Felmersham (Site 108), and marginally net positive support for 6 dwellings on land at Memorial Lane, Felmersham (Site 111) and 13 dwellings on land at Thursdays Farm, Radwell (Site 433);
  - There was strong resistance to the proposals to build on land accessed from Pavenham Road, namely (i) 25 dwellings on land at Town Lot Lane, Felmersham (Site 466), 20 dwellings on land South West of Pavenham Road (Site 474/689), and 50 dwellings on land at The Leys, Pavenham Road, Felmersham (Site 475);
  - There was also net disapproval ratings for the proposed development of (i) 25-30 dwellings on land at Radwell Road, Felmersham (Site 109), 10 dwellings on land at Harrowdene Farm (Site 110) and 20-30 dwellings on land at Old Road, Felmersham (Site 494).

[Note: Site 810, Land at Harrowdene Farm, Felmersham, and Land at Perch Heights, Carlton Road, Felmersham has been submitted since the original consultation and do not, therefore, feature in the above summary].

## Assessment Methodology

- 4.10 A key purpose of the consultations that have been undertaken to date has been to obtain views on the acceptability of the sites put forward as potential allocations for future housing in the Parish. Planning legislation also requires a site assessment methodology to balance sustainability and deliverability objectives in a way which ensures that the Neighbourhood Plan intentions are met whilst achieving Sustainable Development which is defined in paragraphs 18-19 of the National Planning Policy Framework (NPPF). Each site has, therefore, been assessed against its suitability, availability and achievability (as required by paragraph 47 of the NPPF). This is in addition to the assessment of acceptability, from a community perspective, which is a separate requirement of Neighbourhood Planning.
- 4.11 This detailed site assessment covers a four stage process to establish which sites best fit the plan objectives and provides the basis for making a decision about which sites should be allocated. The four stages are as follows:
- Identifying the sites which are in locations identified as being suitable for development. At this stage sites which have overriding physical or environmental constraints will be filtered out.
  - Assessing the availability of each potential site.
  - Assessing the deliverability of each site including viability.
  - The acceptability of each site as an allocation within the Neighbourhood Plan will be assessed based upon the outcome of this consultation.
- 4.12 All of the sites were assessed based upon the following key areas:
- Location; is it in a suitable location for development and would it contribute to the creation of sustainable, and mixed communities;
  - Policy restrictions; e.g. existing designations, protected areas, existing planning or other policy or strategy;
  - Physical problems or limitations; e.g. access, flooding infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
  - Potential impacts – including effect upon landscape features, heritage assets and conservation;
  - Environmental conditions which would be experienced by prospective residents.
- 4.13 In considering potential land allocations, regard will need to be given to the assessment of sites in terms of suitability, availability and achievability and also to the feedback from the community in terms of sites offered for development and the commitment to locate a planned level of growth focussed at the centre of the village, close to local amenities.
- 4.14 There is definite interest from landowners in developing land in Felmersham & Radwell but, based upon the evidence collected, many sites are unacceptable. Sites 109, 110, 112, 433, 442, 475 and 810 are not recommended as being suitable for development:
- **Site 109: Land at Radwell Road, Felmersham** (2.36 hectares), proposed for 25 to 30 dwellings is not considered suitable for development because the site is located outside of the Settlement Policy Area (SPA) boundary and is allocated as Village Open Space in the Allocations and Designations Local Plan. Borough Council Policy AD40 states that development will not be permitted on land designated as village open space unless the reasons for designation are not compromised or other material considerations outweigh the need to retain the space. The site is considered unsuitable for allocation as it would conflict with Policy AD40.

- **Site 110: Land at Harrowdene Farm, Felmersham** (0.3 hectares), proposed for 10 dwellings. The site is similarly located outside of the SPA boundary and is allocated as Village Open Space in the Allocations and Designations Local Plan. Policy AD40 states development will not be permitted on land designated as village open space unless the reasons for designation are not compromised or other material considerations outweigh the need to retain the space. The site is considered unsuitable for allocation as it would conflict with Policy AD40 and, therefore, no further assessments have been made.
- **Site 112: Land at Thursdays Farm, Radwell** (0.25 hectares), proposed for 5 dwellings is not considered suitable for development because it is outside of the located outside of the SPA boundary and separated from Felmersham, the village with the main amenities. Whilst the site is adjacent to existing dwellings and would not appear isolated, it is not in a sustainable location in terms of access to existing amenities; given the location of the site, development would conflict with Local Policy which seeks to ensure new dwellings are in a sustainable location. The site is not, therefore, considered suitable for allocation in the Neighbourhood Plan. Other factors may affect the viability of the site, notably (i) the site is within an area of archaeological interest and archaeological works may be required, and (ii) the provision of footways would be required for an extensive length along Felmersham/Radwell Road in order to link towards the centre of the village.
- **Site 433: Land at Thursdays Farm, Radwell** (0.75 hectares), proposed for 13 dwellings is not considered suitable for development because the site lies outside of the SPA boundary and separated from Felmersham, the village with the main amenities. Given the location of the site, development would conflict with Local Policy which seeks to ensure new dwellings are in a sustainable location and, therefore, it would not be appropriate for allocation in the Neighbourhood Plan at this time as other sites have been submitted which are considered more suitable. It is also inevitable that the provision of footways would be required for an extensive length along Felmersham/Radwell Road in order to link towards the centre of the village; this may affect the viability of the site
- **Site 442: Land at Thursdays Farm, Radwell** (0.3 hectares), proposed for 5 dwellings is not considered suitable for development because the site lies outside of the SPA boundary and separated from Felmersham, the village with the main amenities. As outlined above with sites referenced as 112 and 433, the site is considered unsuitable for allocation in the Neighbourhood Plan due to its location and, therefore, no further assessments have been made. The site assessment report has further identified that the site is within an area of archaeological interest and, therefore, archaeological works may be required which could affect viability.
- **Site 475: The Leys, Pavenham Road, Felmersham** (2.63 hectares), proposed for 50 dwellings is not considered suitable for development because the site is separated from the main part of the village by other sites put forward and, unless all of these sites are allocated, this site would be quite isolated from the existing built form. Collectively the sites would be of a significant scale and have the potential to have an overbearing impact on the village. This site is not considered appropriate for allocation in the Neighbourhood Plan at this time as other sites have been put forward which are more suitable.
- **Site 810: Land at Harrowdene Farm, Felmersham** (0.6 hectares), proposed for 20 dwellings. The site is similarly located outside of the SPA boundary and is allocated as Village Open Space in the Allocations and Designations Local Plan (see also Site 110 above). The site is considered unsuitable for allocation as it would conflict with Policy AD40. In addition, Harrowdene Farmhouse, to the south of the site, is a grade II listed building. The development site is, therefore, within the setting of the listed building and potential curtilage listed buildings and any development would need to take into account the need to conserve and enhance the setting of the historic environment. The site slopes uphill to the south, properties in High Road (south east of the site) sit on higher ground than those to the north.

4.15 The site assessments have also identified a potential issue or issues with the following sites that will need to be addressed and overcome to enable development. These issues relate primarily to physical problems or limitations (e.g. access and infrastructure) and the potential effect upon designated landscape features but, subject to further assessment of transport and highway issues and landscape mitigation measures, these sites may be considered suitable for allocation in the Neighbourhood Plan:

- **Site 108: Land at Town Lot Lane, Felmersham** (0.14 hectares), proposed for 6 dwellings;
- **Site 466: Land at Town Lot Lane, Felmersham accessed of Pavenham Road** (0.833 hectares), proposed for 25 dwellings;
- **Site 474/689: Land South West of Pavenham Road, Felmersham** (1.01 hectares), proposed for 20 dwellings;
- **Site 494: Land at The Old Road, Felmersham** (2.5 hectares), proposed for 20-30 dwellings.

As indicated at 4.9 above, however, the previous neighbourhood consultation identified strong resistance to the proposals to build on land accessed from Pavenham Road, namely (i) 25 dwellings on land at Town Lot Lane, Felmersham (Site 466) and 20 dwellings on land South West of Pavenham Road (Site 474/689), and there was also a net disapproval rating for the proposed development of 25-30 dwellings on land at Old Road, Felmersham (Site 494). It is unlikely, therefore, that these sites would be acceptable to the community.

4.16 The evidence collected identifies that, subject to determining an appropriate scale of development, there are three sites in Felmersham that could be allocated for housing development. These are Site 111: Land at Memorial Lane, Site 602: Land at The Old Road and Land at Perch Heights, Carlton Road. The evidence collected from the community to date confirms, in any event, the acceptability of only small scale development on a few sites and, in addition, a strong preference for low density development. The original proposal for the land at Memorial Lane (Site 111) identified the site for the provision of older people housing; this is consistent with a good level of local community support for new housing in the village that enables older people to move into more suitable accommodation for their needs.

4.17 The evidence collected also identified net positive support for development on land at Old Road, Felmersham (Site 602); it is a large site comprising 4.1 hectares within walking distance of the village amenities. The original proposal is based upon the provision of 3 detached family houses on large plots, together with the provision of a car park for use by the School, the Church and the Village Hall. The site plan, forming part of the submission, also identifies a play area, tennis court, football pitch and cricket square, together with a pedestrian crossing from the proposed car park to the School, thus offering improved access to the expanding Pinchmill Lower School which has insufficient car parking. The evidence collected during the neighbourhood planning process, however, identified a particular need for smaller accommodation, including 2-3 bedroom houses and bungalows. It is considered that the site has the potential to deliver a modest increase in the proposed capacity and could target 6 new dwellings to contribute to local need in a well designed setting.

4.18 The Site Assessment Report has also identified potential constraints to the full allocation of 14 dwellings that is proposed at Perch Heights, Carlton Road, Felmersham, although it is considered that the scope for a more reasonable scale of development in this location exists. This reduced scale would allow the existing screening of mature trees and hedgerows to be retained to mitigate the impact on the countryside and the revised scale would appropriately reflect the low density of the village edge.

4.19 If the proposed scale of development in the Local Plan period of 19 new homes is supported, it is considered that the Neighbourhood Plan could allocate land as follows:

Site Location	Total Number of Units
Site 111: Land at Memorial Lane, Felmersham	6
Site 602: Land at The Old Road, Felmersham	6
Land at Perch Heights, Carlton Road, Felmersham	7
<b>TOTAL</b>	<b>19</b>

4.20 Alternative distribution patterns to meet growth targets across these 3 sites are available and, if there is an overwhelming community preference, one or more of the above sites could be disregarded, or other sites reconsidered if identified issues can be resolved. It is considered, however, that it would be appropriate to recognise the community preference for several small scale developments and, as such, the emerging view is that no more than 10 new homes should be added to a preferred site. This latest consultation, therefore, invites the community to indicate whether an alternative distribution of growth is preferred within these overall guiding principles.

4.21 There will inevitably be risks associated with bringing the preferred sites forward for development - such as the inability to demonstrate that suitable highway access can be provided to the site, or landowner expectations in the Local Plan period. To protect against non-delivery of the quantum of housing required, an option would be to also allocate a further Reserve Site although the issues and constraints outlined may preclude this option. The allocation shortage from the failure of one site to deliver housing could, alternatively, be achieved by (i) allocating further homes to one of the preferred sites or (ii) by distributing the allocation of houses over all of the other preferred locations for growth if this can be accommodated.

