

## Responses to SWNP Reg 14 consultation

This document sets out the responses we received to the SWNP Reg 14 consultation.

They are set out per policy and per respondent.

Where there is no colour, this means that the policy was supported and / or the policy was not supported but no changes were suggested.

Where there is **green**, an amendment was made.

The comments are **numbered** to make it easier to discuss them.

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## General comments

### GC1

<b>Contact Details</b>	Everyone
<b>Organisation</b>	
<b>Comment</b>	
End date of plan on cover sheet is wrong	
<b>Action Proposed</b>	
Correct this typographical error	<input checked="" type="checkbox"/>

### GC2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Chelmsford District Council
<b>Comment</b>	
At 11.1.3 the numbering of the NPPF Paragraphs appears to be inaccurate.	
<b>Action Proposed</b>	
Check and correct any typographical error	<input checked="" type="checkbox"/>

### GC3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	King Edward VI & The Revd Joseph Prime Almshouse Charity
<b>Comment</b>	
<p>This response to the draft Saffron Walden Neighbourhood Plan is made by the King Edward VI Alms Houses Saffron Walden (KEVI).</p> <p>The King Edward VI Almshouse Charity offers homes for local people of modest means and on a low income and has existed in Saffron Walden for this purpose since the year 1400.</p> <p>Housing is provided for those who are on a low income, with limited savings, and resident in the former borough of Saffron Walden or its immediately adjacent villages, or have clearly demonstrable very strong connections with Saffron Walden.</p> <p>Unlike many Almshouses KEVI do not have a lower age limit. We consider all ages and, currently, our residents range in age from 30s to 80s, the average age being 47. We also consider small families for our two-bedroom units, and currently have three children among our residents. KEVI therefore have a clear objective to meet specific local housing needs in Saffron Walden.</p>	

To help secure the future legacy and ensure a sustainable future, the Trustees are looking to progress the replacement and redevelopment of seven of the bungalows in Prime's Close, on the Abbey Lane site. The bungalows are beset with long-standing problems and reaching the end of their useful life. They were built in 1950, just after the War, replacing dwellings built in 1782 which, in turn, had replaced earlier tenements built in 1400.

The representations and suggestions in the table below are made within this context and seek support and further clarity within the final version of the Saffron Walden Neighbourhood Plan to help secure the future of this important community asset.

**Action Proposed**

Consider responses to individual policies in the light of this introductory text.

**GC4**

**Contact Details**

[REDACTED]

**Organisation**

Uttlesford District Council

**Comment**

**History and Character of Saffron Walden**

Page 5; Paragraph 2.1 – First sentence - Please provide a link to the Heritage and Character Assessment Report by AECOM as well as date of study. .

**Action Proposed**

Add link

**GC5**

**Contact Details**

[REDACTED]

**Organisation**

Uttlesford District Council

**Comment**

Page 5: Paragraph 2.3 Last Sentence – Saffron Walden has a very rich heritage and an indication that there are approximately 320 listed buildings/groups identified on the National Heritage List for England list will give an indication of concentration of the uniqueness of Saffron Walden.

**Action Proposed**

Review paragraph

**GC6**

**Contact Details**

[REDACTED]

**Organisation**

Uttlesford District Council

**Comment**

Page 6: Paragraph 2.12 Second Sentence – Please provide year and a link to the Assessment/s. Is the Halifax Report part of the evidence base? Please provide year and link.

**Action Proposed**

Add link

#### GC7

**Contact Details**

**Organisation**

Uttlesford District Council

**Comment**

Page 6: Paragraph 2.13 “The busiest junctions are at capacity etc.....” Please provide a source

**Action Proposed**

Add source

#### GC8

**Contact Details**

**Organisation**

**Comment**

Overall, the Saffron Walden Neighbourhood Plan 2020- 3035 looks a well-written, well-researched, well-structured, detailed document.

It reflects the fact that lessons have been learnt from previous planning decisions.

However, as a plan for the future - that will resolve some of the outstanding issues - I feel it is somewhat weak.

Observations are:

1. **Cover Page** – mistake – says Plan is 2020 – 3035.
2. **Shire Hill Industrial Estate** I saw no mention of the dire traffic movement and traffic parking situation on the Shire Hill Industrial Estate. Also, consequentially, there was no mention of any plan or initiative to remedy this situation. As this is one of the prime industrial areas in the town, it is surely important to get this right? There appears to be no plan to solve what has become over recent years an out-of-control situation,
3. **Health** The statements were quite bland and (I felt) understated regarding the under-capacity of health support. While the time to obtain a doctor’s appointment is excessive, this is not the end of the matter. The time to achieve subsequent and consequential treatment, consultations, etc, often stretches into weeks and months and can depend on one being very proactive. While some of the difficulties are a result of problems in the wider health system, many of them are not – and are local issues. It is

not enough to say “doctor’s surgeries are at capacity”. (Page 15) It is much worse than this.

4. **Relationship Between Building and Traffic** In the Plan, there did not seem to be any kind of acknowledgement that there is within the town a very close correlation between the amount of building and the levels of traffic congestion and pollution. It was almost as if these two issues were independent of one another. It is contended that the traffic problems are a direct consequence of the over-building that has been allowed to happen. Perhaps this point should be emphasised?

5. **Failure to Record Some Direct Influencers on the Town** While the hierarchy of development plans is well appreciated, it also must be appreciated that the workings of the town are an open system: not a closed system. Local building, most particularly in villages to the east of Saffron Walden (for example in a village like my own, at Swards End), have a direct affect on traffic issues in the town. Within the Neighbourhood Plan, I cannot see any mention of a causal link between the large amount of extra building that has been allowed in Swards End and other villages in the east, and the consequential, extra and significant traffic produced, which inevitably (for the reasons well explained in the Plan) has to in from the east and drive through the town, and then return from the west. While the Neighbourhood Plan for Saffron Walden should be what it says it is, surely, a relationships like this – as being part of a wider system – should be covered with the text? Without such statements, I suggest, there is nowhere to describe and put on record these sorts of relationships, which will lead to planning errors in the future?

6. **State of Roads** While the state of the roads is an Essex Highways, Essex County Council, responsibility, surely mention should be made of the appalling state of the towns potholed roads and the liaisons with other authorities that will need to take place to remedy these issues?

Overall, the Neighbourhood Plan – while well written and well presented - gives an impression of a rather lacklustre, less-than-positive approach to dealing with some of the major issues within the town and its immediate environment. While it does record some of the major issues, the unsatisfactory decisions, the dire traffic conditions, the narrowness of the roads, the lack of east-west transit capability, the over-building, the lack of infrastructure, the poor state of the roads, etc, it says little or nothing about how these issues are to be resolved in future. In essence, therefore, while it is labelled as a plan, it is poor plan. A plan should, after all, be a projection of effective actions to be taken in future? I feel that this Neighbourhood Plan does not meet this criterion. As a document (despite its gloss) it is essentially a poor document in terms of detailing effective future actions, and does not inspire confidence that it is a plan for the right things to happen in the future.

Action Proposed	
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Note that roads, health etc are the responsibility of other authorities but that we will continue to request improvements to meet the needs of the town, and that these needs should be reflected in any new developments	<input checked="" type="checkbox"/>
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### GC9

<b>Contact Details</b>	National Grid (Avison Young - UK) <nationalgrid.uk@avisonyoung.com>
<b>Organisation</b>	National Grid
<b>Comment</b>	No Assets Standard Response – received. No comments on policy
<b>Action Proposed</b>	
No action	

### GC10

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Historic England
<b>Comment</b>	We welcome the production of this neighbourhood plan, but do not currently have capacity to provide detailed comments. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your plan, which can be found here: < <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a> >.
<b>Action Proposed</b>	
None	

### GC11

<b>Contact Details</b>	SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
<b>Organisation</b>	Natural England
<b>Comment</b>	Natural England does not have any specific comments on this regulation 14 neighbourhood plan
<b>Action Proposed</b>	
None	

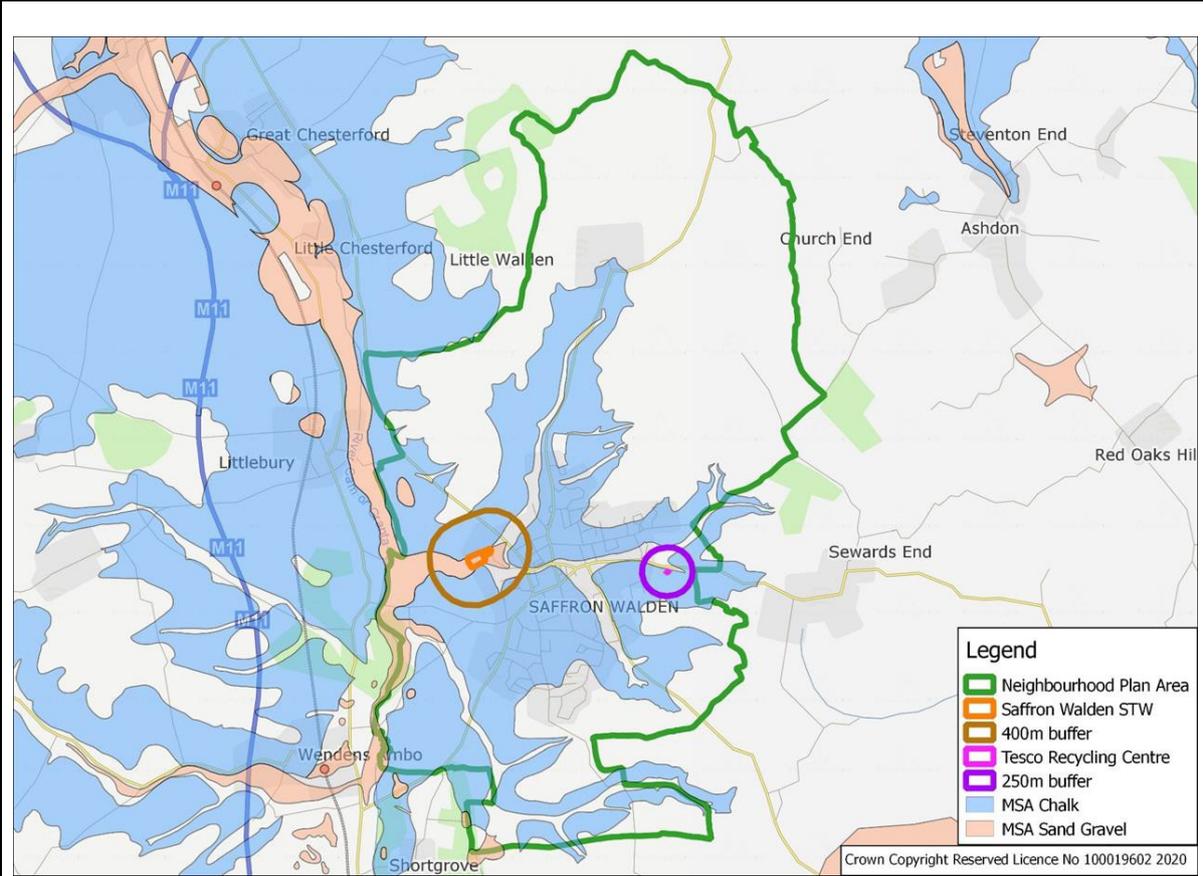
### GC12

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
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<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>Development Plan Hierarchy</u> – The hierarchy of development plans documents as set out in the Plan does not accurately reflect the Development Plan within Uttlesford District. The Development Plan also comprises of the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP).</p> <p>ECC wishes to draw your attention towards Policy S8 of the MLP and Policy 2 of the WLP, as they have strategic relevance. These policies safeguard locations which potentially contain mineral resources and outline existing and allocated minerals and waste infrastructure, to ensure future minerals and/or waste infrastructure may operate. The respective policies ensure that the MWPA are consulted on all applications on Mineral Safeguarding Areas (MSAs) and those within 250m or 400m of existing or allocated minerals and waste infrastructure.</p> <p>ECC recommends Policy S8 of the MLP and Policy 2 of the WLP be added to Appendix 1 of the Plan, which acts to provide a schedule of those policies considered to be strategic.</p>	
<b>Action Proposed</b>	
Add these policies as suggested. <input checked="" type="checkbox"/>	

### GC13

<b>Contact Details</b>	
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>ECC as the Minerals and Waste Planning Authority (MWPA) has the following observations and comments to assist in the next iteration of the Plan.</p> <p><u>Minerals Planning Matters</u> – The NPPF ensures the safeguarding of mineral resources of national and local importance be carried out by the MWPA through the designation of MSAs. MSAs aim to ensure mineral resources are adequately and effectively considered in land use planning decisions to prevent sterilisation by non-mineral development. The MSA designation signifies the potential presence of economically viable mineral resources. This ensures that the presence of minerals is considered at the earliest opportunity in the plan/development process.</p> <p>Policy S8 of the MLP identifies MSAs around economically viable mineral deposits in the County. Policy S8 is part of the Development Plan for the Neighbourhood Plan area and therefore all planning decisions must be taken in accordance with it.</p> <p><u>Map 1 – Mineral Safeguarding Areas in relation to Saffron Walden Neighbourhood Plan Area</u></p>	



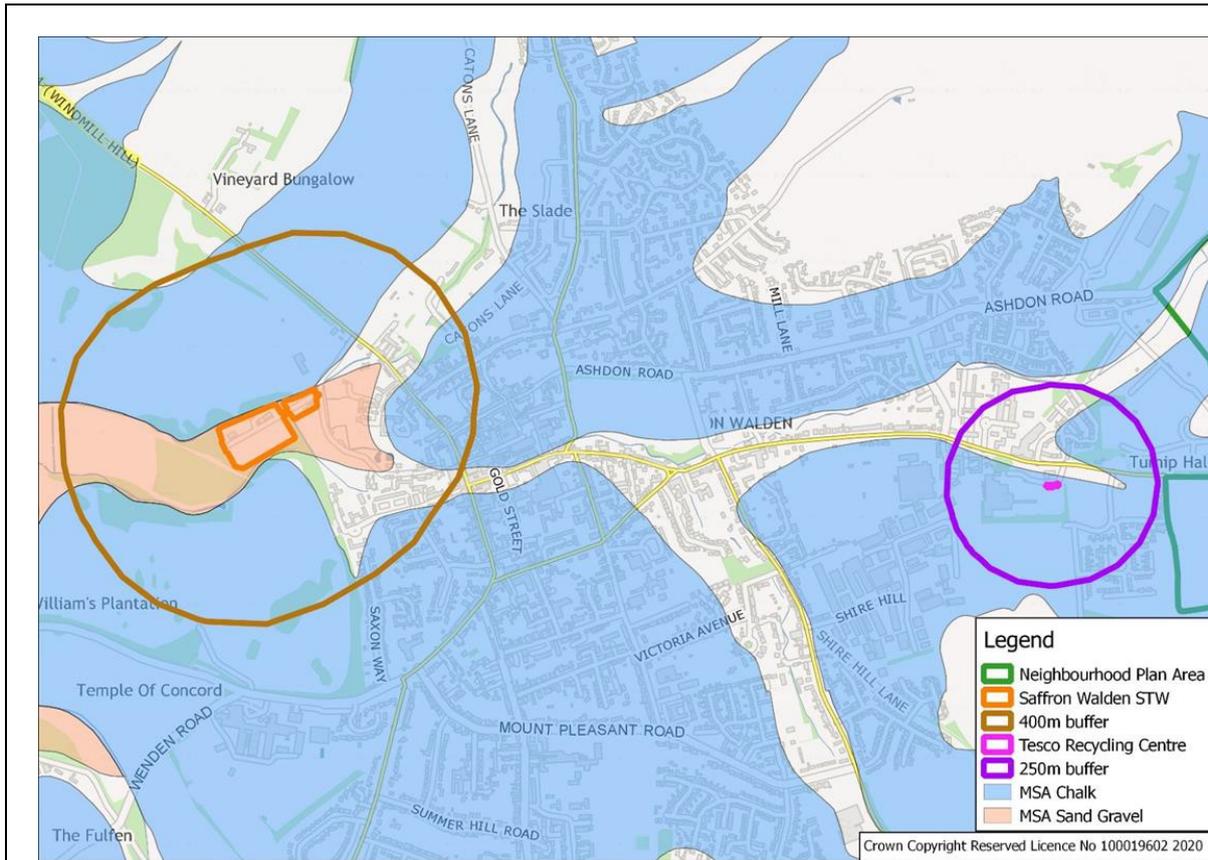
Map 1 shows that the Neighbourhood Plan area contains a significant amount of chalk deposits. Whilst chalk is not currently extracted in significant quantities in Essex, the NPPF still requires chalk to be safeguarded. Map 1 shows that there is mineral bearing land to the west, which is designated as a sand and gravel MSA. ECC as the MWPA must be consulted on any planning application on a site located within a Sand and Gravel MSA that is 5ha or greater, or in the case of a Chalk MSA, greater than 3ha.

**Action Proposed**

This comment is resolved by the proposed action above.

**GC14**

<b>Contact Details</b>	
<b>Organisation</b>	
<b>Comment</b>	
<p><u>Waste Infrastructure Planning Issues</u> - Map 2 shows the waste developments within the Neighbourhood Plan area.</p> <p><u>Map 2 – Waste Developments within the Neighbourhood Plan Area –</u></p>	



**List of Waste Facilities**

- Saffron Walden Sewage Treatment Works – no ECC planning app.
- Tesco, Saffron Walden – ESS/34/09/UTT - Replacement of existing recycling facilities with new tomra automated recycling centre

To ensure consistency with the existing safeguarding policy (WLP Policy 2), a 250m buffer (rising to 400m in the case of the sewage works) are designated around waste developments, which is the zone within which the MWPA would be a consultee for any proposed development which is not minerals or waste related. The buffer zone allows the MWPA to consider whether the proposed non-mineral and/or waste development may compromise the operation of the existing development. Further details regarding these policies can be found in the WLP.

Note there is currently no mineral related development in the Saffron Walden Neighbourhood Plan Area.

**Action Proposed**

No action required.

**GC15**

<b>Contact Details</b>	
<b>Organisation</b>	Essex County Council
<b>Comment</b>	

## Flooding and Sustainable Urban Drainage

ECC as the Lead Local Flood Authority recommends changes to a series of policies throughout the Plan to ensure that consideration is given to Sustainable Drainage Systems (SuDS), minimising surface water flooding, ensure appropriate provision for water storage and minimising flood risk. The text that ECC would like to see included in the respective policies is as follows –

### Action Proposed

The text is added to specific policy comments – see these sections.



## GC16

### Contact Details



### Organisation

Saffron Walden Scout District

### Comment

#### **Submission to the Saffron Walden Neighbourhood Plan**

March 2020 – Prepared by Mark Benfold – District Commissioner, Saffron Walden Scout District.

#### **Background**

Scouting is a co-educational, multi ethnic, all abilities movement run by volunteers. Scouting exists to actively engage and support young people in their personal development, empowering them to make a positive contribution to society. Young People meet in age specific Sections: Beavers (6-8year olds), Cubs (8-10.5), Scouts (10.5-14), Explorers (14-18) and Network (18-25).

Scouting offers young people fun and challenging activities, unique experiences, everyday adventure and the chance to help others so that they can make a positive impact in the local community. By being a part of Scouting, young people have the chance to develop skills including teamwork, time management, leadership, initiative, planning, communication, self- motivation, cultural awareness and commitment. We strongly believe that it helps young people reach their full potential.

A 2016 academic study <sup>1</sup> showed the positive mental health benefits of Scouting. The conclusion said: “... This suggests that youth programmes that support resilience and social mobility through developing the potential for continued progressive self-education, ‘soft’ non- cognitive skills, self-reliance, collaboration and activities in natural environments may be protective of mental health in adulthood.”

#### **Local Scouting**

Saffron Walden Scout District covers the north half of Uttlesford with Groups in Great Chesterford, Clavering, Newport, Thaxted and Radwinter/Hempstead as well as Saffron Walden. We have circa 560 young people aged 6-18 and over 80 uniformed leaders plus other adult volunteers in support roles. In the past three years the number of young people in the Saffron Walden Scout District has grown 30% <sup>2</sup>. There has been Scouting in the Saffron Walden area for over 100 years and our local membership has risen by a further 6% in the past year <sup>3</sup>.

In the Town of Saffron Walden, we currently have two Scout Groups and an Explorer Scout Unit. In total there are 220 young people participating every week <sup>4</sup> supported by over 50 adult volunteers <sup>5</sup>. We continue to have significant and growing waiting lists with over 150 young people of Scouting age in Saffron Walden alone <sup>6</sup>. We have a further “interest” list of over 100 young people who have asked to join and who are currently below our minimum age of 6.

We rent low cost (cost effective) space in church halls, village halls and schools to run our meetings and have only two dedicated buildings in the whole District (one in Newport and one on the High Street in Saffron Walden). Access to suitable meeting places is limited and this restricts our ability to reduce our waiting list and grow Scouting. We actively recruit adult volunteers through a flexible programme built to support each individual. It is fundamental to Scouting that any young person who wants to become involved should have the opportunity to do so. The Scout District, through a fund provided by a local benefactor, supports those young people and families who wish to get involved but who might otherwise be unable to do so.

In Saffron Walden we have two Beaver Colonies (6 to 8year olds), three Cub Packs (8 to 10.5year olds), three large Scout Troops (10.5 to 14year olds) and an Explorer Unit (14 to 18year olds). One Colony, two Cub Packs, one Scout Troop and the Explorer Unit meet in the District Scout HQ building which is at 54A High Street (*adjacent the proposed development of no.56 High Street*). The other sections meet in a number of church halls with one of the Scout Troops currently meeting in Seward’s End Village Hall due to the lack of available space in the town. The Scout HQ building was built at the start of last century and has significant issues including a major damp problem and a lack of disabled access. With an active maintenance programme, the building continues to be adequate but major work is needed.

With the significant number of young people on the waiting lists in Saffron Walden Town alone, space is required for extra meetings in order to open a new Scout Group. The usage of local church halls and other social spaces is near capacity and Scouting has been unable to find suitable space to expand.

Scouting has a policy of giving priority of place to transfers of young people when they move location. The increased inflow of residents taking up local housing has resulted in existing residents having to wait significantly longer to get a place in Scouting.

#### **Urgent Needs to satisfy current demand**

New and cost-effective accommodation (preferably a new building) for a new Scout Group. This could ultimately take 100-150 young people off waiting lists. **This is required now.**

#### **Summary**

Scouting is a well-recognised movement for the development of young people including giving them a strong sense of local, national and international community. We’re asking that the community of Saffron Walden, through its Town Council and Neighbourhood Plan, actively help us in finding places for good cost-effective Scouting to take place in the community. We have itemised our needs and wants against each section / sub section to make the alignment easier to include in the NP. If there are any questions please let us know and we would be more than happy to discuss in more detail.

## **Chapter 1: What is a Neighbourhood Plan? (Page 1 to 4)**

*Agree with content - no additional comment.*

## **Chapter 2: Saffron Walden today (Page 5 to 8)**

*Agree with content plus: -*

*2.11 The high quality of amenities in Saffron Walden has brought more residents to the town increasing pressure on Scouting resources, in particular the availability of cost-effective<sup>7</sup> accommodation.*

*2.13 Infrastructure has not kept pace with demand which makes the use of the existing buildings for Scouting use challenging for the very “mobile” parents and guardians of Scouts. The increase in population of +7.8% (2011 to 2018) adds to the organic growth the organisation is enjoying.*

## **Chapter 3: Saffron Walden’s future (Page 9 to 18)**

*Agree with content plus: -*

*3.6: note 5, page 10: - Scouting agrees that Saffron Walden has a strong community feel and a “strong voluntary sector” especially in its Scout community which must be supported and protected for the benefit of the people of the town.*

*Assets to Saffron Walden :- Scouting for its young people and adult volunteer’s is a massive and sometimes unrecognised asset to the town for all of the reasons given in the summary of this report i.e. Scouting offers young people fun and challenging activities, unique experiences, everyday adventure and the chance to help others so that they can make a positive impact in the local community.*

*Opportunities for Saffron Walden: - Scouting gives young people the chance to develop skills including teamwork, time management, leadership, initiative, planning, communication, self- motivation, cultural awareness, active community participation and commitment.*

*Challenges for Saffron Walden: - Scouting continues to have significant and growing waiting lists with over 150 young people of Scouting age in Saffron Walden alone<sup>6</sup>. We have a further “interest” list of over 100 young people who have asked to join and who are currently below our minimum age of 6.*

*Page 14 Sports and recreation, item 45*

*Saffron Walden Scouting supports the following views: -*

***“45. There is a lack of community halls and facilities<sup>24”</sup> - with the potential growth in organic demand and the 15-year plan to increase the population / housing stock Scouting will require significant investment in cost effective accommodation.***

*We run 9 section meetings per week (8 in town and one at Seward’s End that should be in town). To clear the waiting list, we’d need a further 4 or 5 sessions in the short term. To allow for a simple 15-year growth forecast we’d need a further 3 sessions per week. If we improve our Cub > Scout > Explorer retention then we’d need a further 2-3 sessions per week in the next five years. That adds up to: Urgently need now - 5 more sessions within five years plus another 3 within Fifteen years and another 3. **So that's getting us to 20 sessions per week in 15 years.** This level of demand translated into accommodations would suggest adding 1 cost effective building every 5 years, so 3 buildings extra after 15 years. **– and we currently have zero available!***

*<sup>22</sup>This opinion is supported by the Uttlesford Open Space Strategy 2012 which identified a number of additional recreational facilities that should be established with contributions from developers to meet demand.*

Scouting is by virtue an out-door activity, needs facilities that allow for the safe and secure participation of its youngsters e.g. camp sites / climbing walls / open space.

<sup>24</sup> **The Neighbourhood Plan group surveyed groups with halls for hire (for example Church halls) and they all reported to be working at capacity and often having to turn down booking requests.** <sup>25</sup> This opinion is supported by Fields in Trust which recommends 3.2ha per 1,000 of population which would equate to a requirement of approximately 54ha in Saffron Walden. Current provision in Saffron Walden is around 15ha.

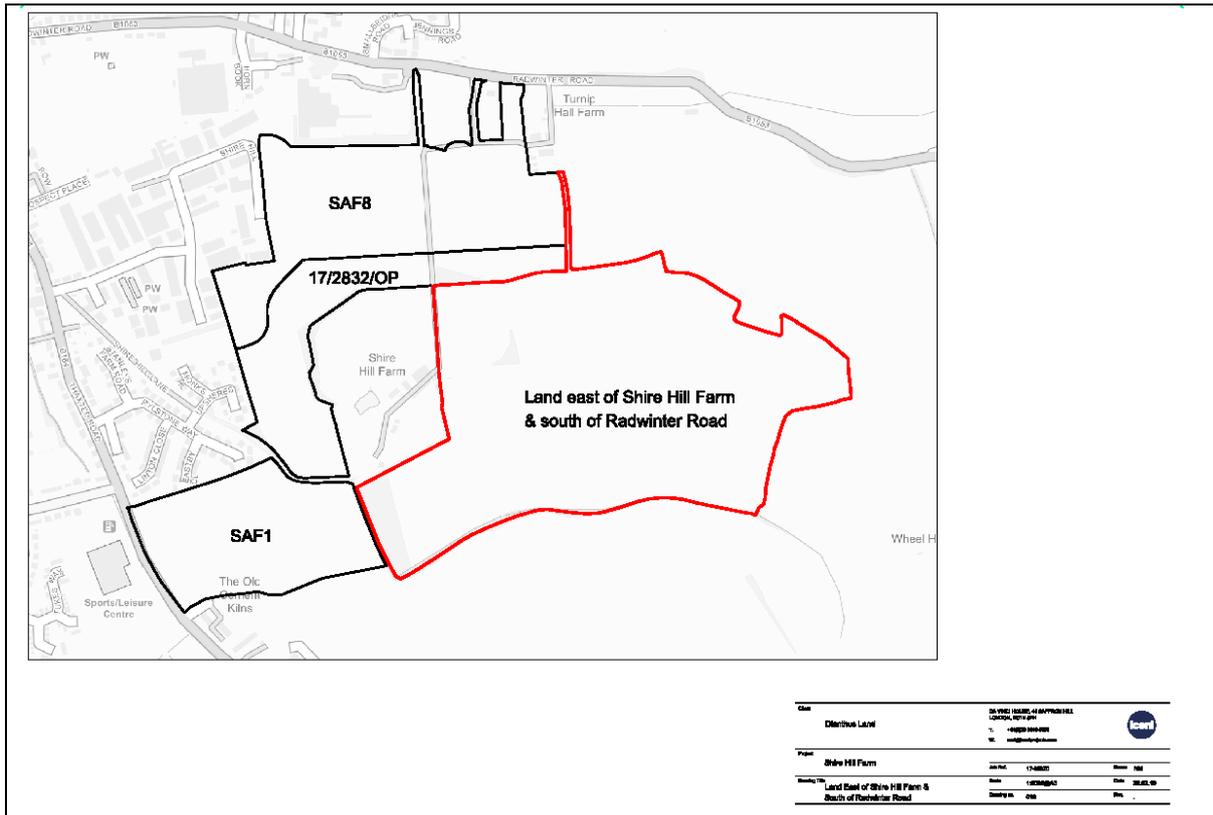
3.8 Scouting agrees with Vision statement (Page 16)

3.9 Scouting agrees with NP objectives (Page 17)

<b>Action Proposed</b>	
No action required (see later section for additional comments and actions).	

### GC17

<b>Contact Details</b>	
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p>Dianthus Land Limited , has been appointed as the Promoter by the Landowners of the Land east of Shire Hill Farm and south of Radwinter Road ('the site'). This letter provides representations on Saffron Walden Town Council's (SWTC) Saffron Walden draft Neighbourhood Plan currently the subject of public consultation.</p> <p>The landowners are promoting the 25.7 hectare site for up to 450 new homes and provision of land to facilitate an extension to the existing site safeguarded for a primary school. The extent of the landholding is shown on the plan provided at Appendix 1. Part of the landholding is subject of outline planning application (LPA Ref. UTT/17/2832/OP) for the development of 100 dwellings and provision of additional land for a primary school. The application received a resolution to grant planning permission at Uttlesford Planning Committee in December 2018, subject to the completion of Section 106 Agreement. The site has also been promoted through the Uttlesford Local Plan process.</p> <p>These representations set out the overarching context within which the Neighbourhood Plan is being prepared; highlight a number of concerns with the policies as drafted; and request that the subject site is considered for a wider allocation to meet local housing needs in Saffron Walden.</p>	



**Action Proposed**

No action proposed – The risk of doing the action suggested is that the plan is delayed by initiating a call for sites and the site is put forward anyway during that time, and then that there is no plan in place to apply to the site. To mitigate this risk continue with the plan without a new call for sites.

**GC18**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p><b>Neighbourhood Planning</b></p> <p>The preparation of a Neighbourhood Plan for Saffron Walden is fully supported. It is crucial that the information submitted to the Independent Examiner is robust.</p> <p>In determining whether a Neighbourhood Plan should proceed, the Independent Examiner must identify whether the Plan meets a series of the basic conditions<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• having regard to national policies and Secretary of State Guidance;</li> <li>• achieving sustainable development;</li> <li>• general conformity with the strategic policies contained in the development plan;</li> <li>• not breaching and being otherwise compatible with, EU obligations; and</li> </ul>	

- prescribed matters have been complied with.

These basic conditions are considered in our review of the draft Neighbourhood Plan, with shortcomings identified where applicable.

#### Uttlesford Local Plan

The draft Uttlesford Local Plan was submitted for examination in early 2019 and Stage 1 hearing sessions took place in July 2019. In January 2020, the examining Inspectors wrote to Uttlesford District Council (UDC)<sup>2</sup> expressing concern about the soundness of the plan, in particular whether there was sufficient evidence to demonstrate that the overall spatial strategy had been justified. The Inspectors concluded that they were *“of the view that withdrawal of the plan from examination is likely to be the most appropriate option”*. UDC is currently considering whether to formally withdraw or to continue with the current draft Local Plan and work to make it sound. Notwithstanding, this plan can only be given limited very weight at this stage.

The Inspectors estimated that *“it would take between 1 and 2 years, possibly longer, to complete the necessary work”* (ED82 para.124) and *“anticipate that the changes necessary would amount to its almost complete redrafting”* (ED82 para.126).

This creates a challenge for preparing a Neighbourhood Plan, which needs to be in general conformity with the strategic policies contained in the development plan for the area. It would appear that it is unlikely that UDC will be in a position to adopt a new Local Plan for another 2-3 years. On this basis, the Neighbourhood Plan must be in general conformity with the strategic policies in the Uttlesford Local Plan 2005 and the National Planning Policy Framework (NPPF). It may be appropriate to take note of the direction of the policies in the emerging Local Plan, whilst recognising that the statutory basic condition test is against the adopted Development Plan.

This primarily creates difficulty in terms of determining the appropriate housing requirement figure for the neighbourhood plan area taking account of the provisions of paragraphs 65 and 66 of the NPPF, whereby there is an onus to establish a housing requirement for a designated neighbourhood area which reflects the overall strategy for the pattern and scale of development at the District level.

#### Housing Need and Five-Year Housing Land Supply

The Planning Practice Guidance (PPG)<sup>3</sup> states that although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example *“up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development”*

It is important to highlight that the Local Plan is currently being examined under the transitional arrangements set out in the Revised NPPF and therefore the policies of the NPPF 2012 have been applied by the Inspectors. In the event UDC withdraw their draft Local Plan, the standardised method for assessing housing needs would apply, which would increase the annual requirement to 723 dwellings per annum<sup>4</sup>. At the moment, UDC can only demonstrate 2.68 years of supply against this requirement, as confirmed within a recent appeal decision dated February 2020<sup>5</sup>.

In practice, this means that UDC will need to identify more sites, particularly small and medium sites, for development to meet their housing needs and ensure that they can demonstrate a five-year housing land supply. The Saffron Walden Neighbourhood Plan could make a contribution to this.

<sup>1</sup> Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990/ Planning Practice Guidance Paragraph: 065 Reference ID: 41-065-20140306

<sup>2</sup> Uttlesford Local Plan Inspectors Letter to UDC, 10 January 2020 (Local Plan Examination Document reference 82)

<sup>3</sup> Paragraph: 009 Reference ID: 41-009-20190509

**Action Proposed**

Reflect the fact that the LP has been withdrawn in the explanatory text

**GC19**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p><b>Spatial Strategy</b></p> <p>Saffron Walden is one of two major existing settlements in the District along with Great Dunmow. It is identified as part of the top tier of the settlement hierarchy within both the adopted and draft Local Plan as it provides a broad range of services and vital facilities.</p> <p>The draft Local Plan spatial strategy (Policy SP2) included the provision of three new Garden Communities to accommodate a high proportion of housing development over the local plan period particularly from 2023. However, the Inspectors indicated this would not a suitable spatial strategy, stating:</p> <p><i>“We are concerned that the Council’s chosen strategy would mean that other sites in the district would not be developed or permitted for a significant period of time in the future. This would be likely to adversely affect the vitality and viability of services in existing towns and villages and result in a lack of housing choice in the market.”</i><sup>6</sup> (ED82 para. 31)</p> <p>This is reinforced by the fact that many of the other draft site allocations have now been built or benefit from planning permission and are expected to be built in the short term. As a result, it is sensible to direct additional development growth to Saffron Walden in the future to achieve sustainable development and to support the vitality and viability of the town into the future. It is recognised that the delivery of housing needs to be in tandem with infrastructure and services.</p> <p>In terms of remedying the current shortfalls with the spatial strategy in the draft Local Plan, the Inspectors highlighted the need to allocate more small and medium sized sites:</p>	

*In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5 year HLS, until the Garden Communities begin to deliver housing.<sup>7</sup>*

**Conformity with Strategic Policies**

Within this context, it is apparent that the Saffron Walden Neighbourhood Plan cannot yet rely on the strategic policies of the Uttlesford Local Plan to influence the direction of policies at this stage as they are highly likely to be subject to change. National policy allows for Neighbourhood Plans to come forward before an up-to-date Local Plan however, there is a requirement to try and minimise any potential conflicts between policies in both plans. The default position, as referenced above, is that the Neighbourhood Plan should conform with the strategic policies with the Uttlesford Local Plan 2005 (where appropriate) and the NPPF (given that some of the policies of the adopted Local Plan are considered to be out-of-date), while at the same time seek to avoid conflicting with the draft Local Plan policies.

The following section reviews the implications of these overarching factors at play at the District level on the evolution of the draft Neighbourhood Plan. Due regard is paid to national policy and guidance.

<sup>4</sup> Uttlesford Five Year Land Supply Update March 2019

<sup>5</sup> APP/C1570/W/19/3233882 February 2020

<sup>6</sup> Uttlesford Local Plan Inspectors Letter to UDC, 10 January 2020

<sup>7</sup> Uttlesford Local Plan Inspectors Letter to UDC, 10 January 2020

The **preparation of a Neighbourhood Plan for Saffron Walden is welcomed and supported**, however, as highlighted above, there are a number of challenges that the Town Council will need to overcome to ensure that the draft Neighbourhood Plan is found to be sufficiently robust and meets the basic conditions required within the legislation and guidance.

The Neighbourhood Plan, once adopted, will perform a very important function in the absence of an up-to-date Local Plan at the District level, and it will form part of the statutory development plan.

<b>Action Proposed</b>	

**GC20**

<b>Contact Details</b>	
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<b>Plan Period</b>	
The draft Neighbourhood Plan period extends from 2020 to 2035. A plan that sets a positive vision for Saffron Walden for the next 15 years is welcomed, particularly given the current policy	

vacuum at the District level. That said, we would question the rationale for the Policy SW1 of the draft Neighbourhood Plan covering the period from 2011-2033 given that the draft Local Plan is likely to change, as this means that the final two years of the plan period are not accounted for.

**It is requested that the draft Neighbourhood Plan is revised to ensure that policies will apply over the entirety of the 15-year plan period.**

**Action Proposed**

Amend dates as suggested

**GC21**

**Contact Details**



**Organisation**

Iceni Projects on behalf of Dianthus Land Ltd.

**Comment**

**Environmental Assessments**

Directive 2001/42/EC, known as the Strategic Environment Assessment (SEA) Directive, which deals with the assessment of the effects of certain plans and programmes on the environment is critical in the consideration of whether the Neighbourhood Plan is compliant with the basic condition to be compatible with EU obligations.

The Planning Practice Guidance (PPG) advises that draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects through a 'screening' assessment<sup>12</sup>. The PPG refers to SEAs potentially being required where a neighbourhood plan allocates sites for development, which the draft Neighbourhood Plan does.

There are a number of references to the 2015 UDC Strategic Environmental Assessment within the draft Neighbourhood Plan however, it is not clear whether a separate screening assessment of the plan has been undertaken.

In addition to the SEA Directive, Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds may also apply. Again, it is not clear whether due consideration has been given these directives and sufficient information to enable an appropriate assessment or a screening to determine whether an appropriate assessment is necessary has been provided.

We would highlight that as a minimum, a screening for environmental effects is required for the draft Neighbourhood Plan to meet the basic conditions.

**It is requested that the SEA and Habitats Regulation Assessment screening assessments of the draft Neighbourhood Plan are made available.**

<sup>12</sup> PPG, Paragraph: 073 Reference ID: 41-073-20190509

**Action Proposed**

Make the SEA and HRA screening available

Otherwise the comments do not make specific suggestions about changes to the SWNP.

**GC22**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p><b>Evidence Base</b></p> <p>The draft Neighbourhood Plan sets out how the Saffron Walden Neighbourhood Plan was researched (paragraphs 1.17-1.18). It is clear that the evidence and background studies to the draft Uttlesford Local Plan have been used. This approach is considered to be sensible and the positive and proactive engagement between the Town Council and UDC and therefore minimises the likelihood for conflict between the emerging policy at different tiers.</p> <p>Notwithstanding, given that the UDC is likely to have to revisit their evidence base to the draft Local Plan, the draft Neighbourhood Plan should take account of any emerging evidence or should be grounded in standalone evidence. It will be necessary to submit robust evidence to support the choices made and the approach taken and to explain the rationale of the policies<sup>13</sup>.</p> <p><sup>13</sup> Paragraph: 040 Reference ID: 41-040-20160211</p>	
<b>Action Proposed</b>	
None	

## SW1 Saffron Walden Neighbourhood Plan site allocations spatial strategy

### 1-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
<p>Point 4 only allows development other than the identified allocated sites where it is community led or brought forward by a Community Land Trust. This policy could be seen as over restrictive and need to provide further clarity as to the circumstances in which infill development would be permitted and to better define what is meant by 'community led' – and the bodies that would be considered to be community focused.</p> <p>Specifically, the following changes are recommended:</p> <p><b>1:</b> the KEVI site should be identified as a site allocation. Justification can be made on the basis that the scheme would make efficient use of a previously developed site and deliver a high proportion of 1bed and 2bed units that meet identified needs.</p> <p><b>2:</b> further clarity is provided on the definition of 'community led' development or identify schemes that deliver 100% affordable housing requirement as another supporting criteria.</p> <p><b>3:</b> explicit support should be given for infill development where this meets other policy requirements elsewhere in the SWNP (it is noted that infill development is noted / referenced elsewhere in the Plan but isn't explicitly supported as part of the overarching spatial strategy).</p>	
<b>Action Proposed</b>	
<p>1) This is a sensitive site as was identified by the previous planning application for the site which was withdrawn by the applicant (reasons not known). 18.03.20 have emailed respondent to ask for further guidance on this point.</p> <p>2) Review wording of community led development references to ensure that policies are not accidentally detrimental to Almshouses.</p> <p>3) Review plan and consider whether the policies on infill development go far enough.</p>	
<input checked="" type="checkbox"/>	

### 1-2

<b>Contact Details</b>	planning.ipswich@environment-agency.gov.uk
<b>Organisation</b>	Environment Agency
<b>Comment</b>	
<b>Flood Risk</b>	

Following our review of the Saffron Walden Neighbourhood Plan we note that flood risk is not specifically covered within the plan. The National Planning Policy Framework in combination with the Local Plan contains policies to ensure flood risk associated with developments is controlled. However; the neighbourhood plan has a significant contribution to make to improve flood risk within the plan area. Flood risk is an important consideration involved in the production of planning documents and we suggest that including further references to reducing flood risk could be made within the plan.

Saffron Walden is within a topographic 'dip' that results in rainfall being concentrated into the local watercourses which flow through a central culvert through the town. This culvert is the focus of several studies which aim to determine its condition, lifespan and potential remediation strategies to prolong its lifetime.

The culvert runs through the centre of Saffron Walden and is under the ownership of several riparian land owners; this includes commercial and residential properties along its course. There are several other small culverts that convey watercourses through Saffron Walden. The failure or the blockage of these culverts can significantly increase the risk of flooding to Saffron Walden.

The Flood Map for Surface Water and previous surface water floods highlights that Saffron Walden is at risk of flooding from surface water although this is the responsibility of the Local Lead Flood Authority which is Essex County Council in this case.

The impacts of climate change have the potential to increase the likelihood of flooding and will need to be taken into account when allocating and designing developments. Developments will need to avoid areas of flood risk, ensure that they don't damage the surface water and fluvial infrastructure i.e. culverts, and contribute to the overall reduction in local flood risk.

The authors should review the Strategic Flood Risk Assessment, the Local Plan and the requirements of the Lead Local Flood Authority (Essex County Council) to determine whether they feel that flood risk has been appropriately managed or whether specific policies are appropriate within the SWNP.

Should any new development be sited within the floodplain consideration should be given to our general flood risk guidance below. [general flood risk guidance widely available and not copied and pasted here, although was provided by EA in response]

<b>Action Proposed</b>	
No additional development footprint proposed on floodplain. Paragraph 8.5 refers to EA guidelines. No changes to policy but TC to remain mindful of EA requirements especially when planning any maintenance works on TC land.	

1-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	Page 19: Paragraph 4.1.2 – The housing land supply was updated in October 2019 and stands at 2.68 years. This paragraph needs to be rewritten in view that the Housing Land Supply is currently less than 3 years.
<b>Action Proposed</b>	
Rewrite paragraph	<input checked="" type="checkbox"/>

1-4

<b>Contact Details</b>	[REDACTED]
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<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
Paragraph 4.1.3 – It should be noted that the UDC eLP indicates that 1,393 dwellings will be built in Saffron Walden on sites of 6 dwellings or more. It does NOT include dwellings on sites of 5 or less dwellings. This should be made clear. It may also be worth noting that this situation could change as it has been indicated to UDC that there is a need for more small and medium sized sites.	
<b>Action Proposed</b>	
1) Make clear as per first point. 2) Recognise and acknowledge that government is pushing for more small and medium sized sites to be developed as they get built out faster than larger sites, however the only undeveloped spaces around SW are whole fields and it is unlikely that small sections of field would come forward, over and above whole fields. <input checked="" type="checkbox"/>	

#### 1-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policy SW1</b>	
This Policy is confusing because of the way it has been structured in that the strategy and Site Allocations policies are not clearly defined.	
It would be clearer if the Strategy part of the policy would start by stating that “The <i>housing requirement for Saffron Walden during the period XXXX to 2033 is X number of dwellings not including sites of 5 dwellings or less. This will be met through existing emerging Local Plan allocations and planning consents. In addition, the following residential development will be supported:</i>	
<i>Within Town Development Limits (as defined on Map xx)</i>	
- Infill subject to policy criteria laid out in this plan and the Local Plan	
<i>Outside Town Development limits:</i>	
- xxxxx	
- yyyyy	
- zzzzz	
<i>In addition, community-led development (including proposals brought forward by a Community Land Trust groups beyond development limits would be supported.”</i>	
<b>Action Proposed</b>	
Amend text to make it clearer as suggested. <input checked="" type="checkbox"/>	

#### 1-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	

**SWI Point 5:** Note that there is currently uncertainty with the emerging Local Plan and the effectiveness of this particular point should not depend on the eLP but on the adopted plan which has the same Policies. These Policies should apply to the SWNP based on the adopted plan and not conditional on the emerging Local.

Please can you evidence why the community-led development (including development by Community Land Trust groups) should only be affordable housing.  
The second part of the policy would then go on to each of the three allocations.

**Action Proposed**

Amend / evidence as suggested.

1-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policy SW1:</b> Point 3 Land at Shire Hill: Why does the policy not consider and include the proposed allocation North of Thaxted Road (SAF1) Outline Planning Permission UTT/18/0824/OP. An explanation is needed why SAF1 is not proposed for allocation especially given that paragraph 4.18 refers to Land North of Shire Hill only proceeding with a spine road linking developments to the north and south, the latter being the SAF1 allocation. The SWNP Appendix 1 – Strategic local plan policies includes Policy SP3 on the scale and distribution.</p> <p><b>Policy SW1:</b> Point 3 should also make a cross reference to policy SW31 that requires education provision on the site.</p>	
<b>Action Proposed</b>	
<p>1) SAF1 has outline permission and is proceeding with reserved matters application, and so is at a more advanced stage than the other site Land North of Shire Hill, and was considered by steering group as unlikely not to get permission in some form or another. This is why it wasn't included in site allocations. However it could be added as a formality.</p> <p>2) Address SW1 point 3 as noted above. <input checked="" type="checkbox"/></p>	

1-8

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Savills on behalf of Chase New Homes (owner of former Friends School site)
<b>Comment</b>	
<p>The site is no longer in use, having been closed since 2017. There has been no public access to the site since 2018. Prior to this, the use of the playing fields was limited to occasional access for sports groups at evenings and weekends.</p>	
<b>Action Proposed</b>	
<p>None – sports groups had regular and frequent use of the site at evenings and weekend – not “occasional”.</p>	

## 1-9

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	Policy SW1. Spatial Strategy Continued concentration of development on east side of Saffron Walden (SW) is undesirable, as increased traffic volume makes access to local employment sites and services (e.g. Radwinter Road Health site) much more difficult and time consuming.
<b>Action Proposed</b>	No action required.

## 1-10

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	Policy SW1 SWNP – Spatial Strategy – Site allocations for residential developments SAF3, and SAF4 (Page 23, 24), SW3 (page 29), SW4 (35), SW5 (page 37), SW6 (Page 38), SW 10 (page 54)  ECC recommends that the following wording be set out in the respective policies –  <ul style="list-style-type: none"> <li>- <i>“Sustainable drainage system (SuDS) must be incorporated in any new developments and promote the use of multifunctional space to create healthy environment for people.</i></li> <li>- <i>No flooding as a result of new development; appropriate measure to mitigate onsite and offsite surface water flooding.</i></li> <li>- <i>Rainwater harvesting/grey water recycling are the alternative ways to design sustainable urban drainage and favoured the development with limited greenspace to mitigate flood risk.</i></li> <li>- <i>Surface water conveyance and onsite storage using non-traditional drainage measures to achieve water quality”.</i></li> </ul>
<b>Action Proposed</b>	
Amend as suggested.	<input checked="" type="checkbox"/>

## 1-11

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	I am concerned about the proposed development both here, and on the water-meadow near the duck pond. I concerned about parking, safe pedestrian routes (no pavements on Freshwell Street), pollution, development within protected areas, restrictions to views.
<b>Action Proposed</b>	
None required	

1-12

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	<p><u>Saffron Walden Neighbourhood Plan Site Allocations</u> – ECC notes that the table on page 20 does not include UDC Local Plan (Regulation 19) Policy SAF Land at De Vigier Avenue (UTT/18/2297). It is recommended that this site be included.</p> <p><u>Policy SW1 SWNP – Spatial Strategy</u> – ECC recommends that within this policy at page 25 where it sets out the provisions for Shire Hill (UTT/17/2832/OP) it should include 0.9ha of safeguarded D1 use ‘education’ land, this is set out in Policy SAF 8 of the UDC Local Plan (Regulation 19). The policy should also include reference to ‘Manor Oak’ (UTT/13/3467) which provides 1.2ha of required site. Collectively these sites will provide for 2.1ha for D1 educational use. These land allocations should be joined making one single site. It is important that ECC has the relevant policy provisions to deliver sufficient land for the delivery of a new primary school.</p> <p>ECC recommends that the policy includes reference to a masterplan. This will ensure that the spine road is located away from the pedestrian entrance to the school providing safe walking and access.</p>
<b>Action Proposed</b>	
<p>1) Do not include this site as suggested</p> <p>2) Add reference to masterplan as suggested in Policy point 3. <input checked="" type="checkbox"/></p>	

1-13

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	

**Representation 1 – Section 4.1 – Saffron Walden Neighbourhood Plan Site Allocations - Objection**

Paragraphs 4.1.1 - 4.1.6 explain how the housing target for Saffron Walden, as defined within the SWNP, has been set. It is confirmed that the future housing need in Saffron Walden has been fully informed by the Spatial Strategy of the emerging Uttlesford Local Plan (EULP). For clarity, the Spatial Strategy of the EULP is set out in its Draft Policy SP2. It states that the majority of development will be focused on the towns of Saffron Walden, Great Dunmow and at new Garden Communities at Easton Park, West of Braintree and North Uttlesford.

Draft Policy SP3 of the EULP sets out the scale and distribution of housing development. It confirms that of the 14,000 net additional dwellings that are required between 2011 and 2033, 6,380 dwellings are to be provided through new allocations. Of these 6,380 dwellings, 4,820 dwellings are to be provided across the three Garden Communities. With 76% of the planned growth to be provided within the Garden Communities, Draft Policy SP3 identifies that new allocations for only 315 dwellings are required to be provided within Saffron Walden (in addition to those which have either already been built or have been granted planning permission).

At the time of drafting the SWNP there was a logic to aligning the growth aspirations of the SWNP with those of the EULP. Both the SWNP and EULP were progressing concurrently.

The EULP had also been submitted for Examination and Hearing Sessions were being held over the summer of 2019.

On 10<sup>th</sup> January 2020 however (and only 2 weeks before this consultation period for the SWNP commenced), the Inspectors provided their initial observations in response to Stage 1 of the EULP hearing sessions. This letter confirms that the Inspectors have:

*“significant concerns in relation to the soundness of the plan. In particular we are not persuaded that there is evidence to demonstrate that the Garden Communities, and thus the overall spatial strategy, have been justified. We therefore cannot conclude that these fundamental aspects of the plan are sound.”*  
(paragraph 2)

The Inspectors have raised fundamental concerns that go to the heart of the Spatial Strategy of the EULP. It is stated that the Sustainability Appraisal failed to adequately consider all reasonable alternatives. Alternative options for growth did not for example consider the possibility of fewer than 3 Garden Communities being delivered together with increased growth in and around existing settlements (paragraph 9).

In their conclusions, the Inspectors stated that the Garden Communities are insufficiently justified and have not been shown to have a reasonable prospect of being delivered. The spatial strategy set out within the EULP has therefore been found to be unsound (paragraph 112).

In paragraphs 114 and 115 the Inspectors set out potential remedies. Here it is stated that

*“in order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short and medium term..... Hand in hand with this approach, our view is that the Council should delete one of the Garden Communities from the plan”*

As a result of the above, the Spatial Strategy upon which the SWNP is based is now known to be fundamentally flawed. With a significant reduction in the number of new homes able to be delivered within new Garden Communities in the period up to 2033, additional growth is going to have to be located within and next to existing towns and villages. As a result, both the Spatial Strategy which has informed the SWNP and its supporting evidence base are flawed. The rationale for the approach taken with the SWNP towards future housing need is not supported by credible evidence and it has not been demonstrated how the SWNP will contribute towards the delivery of sustainable development.

If adopted, the SWNP would have the effect of constraining growth at Saffron Walden to the suppressed levels that could only be justified if 76% of the future planned growth for the District was being delivered by three new garden communities. This is no longer possible.

As the EULP is no longer to be adopted alongside/ahead of the SWNP, in order to comply with the Regulations regard must be given to the general conformity of the SWNP with the strategic policies of the development plan that is in force. This is the Uttlesford Local Plan 2005. While the 2005 Local Plan is now time expired, its Spatial Strategy for new housing development is set out in Policy H1. This confirms that the key focus for growth will be the re-use of existing buildings and previously developed land and unused land within development limits of the main urban areas, and urban extensions to the main urban areas.

The SWNP notes that between the period 2011-2033 it is envisaged that a total of 1,460 dwellings will be provided within and around Saffron Walden. When considering the district as a whole which requires a minimum of 14,000 new dwellings to be delivered, this is a modest scale of growth at what is the key settlement in the district. Such an approach does not therefore comply with the spatial strategy of the Development Plan that seeks to ensure the main urban areas are the focus for growth. Furthermore, focusing on the time period of the SWNP itself (2020-2035), the proposed allocation of just 122 dwellings in and around Saffron Walden is certainly not consistent with the strategic policies of the development plan. The suggested approach is therefore in conflict with national guidance and fails to demonstrate how the SWNP is based on sufficient and proportionate evidence that guides future development to sustainable solutions.

As the Spatial Strategy goes to the heart of the SWNP it is considered that significant revisions are now required to be made to SWNP as whole. Without significant updates it will not be possible to confirm that the SWNP is consistent with the strategic policies of the development plan and able to contribute towards the delivery of sustainable development.

<b>Action Proposed</b>	
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None – <u>Sustainable</u> development is development that meets the needs of the current generation without compromising the needs of future generations. No development is sustainable in this internationally recognised sense without policies in place such as are found in this plan. Otherwise it's just development. Therefore delaying the plan would in	
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fact contribute to unsustainable development. Progress with plan in order to achieve sustainable development.

1-14

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	
<p><b>Representation 2: Saffron Walden Neighbourhood Plan site Allocations (SW1) – page 20 - <b>Objection</b></b></p> <p>Table 1 sets out those sites which the SWNP is seeking to allocate for housing. The table lists (1) those sites which have planning permission, (2) those sites allocated by the SWNP and (3) those sites listed in the EULP but not allocated in SWNP. In this final category only one site is listed, this is land at De Vigier Avenue (site SAF5)</p> <p>Site SAF5 accords with the land being promoted by Turnstone St Neots Ltd to the north of De Vigier Avenue. We object to the SWNP’s non allocation of this site</p> <p>An outline application for 12 dwellings was submitted to Uttlesford District Council in 2019. This application was refused by the Planning Committee (contrary to the Officer recommendation) because of concerns relating to the ecological impact of the development. That refusal has been appealed and a decision is likely to be made in summer 2020.</p> <p>Site SAF5 was identified as a draft allocation in the EULP. It was identified as the Council’s evidence base demonstrated that it is an appropriate, deliverable and sound location to accommodate a small-medium sized residential development on the edge of Saffron Walden. The site was positively assessed within the Council’s Sustainability Appraisal and no objections were raised by the Local Plan Inspectors in the context of the EULP.</p> <p>As noted above, the Local Plan Inspectors have confirmed that more housing needs to be allocated in and around the main settlements and that more small and medium sized sites are required to deliver homes in the short and medium term. Site SAF5 is available for development and can deliver housing in the short term. It will make a positive contribution to the early delivery of housing in the District and to the Council’s 5 year housing land supply.</p> <p>No justification is provided alongside this table to justify the non allocation of site SAF5. As more sites (rather than fewer) clearly need to be allocated to meet the identified need for new homes, the decision not to allocate site SAF5 is not justified. The decision to remove the allocation also does not accord with the strategic policies of either the adopted or emerging Local Plan and no clear justification for the approach taken within the SWNP has been given. This policy is therefore contrary to the basic conditions of the Town and Country Planning Act 1990.</p>	
<b>Action Proposed</b>	

None

1-15

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	<p><b>Representation 3: Policy SW1 - Objection</b></p> <p>Turnstone St Neots Ltd objects to Policy SW1.</p> <p>Paragraph 4.1.8 of the SWNP states that it is appropriate to include within Policy SW1 <u>all</u> allocations identified for housing in the emerging Uttlesford Local Plan. Policy SW1 does not however allocate land at de Vigier Avenue which is one of the sites identified as a draft housing allocation – allocation SAF 5.</p> <p>As set out within our representation lodged in respect of the table provided on page 20 of the SWNP, there is no justification provided for omitting site SAF5. As more housing needs to be provided in and around Saffron Walden, and specifically on small and medium sized sites that are capable of delivering housing now, the exclusion of site SAF5 is not justified and is inconsistent with the strategic policies of the adopted and emerging Local Plan.</p> <p>Section 4 of Policy SW1 is also not justified. While it notes that the housing requirement set out within the SWNP is not a ceiling for housing growth, it states that any additional development outside the identified allocations or beyond the development limits will only be supported if very specific criteria are met and such development is exclusively for affordable housing.</p> <p>Section 4 of Policy SW1 therefore has the effect of significantly restricting growth at Saffron Walden. As noted in earlier representations, Uttlesford District Council is either going to have to introduce fundamental changes to its emerging Local Plan or withdraw it and start again. Whichever course of action is taken, more housing growth is going to have to be identified and Saffron Walden, being the most sustainable location for the growth within the District, is very likely to have to take a greater share of the planned growth.</p> <p>The stated restriction on growth occurring beyond those sites allocated in the SWNP, or beyond the existing limits of the town will prevent the delivery of sustainable development across the District. In light of the recent findings of the EULP Inspectors, the approach taken within Policy SW1 is not supported by a credible evidence base and is therefore contrary to the basic conditions of the Town and Country Planning Act 1990.</p>
<b>Action Proposed</b>	
None	

<b>Contact Details</b>	[REDACTED] [REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p><b>Policy SW1 SWNP Spatial Strategy</b></p> <p><i>Site allocations</i></p> <p>The Table provided on Page 20 of the draft Neighbourhood Plan identifies the site allocations proposed. This includes dwellings built between 2011-2016 and site with planning permission granted. It is argued that these sites do not need to be included within the draft Neighbourhood Plan as they do not relate to the plan period.</p> <p>The draft Neighbourhood Plan carries forward a number of site allocations from the draft Local Plan including SAF3 and SAF4. The PPG states neighbourhood planning should not re-allocate sites that are already allocated through strategic plans<sup>9</sup>. That said, taking account of the current status of the draft Local Plan, these sites should only be allocated for development if they represent the preferred development locations in line with the spatial strategy for Saffron Walden and justified with proportionate evidence. The position should be kept under review.</p> <p>In a scenario where a neighbourhood plan is coming forward in advance of Local Plan, the PPG<sup>10</sup> indicates that neighbourhood plans should consider allocating reserve sites to ensure that emerging evidence of housing need is addressed. This will help to ensure that the policies in the Neighbourhood Plan are not overridden by a new local plan.</p> <p>The NPPF (para. 69) outlines that neighbourhood planning groups should consider the opportunities for allocating small and medium sized sites suitable for housing in their area. This also aligns with the advice from the Inspectors in respect of the draft Local Plan.</p> <p><b>It is recommended that the draft Neighbourhood Plan seeks to allocate additional sites and potentially reserve sites, particularly small and medium sites, to meet local needs.</b></p> <p><i>Land north of Shire Hill Farm</i></p> <p>The allocation of Land North of Shire Hill Farm within Policy SW1 (3) is welcomed and fully supported. The policy criteria setting out the site-specific requirements are noted and are considered to be generally acceptable. However, planning application reference UTT/17/2832/OP already benefits from a resolution to grant for planning permission, subject to Section 106 Agreement. As such, the site-specific requirements are only considered to be necessary for future planning applications, in a scenario where application reference UTT/17/2832/OP does not come forward.</p> <p><b>It is requested that the policy wording is updated to clarify that the site-specific requirements will apply to new planning applications on the site only.</b></p> <p><i>Additional Development</i></p> <p>Policy SW1 (4) states that “the housing requirement is not a ceiling for housing growth” which is</p>	

considered to be a positive policy approach, which is encouraged. However, the policy seeks to restrict development to community-led development and proposals brought forward by a Community Land Trust Group for affordable housing. This approach does not represent planning positively for new homes and therefore is contrary to the Government’s objective of significantly boosting the supply of homes as set out in the Housing White Paper (2017)<sup>11</sup> and the NPPF and therefore does not meet the basic condition to have regard to national policy. This is pertinent in this location as UDC cannot currently demonstrate a five-year housing land supply and local housing needs are not currently being adequately met.

**It is requested that Policy SW1 (4) is revised or removed in order to ensure that the basic condition to have to regard with national policy is met and the Neighbourhood Plan can progress.**

<sup>9</sup> Paragraph: 044 Reference ID: 41-044-20190509

<sup>10</sup> PPG, 009 Reference ID: 41-009-20190509

<sup>11</sup> DCLG (2017) Fixing our broken housing market.

**Action Proposed**

- 1) No significant revisions to the SWNP as outlined above.
- 2) No rewording, policies must apply to all new developments.
- 3) No change required – the suggestion that only development by developers such as Icen Projects Ltd can be regarded as “planning positively”, while community led development is not “planning positively” does not stand up to critical analysis. There are several hundred permitted dwellings in SW not yet built. It is not local or national planning policy that is constraining supply of new homes in SW, accordingly adjusting the draft NP would not boost supply flow.

**1-17**

<b>Contact Details</b>	
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	<p><b>Future Housing Requirement</b></p> <p>Paragraph 65 of the NPPF outlines that strategic policy making authorities (UDC in this instance), should establish a housing requirement figure for their whole area and “<i>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 allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.</i>”</p> <p>In instances where strategic policies are out of date, Paragraph 66 of the NPPF states:</p> <p><i>“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</i></p>

*of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”*

The challenge for the draft Neighbourhood Plan coming forward ahead of the Local Plan is that there is no housing requirement figure for Saffron Walden established as part of an up to date development plan. As such, the Town Council should request an indicative housing figure from UDC to ensure that the strategy proposed is sufficiently robust and also future proofed.

It is requested that Saffron Walden Town Council request a revision of the indicative housing requirement for Saffron Walden from UDC and Policy SW1 Spatial Strategy is updated accordingly.

This will help to minimise the risk that the neighbourhood plan figure will be superseded when new strategic policies are adopted.

It is also important as, once adopted, the Neighbourhood Plan will constitute part of the development plan against which future development proposals will be assessed. In situations where the presumption of sustainable development applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits provided<sup>8</sup> the neighbourhood plan contains policies and allocations to meet its identified housing requirement (NPPF paragraph 14b).

This means that if policies and allocations in the Saffron Walden Neighbourhood Plan do not meet the housing requirement in full, they will not be afforded the same weight in decision making and the benefits of having a plan in place will not be realised. To be effective it is considered that the Neighbourhood Plan needs to firstly understand the housing requirement and then secondly to allocate sufficient land to meet their needs.

**It is requested that Policy SW1 (4) is revised or removed in order to ensure that the basic condition to have to regard with national policy is met and the Neighbourhood Plan can progress.**

<sup>8</sup>Our emphasis

<b>Action Proposed</b>	
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As above	
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## 1-18

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
As indicated above, the inclusion of part of the site within Policy SW1(3) is fully supported. It is requested that Saffron Walden Town Council consider the allocation of further land east of Shire	

Hill Farm and south of Radwinter Road.

In the absence of an up-to-date Local Plan, it is likely that the Saffron Walden Neighbourhood Plan will provide the policy framework against which planning applications will be determined. However, to be effective, the neighbourhood plan must include policies and allocations to meet its identified housing requirement. It is our view that in order to be considered robust and fit for purpose, the draft Neighbourhood Plan will need to allocate additional sites prior to submission for Independent Examination.

The Land at Shire Hill Farm comprises a 25.7 hectare site, with the potential capacity for up to 450 new homes in total and provision of land to facilitate a potential extension to the existing site safeguarded for a primary school. This figure includes the 100 homes subject to planning application reference UTT/17/2832/OP.

Due to the presence of the committed Land at Radwinter Road to the north, which is the Linden Homes site, allocated as Policy SAF8 in the draft Local Plan and is currently under construction, and the land subject of planning application reference UTT/17/2832/OP, there is a clear logic for additional development in this location.

**We request the opportunity to work with you to further explore the contribution that the subject site can make to the Neighbourhood Plan.**

<b>Action Proposed</b>	
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No action required by SWNP
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**1-19**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	<p>The proactive approach of the Saffron Walden Town Council to prepare a Neighbourhood Plan for the town is supported. Taking account of the wider planning context and the fundamental issues that have arisen through the examination process of the draft Uttlesford Local Plan, the importance of this document as part of the development plan and as a guide for future development is heightened. In order to maximise the chances of the Neighbourhood Plan being able to progress through the changes:</p> <ul style="list-style-type: none"><li>• Saffron Walden Town Council should request a revision of the indicative housing requirement for Saffron Walden from UDC and Policy SW1 Spatial Strategy should be updated accordingly. This is to ensure that the plan contains policies to meet its identified housing requirement, can be relied on for decision making and will also minimise the risk that the neighbourhood plan figure will be superseded when new strategic policies are adopted.</li><li>• In line with an increased housing requirement, it is recommended that the draft Neighbourhood Plan seeks to allocate additional sites, particularly small and medium sites and potentially reserve sites to meet local needs. This will also help to ensure that the policies in the Neighbourhood Plan are not overridden by a new local plan.</li></ul>

- The policy wording of Policy SW1 (3) is updated to clarify that the site-specific requirements will apply to new planning applications on the site only.
- Policy SW1 (4) restricts additional development and thereby is not aligned with the government objective to significantly boost the supply of housing, is revised or removed in order to ensure that the basic condition to have to regard with national policy is met and the Neighbourhood Plan can progress.
- The wording of Policy SW31 is updated to fully reflect the draft Section 106 Agreement in terms of the future uses so that it can be considered to be deliverable.
- the draft Neighbourhood Plan should be revised and updated to ensure that policies will apply over the entirety of the 15-year plan period;
- the SEA and Habitats Regulation Assessment screening assessments of the draft Neighbourhood Plan should be made available. In the event that the plan has not been screened, this should be undertaken to ensure the legal requirement of the applicable Directives have been met and the plan is not in breach of any EU obligations.
- The allocation of further land east of Shire Hill Farm and south of Radwinter Road is considered to ensure that future housing requirements are met in a sustainable fashion.

**We request the opportunity to meet with you to discuss the contents of these representations and the potential contribution that the land at Shire Hill Farm could make to the Neighbourhood Plan.**

**It is also requested that we are kept informed of any progress in relation to the Saffron Walden Neighbourhood Plan.**

<b>Action Proposed</b>	
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No action required by SWNP
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**1-20**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Savills on behalf of Chase new Homes
<b>Comment</b>	

6.3.	As noted in the table, only sites SAF 3 and SAF 4 are not currently in the planning process. It is understood that the land at Shire Hill, which has been submitted for planning, has not yet been granted permission, therefore, based on these figures, the SWNP is only seeking allocations for 122 dwellings. As the site is a sustainable location, as set out in 3.19-3.23, it is considered that the proposed growth levels do not reflect the classification of the town in the settlement hierarchy (adopted and emerging). The limited identification of additional sites within the NP is considered to be constraining sustainable development, which would be contrary to 'basic condition (a)'.
6.4.	The undetermined planning application at the Former Friends School is not currently included within policy SW1. It is considered that the application, which could deliver at least 100 new homes, including affordable units, could make a considerable contribution to the town's housing figures. In addition, as set out in 3.24-3.26, the scheme would also re-open leisure facilities on the site, whilst providing new facilities which would be for use on a permanent basis, not only for the new residents associated with the development, but also for the wider population. Inclusion of this site within the SWNP would enable the community to fully engage with the application and secure these new, permanent facilities for Saffron Walden.
6.5.	Given the uncertain situation regarding the emerging Local Plan it is considered wholly premature to propose Local Green Spaces on sites within and on the edge of Saffron Walden which is identified as a sustainable location for new development. The Local Plan Inspectors' letter dated 10 January 2020 specifically states at paragraph 174 <i>"In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the five year HLS, until the Garden Communities begin to deliver housing."</i> Consequently, we believe this Neighbourhood Plan needs to be flexible in order to respond to the emerging Local Plan and not propose Local Green Spaces which may prejudice sustainable development locations within the town.

<b>Action Proposed</b>	
None – the whole point of Local Green Spaces is to preserve important green spaces for social, ecological and economic community reasons as an area develops. The notion of getting rid of LGSs in order to support development would completely negate their purpose. Since they continue to exist, there is no reason to assume that their original purpose is not needed, and therefore there is no sound reason to remove Local Green Spaces from the SWNP.	

## SW2 Protection of views

### 2-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p>Supporting text in paragraph 4.1.9 is very limited in terms of explaining the rationale behind the identified views.</p> <p>This policy is too limited and not enforceable by just commenting on ‘views over the town’. Within the settlement envelope the policy should acknowledge the quality of the spaces between structures and the vistas and views that unite or disrupt them. The relationship with adjoining open areas and landscape is also important.</p> <p>An acknowledgement of views into the settlement should also be considered.</p> <p>Important individual views should be noted within site specific policies. All views should be plotted to mapping so that there is no ambiguity. 2.9 of the SWNP notes the plan ‘maps the key views’. There is no clear mapping provided in the draft SWNP document</p> <p>The Saffron Walden Conservation Area Appraisal UDC 2018 identifies a number of important views within the historic core whilst the Historic Settlement Character Assessment Saffron Walden UDC 2007 highlighted important vistas at many of the entry points to the town.</p> <p>Consideration might also be given to a specific policy on views into and out of especially sensitive key areas, such as the Market Square.</p> <p>Has the work undertaken as part of the AECOM study been used to give more detail. Also, can these views also be supported by other existing evidence? For example the Conservation Area Character Appraisal (Jan 2018) or the Historic Settlement Character Assessment (2006).</p> <p>The word “detrimental” implies quite a degree of flexibility in terms of what development would be allowed whilst damaging the views. Is this the intention? To apply this policy as a planner and applicant properly would require an understanding of the characteristic of each of these views. This information is currently missing. To make sure the policy is implemented as intended more detail is needed to support this policy.</p> <p>Please also note that the examiner is likely to visit the viewpoint of each of these views. You will therefore need to make it clear where these are. They should all be from public view points rather than from private land that is not enjoyed by the wider community. A map with arrows clearly pointing to the views would be helpful.</p>	
<b>Action Proposed</b>	
Amend as proposed <input checked="" type="checkbox"/>	

### 2-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Gladman
<b>Comment</b>	
<p>Policy SW2 seeks to allocate a Locally Valued Landscape Area to protect the visual qualities and distinctive character of the area. This policy states that development will only be permitted that is not detrimental to the rural character, scenic quality or visual amenities of the area. Development will not be permitted where the impacts of development cannot be mitigated.</p>	

Gladman are concerned that the proposed policy will seek to prejudice the delivery of sustainable development proposals from coming forward. The emphasis of this policy is on the 'protection' of the landscape/views of the surrounding area rather than seeking to integrate new sustainable development opportunities within the existing landscape and character of the local area. Furthermore, to be valued, a view would need to have some form of physical attributes demonstrating its significance. The policy must allow for a decision maker to come to a view as to whether particular locations contain physical attribute that would 'take it out of the ordinary' rather than designating vast swathes of land which may not have any landscape significance and are based solely on community support. Opinions on landscape are highly subjective therefore without robust evidence to demonstrate why these areas are considered special beyond the fact that they are 'an area of attractive and unspoilt countryside'. Gladman recommend that this policy is deleted.

<b>Action Proposed</b>	
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None
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2-3

<b>Contact Details</b>	[REDACTED]
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<b>Organisation</b>	
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<b>Comment</b>
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With regard to policy SW2, I am in complete agreement about protection of views. Saffron Walden nestles in a valley and this should be preserved as far as possible. It appears that most of the new developments are being built on high land and stand out like a sore thumb, spoiling many of the beautiful views. I know the new B&M is a commercial building but it has ruined the view from Cole End. It could at least have been painted black so it does not dominate the view.

<b>Action Proposed</b>	
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Add a policy in Design so that commercial buildings are clad in materials that blend into the countryside? <input checked="" type="checkbox"/>
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## SW3 Site allocation – land at Viceroy Coaches

### 3-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policy SW3 – Site Allocation – land at Viceroy Coaches, to rear of 10-12 Bridge Street</b></p> <p>The context of this site being subject of an emerging site allocation in the emerging Local Plan is not clear. We suggest that an explanation in paragraph 4.1.10 that a site referred to as Land at Viceroy Gardens to rear of 10 – 12 Bridge street is currently allocated for development for 10 dwellings and that the NP policy seeks to provide some additional criteria to that.</p> <p>The supporting text in paragraph 4.1.10 should also provide a brief description of the site, explaining what Bridge End Garden is and explain concerns regarding impact of development on Bridge End Garden. As a whole, the supporting text should be providing a rationale for the criteria being provided in the policy.</p> <p>Since this is a site allocation a map of the site indicating the various requirements is needed.</p>	
<b>Action Proposed</b>	
<p>Improve supporting text as suggested <input checked="" type="checkbox"/></p>	

### 3-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>Having considered the contents of the Neighbourhood Plan I wish to make the following comments on behalf of F C Moore limited being the owner of the site shown as Policy SWF3 ;</p> <ul style="list-style-type: none"> <li>• POLICY SWF3 SITE ALLOCATION – LAND AT VICEROY COACHES , TO REAR OF 10-12 BRIDGE STREET</li> </ul> <p><i>The SWNP supports the Local Plan allocation of SAF3 but requires the following criteria to be met :</i></p> <p><i>c ) The retention or replacement in sympathetic materials of the brick walls of the existing buildings to a height of 2.4m between the site and Bridge End Garden ;</i></p> <p>OBJECTION ; It is considered that the wording of part c ) of the policy is overly prescriptive in requiring a specific height of 2.4m. This makes no allowance for possible variation in</p>	

height to suit the design of the boundary treatment and as to whether it were to be incorporated within the structure of any proposed dwelling and /or ancillary building. The height of any such boundary wall will best be determined following both a structural and measured survey of these existing boundary walls and following having been the subject of consultation and a prior approved Development Brief ( as part b ) of this same NP policy.

It is therefore requested that part c ) be amended so as to allow for greater flexibility of design in this matter and to read ;

*C ) The retention or replacement in sympathetic materials of the brick walls of the existing buildings between the site and Bridge End Gardens to such height as is agreed within a prior approved Development Brief .*

- POLICY SW8 PARKING ON NEW DEVELOPMENTS

1. *All new developments must provide for parking spaces for residents and visitors as per the Essex Works publication Parking Standards Design and Good practice September 2009 or later equivalent.*

The Essex Works Publication contains various Information notes and including reference to *Reductions of the vehicle standard may be considered if there is development within an urban area ( including town centre locations ) that has good links to sustainable transport ( See Parking standards in Urban Areas section )*.

Furthermore the potential for the reduction in car parking and travel by car within sustainable town locations is supported by part 102 of the National Planning Policy Framework 2019 which states inter alia ;

*102 . Transport issues should be considered from the earliest stages of plan making and development proposals , so that ;*

*c) opportunities to promote walking , cycling and public transport use are identified and pursued :*

*d ) the environmental impacts of traffic and transport infrastructure can be identified and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects , and for net environmental gains :*

*103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable , through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision –making.*

OBJECTION ; It is considered that for clarification and to allow for a reduction in the level of parking provided within suitable sustainable locations, the proposed wording of part 1 of Policy SW8 should add the following ; *Reductions of the level of parking required may be considered for development within an urban area ( including town centre locations ) that has good links to sustainable transport.*

- POLICY SW19 ECOLOGICAL REQUIREMENTS FOR ALL NEW DOMESTIC AND COMMERCIAL DEVELOPMENTS

1. *All new development proposals must contain at least 50% green surface space as described in the TCPA guidelines. This can be achieved by including :*

- *Planting of wildlife friendly specimen trees ;*
- *Incorporating wildlife corridors such as hedgerows or ponds through a site;*
- *Private gardens ( where the development includes dwellings ) ;*
- *Public open space ( which must as a minimum meet the requirements in policy SW27 ); and*
- *Green roofs*

OBJECTION ; It is considered that the wording of the policy requiring at least 50% level of green surface space is overly prescriptive and makes no allowance for a reduction in the this level having taken into account such factors as ( a ) the commercial viability of the redevelopment of brownfield sites, ( b ) the need to achieve Local Plan densities, ( c ) the need to make effective use of land in sustainable locations ( NPPF Part 11 ) , ( d ) sites which already lie within close proximity to neighbouring green spaces such as publicly accessible Historic Gardens and ( e ) sites which provide other significant environmental benefits through their redevelopment such as land remediation and de-contamination providing benefit to the local community .

Furthermore the Environment Bill proposes a new duty for development sites to deliver a 10% net biodiversity gain in new schemes albeit with a potential specific exemption for certain brownfield sites ( to be defined more clearly within secondary legislation ).

OBJECTION : It is proposed that the wording of the first sentence only of part 1 of Policy SW19 be amended to ;

1. *All new developments must seek to contain green surface space as described within the TCPA guidelines . This can be achieved by including ;*

- POLICY SW27 OPEN SPACE FOR INFORMAL RECREATION

1.*All new residential developments must provide 7.61ha per 1000 people for informal recreation .*

2.*All new residential developments must provide a new play area. The design, creation and the location of play areas on developments will be agreed with the Town Council at*

*reserved matters stage. They must be in locations central to the development , well overlooked and built in durable materials .*

OBJECTION ;

It is considered that this requirement for open space to apply to *All new residential developments will be* too onerous for minor development schemes of 1 – 9 dwellings and does not take into account the available land area and viability and in particular to that of brownfield sites burdened with significant land contamination remediation costs but able as such to provide significant environmental and ecological benefits for the community at the landowner's expense .

Ecological benefits .

Policy 8 Infrastructure ( Open Space Requirements ) of the Uttlesford District Council Regulation 19 Local Plan sets thresholds for the provision of on-site provision of Amenity Green Space, for the Provision for children and young people and for Allotments to apply to all development of 10 dwellings or over

As such it is proposed that the wording of both parts of 1. and 2. of the Neighbourhood Plan Policy SW27 be re-worded in respect of On Site provision of Open Space to only apply to Major Development housing schemes as defined within the National Planning Policy Framework 2019 i.e. to schemes of 10 or more dwellings or for sites with an area of 0.5 hectare or more.

I trust that the above objections are clear and will be fully considered within the Saffron Walden Neighbourhood Plan review.

Yours faithfully

██████████ ( p.p F C Moore Limited, 10-12 Bridge Street, Saffron Walden CB10 1BU )

**Action Proposed**

1) As the site is in a Conservation Area, only a full application may be made. Therefore there is an opportunity for the stipulations in the policy to be more flexible, so long as BEG continues to have the same level of screening as before, which was the purpose of the policy (as recommended by Landscape Architect for BEG).

2) While the site is in an urban location, it does not follow that the public transport is sufficient to make it a given that residents will not have cars. It is to be expected that future residents will in fact have cars. However, given that the site is in close proximity to Swan Meadow Car Park, for which annual parking permits are available, it should be possible to reduce the parking standard for this site without causing detrimental fly parking in the neighbourhood. However this may happen to some extent, with Freshwell Street and environs being the likely location

for fly parking. This will cause the residents of Freshwell Street to request that the council install a residents' parking scheme.

So the policy could be amended to allow for reduced parking quantum on the site, so long as the developer pays for the implementation of a residents' only parking scheme on

Freshwell Street (and possibly immediate environs).

3) No change to green space – this can be green roofs or tree canopy for example so does not need to impact on the footprint of the site or possible densities.

4) It is accepted that the site would not be large enough to provide for a play area, so in this case a commuted sum for local locations would be appropriate, for example towards equipment upgrades at BEG, which is likely to be used as the 'playground' for the

development. Policy to be amended to reflect this.

## SW4 Housing mix on new developments

### 4-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policy SW4 Housing Mix on New Developments</b></p> <p>How is 10% requirement for 1 bedrooms in <b>market</b> developments of 10 or more homes supported by the information provided in the supporting text?</p> <p>It is not clear why the SWNP proposes a restriction of “up to 10% 1 bedroom homes” in Point 1 when paragraph 4.3.4 states that there is a shortage of smaller properties and Table 15 (page 34) shows a requirement of 12.2% for such properties. We suggest to use the wording as for the other groups i.e. “At least 10% 1- bedroom homes”.</p>	
<b>Action Proposed</b>	
<p>The supporting text is meant to demonstrate that many people are obliged to seek social housing if they need a 1 bedroom property, because the open market is not providing (enough) one bedroom properties. i.e just because the open market finds it more profitable to deliver bigger properties, this does not mean that there is low/no demand for open market one bedroom properties.</p> <p>In a classic economic model, there would be no barriers to supply and therefore the open market would provide all products which buyers want to buy. The housing market is different to the classic economic model in that there is a ‘raw material’ barrier to supply – namely the availability of land and planning permission to build upon it. Therefore we consider that the lack of supply of open market one bedroom properties is something which can only be addressed by policy, and that it is desirable to address it with policy. We consider it desirable to address it with policy because forcing people to seek social housing when they don’t necessarily need it is an unnecessary cost to the public sector, which diverts resources away from either other people in need of social housing, or from other public sector services.</p> <p>Proposed action is to:</p> <p>1) Review and amend as required the supporting text; and <input checked="" type="checkbox"/></p> <p>2) Reword the policy. <input checked="" type="checkbox"/></p>	

### 4-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
<p>SW4. Housing Mix.</p> <p>The proposed size mix is much more appropriate than that delivered in recent years. However, it is our view that the proportion of smaller homes should be increased further in order to align existing and new supply with local requirements. Homes suitable for multi-generational living should be part of the overall provision. The lack of sufficient</p>	

smaller and less costly homes has led to an outflow, often reluctant, of younger people and families to cheaper places.

**Action Proposed**

None required

**4-3**

**Contact Details**

[REDACTED]

**Organisation**

Gladman

**Comment**

In principle, Gladman support the general thrust of this policy which seeks to provide a mix of housing types. However, it is currently unclear how the proposed housing mix, which seeks to support a high percentage of homes for the elderly and starter homes of 2-3 bed or smaller has been derived. As such, there is no robust and proportionate evidence to support this policy requirement as required by the PPG. In this regard, housing mix will inevitably change over a period of time and this policy should instead seek to secure a greater degree of flexibility going forward. Gladman suggest that this issue is discussed with the Council's housing team to ensure that they align with the Council's housing mix and tenure preferences. As housing needs can change over time, there is also a real risk that this policy will become outdated as new evidence of local need comes to light and the neighbourhood plan should contain suitable measures (i.e. if up-to-date evidence is provided) so that it can respond positively to changes in circumstance which may arise over the plan period.

**Action Proposed**

It is entirely clear that the proposed housing mix has been derived from research carried out for the SWNP. No change to policy.

**4-4**

**Contact Details**

[REDACTED]

**Organisation**

[REDACTED]

**Comment**

Any plans for small bungalows?

**Action Proposed**

No change – affordable housing is mandated by UDC and already includes bungalows. Bungalows are useful but not the most efficient use of greenfield land. A 2 storey building of flats would for instance house double the number of households housed on the same footprint, reducing urban sprawl.

**4-5**

**Contact Details**

[REDACTED]

**Organisation**

[REDACTED]

**Comment**

[REDACTED]

I agree with this mix for new developments. Saffron Walden is an affluent town and developers would, I am sure to maximise their profits, focus solely on larger properties. This mix appears to meet the need. I would only add that the social housing with is clearly much needed should be spread around on developments rather than built in clusters.	
<b>Action Proposed</b>	
No action required.	

#### 4-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	<p><b>Chapter 4: Future housing need in Saffron Walden (Page 19 to 38)</b>  <i>Agree with content plus: -  Scouting believes it would to both to its and the community's benefit if a <b>SW policy</b> was developed to ensure that consent to build came with a requirement to include suitable cost-effective, safe and secure, community buildings which can be used for Scouting purposes. These must be constructed ahead of any new house building to ensure that post development issues don't arise which stop these new buildings being built / completed. – noting item, 1 (Page 25) .....mitigation of adverse effects on the community.....</i></p>
<b>Action Proposed</b>	
No action required	

## SW5 Affordable housing

### 5-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
Point 2 – current wording requires 1 and 2 bedrooms to be included in flatted development. Further clarity on the acceptability of 100% 1 bed scheme should be considered`.	
<b>Action Proposed</b>	
Amend wording of policy so that community-led / not for profit development is allowed flexibility to build whatever is required to meet its identified need. <input checked="" type="checkbox"/>	

### 5-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
Policy SW5 point 5 I agree with this objective but I am not sure how you aim to achieve it. A developer could come in and might build in stages or perhaps sell on some of the site to another builder and it would be hard to enforce this policy I think, however laudable. Who would rule on whether the site had been artificially divided and how would you enforce this ? I am not sure the Town Council has cash to pay for large legal fees taking developers to court.	
<b>Action Proposed</b>	
None. The provision made in this policy is a standard method of closing a known loophole. Implementation of the policy is a separate issue not related to policy making.	

### 5-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
Welcome objective and recognition that affordable rents should be at 20% below market values.	
<b>Action Proposed</b>	
Comment supportive of policy – no action required.	

### 5-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>The pre-amble seems to suggest that affordable housing is a matter of semantics, ie if it is defined as affordable housing, then it can only be at 20% less than market rate. So why not encourage / give priority to social housing. Why should development only be encouraged if it makes a profit. High rents create poverty. Saffron Walden should have a policy of reducing poverty. In addition to social housing/ council housing, alternative forms of ownership should be encouraged eg co-operative housing, and community supported self-build.</p> <p>Councils should also be more robust in standing up to central government policies, such as the sale of council houses, and the way income is siphoned off from the UDC housing revenue account. All councils should report to their residents on the way government policies force up the price of housing, while subsidising private profiteering.</p> <p>I support the establishment of Community Land Trusts, but probably this kind of action could go further with public interest companies or building co-operatives undertaking construction. The Council should work with the UC to encourage the formation of such construction bodies.</p>	
<b>Action Proposed</b>	
<p>The SWNP aims to tilt the balance away from all housing being for-profit and towards a greater share of new housing being not-for-profit. This concept is being challenged by respondents and further work needs to be done to establish what is and what isn't possible from a legal perspective.</p>	

## 5-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policy SW5 Affordable Housing</b></p> <p>The intention in <b>Point 4</b> regarding community land trusts is appreciated but in our opinion this does not fall within the scope of planning to state who the delivery partner should be with regards to affordable housing</p>	
<b>Action Proposed</b>	
<p>If not to planning, to whom does it fall? The provider and provision is negotiated as part of the S106 and is therefore a part of the development management process.</p>	

## 5-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	

**Point 8** This is inappropriate for a Neighbourhood Plan to decide on levying a CIL. Please see PPG Ref ID 25-065020190901.

**Action Proposed**

Noted, remove policy SW5 Point 8.

5-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
General objectives are fully supported, though again a higher proportion of affordable units to be one, two and three bedrooms.	
<b>Action Proposed</b>	
None required	

5-8

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I welcome this policy and compared with Braintree district where I have recently moved from, 40% affordable housing is generous. I do think it is important however, to ensure that developers conform to your point 3. I am not convinced that this happens in practice. (See Mortimers Gate development, opposite Ridgeons, where most of the affordable housing surrounds the electricity sub-station.) Although, I acknowledge there may well be good reason why the above housing all appears to be managed by Housing Associations rather than the Council, I would like to make the point that these rents are considerably higher than council rents and there are many families who struggle to pay them at the higher rate.	
<b>Action Proposed</b>	
None required	

## SW6 Housing density

### 6-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
Blanket 40dph is too prescriptive. The Plan should support the case for higher densities / greater flexibility where i) sites are well located to town centre / local services ii) have limited car parking iii) make a significant contribution to providing smaller unit sizes in accordance with local needs (i.e. 1 / 2 bed units)	
<b>Action Proposed</b>	
Review policy wording with regard to 'Almshouse-type' sites where there is a good argument for flexibility. See Statutory Consultee responses to previous Almshouse planning application UTT/18/3407/FUL (withdrawn) <input checked="" type="checkbox"/>	

### 6-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	[REDACTED]
<b>Comment</b>	
I am in complete agreement with this. Crabtrees is a nightmare, claustrophobic and impossible to navigate around in a car. The lower the density, the better, for the wellbeing and mental health of the residents.	
<b>Action Proposed</b>	
No action required.	

### 6-3

<b>Contact Details</b>	[REDACTED], Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<u>Housing Density and Car Ownership</u> – ECC notes that the Plan states “car ownership levels which are necessary in Saffron Walden cannot be supported by high densities” (Page 38, Paragraph 4.4.3). ECC acknowledges the car ownership levels within Uttlesford District are high. The climate change and environmental agenda will also encourage district residents, workers and investors to adopt changing travel behaviour, emerging policy should reflect and support this change.	
<b>Action Proposed</b>	
None	

None.

The SWNP encourages travel planning and a range of measures to improve public transport and take up of walking and cycling. However, ECC is responsible for the actual implementation of these measures.

Unless / until ECC puts these measures in place, so that car ownership might realistically be expected to fall, Saffron Walden must continue to plan for current levels of car ownership.

The ball is in ECC's court, for the SWNP to plan for reduced car ownership without any evidence that this is likely to happen, would be naïve.

## SW7 Design

### 7-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Chelmsford District Council
<b>Comment</b>	
At 5.1.5 please note that a new version of the Essex Design Guide was launched in 2018.	
<b>Action Proposed</b>	
Update text <input checked="" type="checkbox"/>	

### 7-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Chelmsford District Council
<b>Comment</b>	
At 10.2.8 please note that a new version of the Secured by Design – New Homes was launched in March 2019.	
<b>Action Proposed</b>	
Update text <input checked="" type="checkbox"/>	

### 7-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Paragraph 5.1.5</b> - The Essex Design Guide was completely re-written and published in 2018. Suggest any references to the EDG should be updated to reflect the 2018 edition rather than the now outdated previous versions.	
<b>Action Proposed</b>	
Update text <input checked="" type="checkbox"/>	

### 7-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Paragraph 5.2.8-</b> A stronger statement is suggested to highlight the local distinctiveness of the Saffron Walden parish (also distinctive elements that are different between the built environments of Saffron Walden, Audley End, Little Walden and connecting countryside. Local distinctiveness includes things like the palette of materials (timber frame, render, red Essex brick etc.), roof orientation and pitch, how properties sit in their plots, scale, windows	

<b>Action Proposed</b>	
Improve text <input checked="" type="checkbox"/>	

#### 7-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
Point 1. (or as a separate heritage design policy) should concentrate on how development proposals will be expected to preserve and enhance Saffron Walden parish's distinctive character – maintaining and promoting the distinctive vernacular architectural heritage, contribute positively to the street scene by the use of complementing materials and by ensuring that height and scale that is in keeping with the neighbouring properties, ensure setting is in keeping with the locality and that boundary treatments (original walls, hedges and trees should be retained where possible)	
<b>Action Proposed</b>	
Improve text <input checked="" type="checkbox"/>	

#### 7-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
Point 5 Use of the phrase “high levels” is ambiguous and not very clear when determining an application. What is the measurement of high level in this context? Suggest “high level” is removed from the policy wording.	
<b>Action Proposed</b>	
Clarify text <input checked="" type="checkbox"/>	

#### 7-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
Point 8. Development sites of ‘more than 30 dwellings, or any development in a Conservation Area, or in a sensitive setting, will be subject to an independent design review’. How will this work?	
<b>Action Proposed</b>	
Clarify text – we have in the past asked UDC how design reviews work and no response has been forthcoming. <input checked="" type="checkbox"/>	

## 7-8

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	Point 13. Street furniture - suggest a more focused approach The Saffron Walden Conservation Area Appraisal UDC 2018 noted a number of instances of the poor installation of street furniture e.g. 20mph highway signs at the junction of Castle Street and Bridge Street. Improvement to existing environment should be noted e.g. road markings and signs should be provided in a less obtrusive fashion and more in tune with the surrounding streetscape Design guidance can be found in the Historic England 'Streets for All' and further ideas can be found in the Saffron Walden Public Realm Strategy 2006.
<b>Action Proposed</b>	
Improve text (but note that ECC is unlikely to consult with SWTC or NP in the design or placing of these.)	<input checked="" type="checkbox"/>

## 7-9

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	<b>Point 14</b> Article 4 Direction, it is not a matter for planning policy and nor can a planning policy anticipate a future potential situation in which an Article 4 Direction is introduced during the Plan period. This would not provide the clarity required of the Plan's policies. If an Article 4 Direction is introduced at some future stage then this is a matter that could be addressed through a modification to the Plan.
<b>Action Proposed</b>	
Clarify text	<input checked="" type="checkbox"/>

## 7-10

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	Policy SW7 needs a reference for development to take account of flooding/water quality impacts. Suggest addition of the emerging Local Plan modifications agreed with the Environment Agency (for Policy EN 10) as follows: <i>"Minimising Flood Risk: Development proposals will comply with flood risk assessments and management requirements set out in the National Planning Framework and Planning Practice Guidance and the Uttlesford Strategic Risk Assessment to address current and future flood risks from all relevant sources with appropriate climate change allowances. All new development proposals will need to demonstrate that adequate foul water treatment and disposal exists or can be provided in time to serve the development."</i>

<b>Action Proposed</b>	
Clarify text <input checked="" type="checkbox"/>	

## 7-11

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Gladman
<b>Comment</b>	
<p>The above policy sets out a range of design principles which development proposals should seek to meet. While the government has shown support for development to incorporate good design principles, Gladman would note that the Framework also states:</p> <p>‘To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.’<sup>4</sup> (NPPF – Paragraph 126)</p> <p>Whilst Gladman recognise the importance of high-quality design, in accordance with the requirements of the Framework above, design policies should not aim to be overly prescriptive and require some flexibility in order for schemes to respond to site specifics and the character of the local area. In essence. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.</p> <p>It is acknowledged that the policy seeks to encourage applications to be in accordance with Building for Life 12 and nationally described space standards. These elements are considered more of an aspiration of the policy and should there not be referred to in the policy wording itself. Furthermore, it is not appropriate for the Steering Group to seek to implement the use of NDSS. Gladman take this opportunity to inform the Steering Group that the Written Ministerial Statement (2015) makes clear that technical standards relating to the construction, internal layout or performance of new dwellings can only be progressed through a Local Plan based on up-to-date evidence of need and viability and specifically states that these standards should not be progressed through neighbourhood plans. Reference to NDSS should therefore be removed from the policy wording and supporting text.</p> <p>Lastly, it is noted that the policy states ‘planning permission will not be granted for development of a poor design that does not respond to the opportunities for improving local character and quality.’ Gladman remind the Qualifying Body that it is not in the remit of the neighbourhood plan to determine planning applications as this is the sole responsibility of the local planning authority and recommend that this element of the policy is deleted or amended to state that development of a poor design will not be supported.</p>	
<b>Action Proposed</b>	

There is no justification to remove references to NDSS from supporting text. This is a perfectly reasonable aspiration for a community to have for its residents.

The amendment as suggested in the final paragraph is a reasonable request.

## 7-12

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Sport England
<b>Comment</b>	
<b>Policy SW7: Design</b>	
<p>While criterion 4(e) of the policy which requires developments to demonstrate that they will create well connected and accessible new streets is welcomed, it is requested that the policy and reasoned justification make explicit reference to designing developments to encourage physical activity. In this regard, developments should be expected to accord with the principles in Sport England &amp; Public Health England's Active Design guidance which provides detailed advice on how this can be achieved e.g. multi-functional open space, walkable communities, co-located facilities etc. Further detail is on our website at <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a>. In addition, the Essex Design Guide (2018 update) which has been referenced in the plan has also embedded Active Design principles into its guidance.</p>	
<b>Action Proposed</b>	
Add this in as per suggestion.	<input checked="" type="checkbox"/>

## 7-13

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>I am in complete agreement with this policy and all the points made are excellent and valid. I have personal experience of the lack of vision in respect of Tudor Parks with regard to transport and lack of pedestrian access and have clambered over grass verges and through hedgerows to find a way through to Tescos, only to find there is none. What missed opportunities!</p> <p>I would ask however, if all these points are realistic and enforceable with regard to planning law, since many of the most recent developments do not seem to comply. For example, and I know it is a matter of taste but the assisted living flats (still empty after all this time) opposite Tescos, Cornell Court are truly ugly and simply do not blend in with the historic architecture and market town nature of Saffron Walden. This also applies to the flats and retail complex along Thaxted Road, on the corner of Shire Hill.</p>	

<b>Action Proposed</b>	
None required	

7-14

<b>Contact Details</b>	██████████, Principal Planning Officer (Spatial Planning) ██████████
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>Policy SW7- Design (page 44)</u> – ECC recommends that the following provisions be included within the policy wording –</p> <p><i>“New development should be –</i></p> <ul style="list-style-type: none"> <li>○ <i>in accordance with para 163 and 165 of the NPPF;</i></li> <li>○ <i>accompanied by site specific flood risk assessment, where appropriate;</i></li> <li>○ <i>Major developments should incorporate sustainable drainage systems; and</i></li> <li>○ <i>Provide multifunctional space to enhance landscape strategy comprising green infrastructure.</i></li> </ul> <p>- <i>Any proposed developments should consider the use of Environment Agency updated climate change allowance (February 2016) and the potential increased risk of surface water flooding, so that the necessary measures to reduce any risk of flooding to properties, residents and wildlife.</i></p> <p>- <i>Surface water discharge from the development should accord with SuDS hierarchy, ground investigation should be undertaken to provide evidence of onsite infiltration, if this is not possible, surface water could be discharged into watercourse, or if it is not feasible a sewer, with appropriate attenuation and treatment to mitigate any risks of flood and pollution.</i></p> <p><i>Preference should be given to above ground features such as basins, ponds and swales, green roofs, rain gardens and should consider the use of multi-functional space to promote biodiversity and amenity values and the management of surface water runoff generated from heavy rainfall events and minimize the risk of surface water flooding. Attenuation by underground tanks have no water quality, amenity and biodiversity benefits and therefore should be considered as last resort”.</i></p>	
<b>Action Proposed</b>	
Amend policy as suggested.	<input checked="" type="checkbox"/>

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<p><b>Chapter 5: Town layout and design (Page 39 to 54)</b>  <i>Agree with content plus: -</i>  5.1.1 <i>Scouting demand for the 21<sup>st</sup> century require quality-built accommodation which is cost effective, safe and secure with all modern amenities – broadband / communications / sanitary etc meeting current national standards.</i>  5.2.13 <i>Scouting agrees that there is a lack of parks / open spaces for general use. There is also a danger that any currently available may be consumed by “in-fill” developments without any suitable new ones being made available.</i>  <i>Scouting agrees with Policy SW8 Parking (Page 48) - any new building for the use of Scouting needs to consider the available space to allow for suitable car parking.</i></p>	
<b>Action Proposed</b>	
None required.	

## SW9 Energy efficient and sustainable design

### 9-1

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ██
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<u>Policy SW9 – Energy Efficient and Sustainable Design</u> – ECC supports the policy provision bullet 3 which demonstrates a requirement to re-use and recycle material arising through demolition and refurbishment on-site wherever possible.	
<b>Action Proposed</b>	
No action required.	

## SW8 Parking on new developments

### 8-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
These parking standards should not be applied universally. The Plan needs to provide greater flexibility for town centre locations where there is good access to services / car demand can be demonstrated to be low.	
<b>Action Proposed</b>	
Review policy wording with regard to 'Almshouse-type' sites where there is a good argument for flexibility. See Statutory Consultee responses to previous Almshouse planning application UTT/18/3407/FUL (withdrawn) <input checked="" type="checkbox"/>	

### 8-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
<p>SW8. Parking</p> <p>Car parking on the south or east sides of town centre is non-existent or inadequate. As a result, many vehicles are driven through the town centre at least twice (outward and return) to get to a space in Elm Grove, The Common or Swan Meadow. Additional parking and or a park &amp; ride service on the east would make those traffic movements unnecessary. Installing real time parking availability displays on the main routes into the town would significantly reduce them.</p> <p>Introducing a park and ride bus route serving the town centre, Audley End House / Railway, Audley End Station and County High should be considered.</p> <p>Car share clubs should be mandated on new developments.</p> <p>Free parking with Electric Vehicle (EV) charging should be increased to encourage take up of zero emission vehicles</p> <p>Requirement for EV charging points on commercial development should be very much higher, say 25- 30%. Again, this will encourage take up, and could attract people to Saffron Walden if provision is better than other towns.</p> <p>Could the Town Council encourage the provision of EV charging at Audley End Station?</p>	
<b>Action Proposed</b>	
<p>Public transport is the remit of ECC – no action possible here.</p> <p>Car parking charges are the remit of UDC – no action possible here.</p> <p>AE station is in Wendens Ambo – outside the remit of SWNP area.</p>	

8-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I am in agreement with every point in this policy. I live on a new Bloor Homes estate which has sufficient parking and although some is tandem parking which has encouraged some people to park on street. it works well on the whole. This is in contrast with older areas where pavement parking has become a real problem.	
<b>Action Proposed</b>	
No action required.	

8-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I would recommend a minimum standard of charging points (7kWh). Otherwise developers might install the cheapest options which will take a whole day to charge a vehicle.	
<b>Action Proposed</b>	
Adopt this recommendation <input checked="" type="checkbox"/>	

## SW9 Energy efficient and sustainable design

### 9-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Anglian Water
<b>Comment</b>	
<p>The inclusion of higher water efficiency within new homes would reduce the foul flows entering the foul sewerage network and reduce the impact on existing infrastructure. Therefore Anglian Water would support the adoption of the standard in the Uttlesford administrative area as referred to in the plan subject to any further changes to existing national building standards. The only comment we would make is that this water efficiency standard is normally applied to residential developments rather than commercial developments. Therefore we would suggest referring to a suitable alternative.</p> <p>My understanding is that a BREEAM standard is normally used for commercial buildings including water use. Although I would seek further advice from the District Council on to what extent the neighbourhood plan can specify water efficiency standards and how these would relate to the emerging Local Plan.</p>	
<b>Action Proposed</b>	
<p>05.02.20 Have emailed the respondent to ask for suitable wording, or to point us to another NP which might have better wording. Response received as requested on 05.02.20 – suggested wording below:</p> <p>Point 11: Anglian Water as sewerage company for the Parish supports the requirement for new development proposals to include water re-use and recycling including rainwater harvesting. Reference could also be made to surface water/storm water harvesting in this policy which capture surface water runoff in a storage tank or pond. The water can be treated if required, then supplied to properties through a dedicated pipe network. These systems can also be combined with Sustainable Drainage Systems (SuDS). Suggested wording: '11. Water reuse and recycling and, rainwater harvesting and surface water harvesting should also be incorporated wherever feasible to reduce demand on mains water supply.'</p> <p>[REDACTED] <input checked="" type="checkbox"/></p>	

### 9-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I commend and support these environmental policies	
<b>Action Proposed</b>	

Supportive of policy – no action required.

### 9-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policy SW9 Energy Efficient and Sustainable Design</b> This policy would not meet the basic conditions as currently written. Neighbourhood plans are not able to impose standards relating to internal layout and energy efficiencies of dwellings. <a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a> Once revised the policy could incorporate the Environment Agency comment on emerging Local Plan D8 to read, “Developments should embed Waste, recycling and storage areas into and integral part of their design. Equally, systems that reduce water consumption and allow for re-use of grey water is encouraged. Developers will be required to design and deliver effective surface water drainage systems in accordance with the Lead Flood Authority guidance with a requirement of not increasing flood risk on or off site.	
<b>Action Proposed</b>	
Consider rewording to meet basic condition without losing effect. <input checked="" type="checkbox"/>	

### 9-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<b>Policy SW9 Energy Efficient and Sustainable Design</b> It is so much easier and cost effective to include energy efficiency measures in buildings from the start rather than retrofitting. In so far as SWTC has the ability to impact planning, it should try and push for best practice.  SW has plenty of old and inefficient buildings, which present more of a challenge. This could be an opportunity though as inefficient buildings are a UK wide issue, but many solutions do now exist, so can we become a trailblazer here? This would probably require a change in attitude with respect to old buildings, and some joined up thinking between the council, community and private sector.	
<b>Action Proposed</b>	
SWNP unable to mandate retrofitting of existing buildings. – no action possible	

### 9-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	

SW9 Energy Efficient and Sustainable Design.  
Supported.

**Action Proposed**

No action required.

9-6

**Contact Details**

**Organisation**

**Comment**

I feel quite passionately about energy efficiency and sustainability and support this policy wholeheartedly. With climate change must come good policies and practices supported by all councils and organisations.

I was very disappointed when moving into my new-build that there were no solar panels and alternate methods of central heating to gas. I do appreciate however that central government must take the lead on this.

**Action Proposed**

No action required

9-7

**Contact Details**

**Organisation**

**Comment**

Perhaps there should be a design standard that all gas boilers should be mounted in a position that can easily be replaced by a heat-pump e.g. on an external wall with space outside for the heat pump?

**Action Proposed**

This will likely be superseded by the Future Homes Standard. No action required

## SW10 Accessible and adaptable homes

### 10-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	<b>Policy SW10 Accessible and Adaptable Homes</b> Some aspects of this policy may not be appropriate having regard to the March 2015 ministerial statement referenced in comment on Policy SWP17.above.
<b>Action Proposed</b>	
No action required	

### 10-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	SW10. Accessible and Adaptable homes Supported.
<b>Action Proposed</b>	
No action required	

### 10-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	In agreement with all of this.
<b>Action Proposed</b>	
No action required.	

## SW 11 Town centre uses

### 11-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Paragraph 6.3.1</b> this paragraph should reference available data that justifies the definition of the primary frontage and secondary frontages.</p> <p>Page 3 of Appendix 8 of the Uttlesford Retail Study Update 2018</p> <p><a href="https://www.uttlesford.gov.uk/media/8151/Uttlesford-Retail-Study-Update-Appendix-8-Main-Town-Centre-Use-Class-Maps-May-2018-/pdf/Appendix%207i%20-%20Uttlesford%20Retail%20Study%20Update%202018%20App%208%20Main%20Town%20Centre%20Use%20Class%20Maps1.pdf">https://www.uttlesford.gov.uk/media/8151/Uttlesford-Retail-Study-Update-Appendix-8-Main-Town-Centre-Use-Class-Maps-May-2018-/pdf/Appendix 7i - Uttlesford Retail Study Update 2018 App 8 Main Town Centre Use Class Maps1.pdf</a></p>	
<b>Action Proposed</b>	
Improve text	<input checked="" type="checkbox"/>

### 11-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policy SW11 Town Centre Uses</b></p> <p>Change of use of the ground floor from A1 to NPPF-defined main town centre uses or to other non town centre uses will only be permitted....</p> <p>To reflect your intention but also to meet basic conditions and avoid unintended consequences I think your point 5 should be qualified with some criteria including</p> <ul style="list-style-type: none"> <li>- Not undermining the viability or vitality of Saffron Walden Town Centre</li> <li>- Being located and design so as to encourage access by sustainable modes</li> <li>- Not exacerbating through traffic movements.</li> </ul> <p>The above points are probably addressed better through standalone policy? Should the design criteria set out in point 6 not apply to all proposals rather than just specific to hotel development? What is the relationship between point 6 and point 2 and 3? Do 2 and 3 apply to point 6? be a bit more restrictive?</p>	
<b>Action Proposed</b>	
Improve text	
NB superseded by Gov'ts change to planning use classes	

### 11-3

<b>Contact Details</b>	[REDACTED]
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<b>Organisation</b>	SS Planning on behalf of Kentucky Fried Chicken
<b>Comment</b>	
<p><b>Policy SW11 Town Centre Uses</b></p> <p>Whilst we support the policy generally, we are concerned that part 8 focusses solely on the amenity and public health impacts of hot food takeaways. Recent research (Robinson et al., 2018) shows that "full service restaurants" offer significantly more excessively calorific main meals, fewer main meals meeting public health recommendations, and on average 268 calories more in main meals than "fast food restaurants". Whilst these categories do not align with use classes, they demonstrate that public health is an issue to be addressed across all food and drink uses (Classes A3, A4 and A5) as well as some shop uses (Class A1) - for example, coffee shops, sandwich shops and bakeries that serve "food to go".</p> <p>References Robinson, E., Jones, A., Whitelock, V., Mead, B.R., Haynes, A. (2018) (Over)eating out at major UK restaurant chains: observational study of energy content of main meals /British Medical Journal/ (363) 4982</p>	
<b>Action Proposed</b>	
No change to policy -the policy is as much about litter and traffic more than just calorific content, although the respondent makes a valid point on this latter point. NB superseded by Gov'ts change to planning use classes	

#### 11-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
<p>SW11. Town Centre Uses.</p> <p>In general, this policy is supported. Using vacant town centre units to provide pop up facilities (similar to those in the Grafton Centre) would provide safer spaces for young people to meet after school and evening, and increase the evening footfall.</p>	
<b>Action Proposed</b>	
<p>Add an additional policy as proposed.</p> <p>While Policy SW11 Town centre uses would support the change of use from a vacant shop to a pop up facility, there is no harm in adding an additional policy for certainty. The supporting text is supportive of any measures which serve to increase the interest of the town centre, and an arts centre would do this.</p> <p>Improve text <input checked="" type="checkbox"/></p>	

#### 11-5

<b>Contact Details</b>	planning@theatrust.org.uk
<b>Organisation</b>	Theatres Trust

<b>Comment</b>	
<p>We are supportive of this policy, in particular that it incorporates the 'Agent of Change' principle. We would suggest it may be appropriate for this policy to promote the temporary use of vacant units (in particular A1) for alternative uses such as for the arts and culture to help activate units and spaces pending longer-term occupation.</p> <p>Add an additional policy as proposed.</p> <p>While Policy SW11 Town centre uses would support the change of use from a vacant shop to an arts centre, there is no harm in adding an additional policy for certainty. The supporting text is supportive of any measures which serve to increase the interest of the town centre, and an arts centre would do this.</p>	
<b>Action Proposed</b>	
<p>Add an additional policy as proposed.</p> <p>While Policy SW11 Town centre uses would support the change of use from a vacant shop to an arts centre, there is no harm in adding an additional policy for certainty. The supporting text is supportive of any measures which serve to increase the interest of the town centre, and an arts centre would do this.</p> <p><input checked="" type="checkbox"/></p>	

#### 11-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>1) Preservation of the shopping in the town centre. This is something that makes Saffron Walden an attractive place to live. This could be protected by continuing good access to the town centre including by car, and protection of retail spaces as such (i.e. not allowing conversion to residential properties).</p>	
<b>Action Proposed</b>	
<p>No change. The NPPF town centre uses policy precludes conversion to housing. The need for car parking spaces is always under consideration, with Blue Badge holders as a priority. This is balanced against the amenity of the town centre for pedestrians.</p> <p>NB: superseded by changes to PDRs</p>	

#### 11-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>I support this policy and am very keen for Saffron Walden's town centre to retain its character and vibrancy rather than to become solely a place full of restaurants and charity shops. I am also keen to ensure that new developments such as Knights Park do not kill off businesses in the town centre and are built in keeping with the historic nature of the</p>	

town and are not ugly carbuncles appended to the town, completely ruining the landscapes.

**Action Proposed**

No action required

**11-8**

**Contact Details**

[REDACTED]  
[REDACTED]

**Organisation**

Saffron Walden Scout District

**Comment**

**Chapter 6: Commercial premises (Page 55 to 70)**

Agree with content plus: -

Page 66: - *Scouting supports the eLP Policy SAF14 with the proviso that a new HQ building would have to be provided prior to vacating the current premises (part of the 56 high Street package).as follows: -*

*6.5.5 56 High Street, referenced in eLP Policy SAF14, currently has the Scout Hall on the site. Development of this site will cause the loss of the Scout Hall and this will then need to be replaced elsewhere*

*Page 68*

*6.5.12 policy SW15: - 1. Proposals to develop the site at 56 High Street will not be allowed until equivalent or better replacement Scout hall is constructed and opened elsewhere. 2. The site must not be broken up into small parcels which may prevent the land being commercially used for modern town centre uses.*

**Action Proposed**

No action required.

SW13 17 Market Hill & 29-31 Church Street

13-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policy SW 13 17 Market Hill &amp; 29-31 Church Street</b> Neighbourhood plans are not able to impose standards relating to internal layout of dwellings. Can this issue not be dealt with through a Listed Building Application/Consent?	
<b>Action Proposed</b>	
No action required	

## SW14 Shopfront design

### 14-1

<b>Contact Details</b>	
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policy SW14 Shopfront design</b> The Saffron Walden Conservation Area Appraisal UDC 2018 noted in the management actions a noted concern with the design of shop fronts and fascias. Some guidance is included in the emerging Local Plan. The SWNP might usefully provide some detailed local guidance on shop front design. The Chalfont St Peter NP or the Hayle NP both incorporate useful shopfront design guides which might serve as a model	
<b>Action Proposed</b>	
Look at the design guides proposed and perhaps adopt the draft UDC shopfront design guide and rebrand it as ours, incorporating best practice identified elsewhere. <input checked="" type="checkbox"/>	

## SW16 Regeneration of George Street

### 16-1

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ████████████████████
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>Policy SW16 – Regeneration of George Street</u> – In reviewing policy SW16 it is recommended that further consideration would need to be given to bullet point 2 which refers to a possible closing of the road. It is important to note that any road closure would need to be planned within the context of a highway strategy for the town. Accessibility for those with disabilities, cyclists and public transport as well as commercial requirements would have to be considered. ECC therefore recommends the policy be amended to <i>“Implementation of traffic restrictions to make the road more attractive to pedestrians, visitors and shoppers”</i>.</p>	
<b>Action Proposed</b>	
Review the wording on this policy. Perhaps a weight limit on the street? <input checked="" type="checkbox"/>	

### 16-2

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ████████████████████
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>SW 16 – Regeneration of George Street, SW 17</u> – ECC recommends the following policy provision be included –</p> <ul style="list-style-type: none"> <li>- <i>Sustainable drainage system (SuDS) must be incorporated in any new developments if possible.</i></li> </ul>	
<b>Action Proposed</b>	
Amend the policy as suggested. <input checked="" type="checkbox"/>	

## SW18 High quality communications infrastructure

### 18-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
This is very good to see! I have been searching neighbourhood plans with digital connectivity targets. Well done!	
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 18-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
What does this comment mean? Is Saffron Walden welcoming in 5G? What is the large mast near Harris Yard, for instance? Have you conducted research into the health effects of this new digital connectivity upon residents, animals, plants?	
<b>Action Proposed</b>	
None (policy relates to fibre not wireless)	

### 18-3

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<u>Digital Connectivity and Minimising Commuting</u> – ECC notes that paragraph 7.1 sets out some of the benefits of having an efficient connection to the internet. It is recommended that this paragraph also highlights the opportunity that high quality internet connectivity can provide to enhance the ability for working from home, which minimises the need to travel to work.	
<b>Action Proposed</b>	
Reference to home working is made in paragraph 6.6.2. No action required.	

### 18-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<b>Chapter 7: Digital connectivity (Page 71)</b> <i>Agree with content - no additional comment.</i>	
<b>Action Proposed</b>	
No action required	

## SW19 Ecological requirements for all new domestic and commercial developments

### 19-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Anglian Water
<b>Comment</b>	
<p>The policy as drafted requires the incorporation of Sustainable Drainage Systems in all new developments. Anglian Water fully supports the incorporation of Sustainable Drainage Systems wherever possible to addresses the risk of surface water and sewer flooding and which have wider benefits including water quality.</p> <p><u>Point 10</u>: My understanding is that a BREEAM standard is normally used for commercial buildings including water use. Although I would seek further advice from the District Council on to what extent the neighbourhood plan can specify water efficiency standards and how these would relate to the emerging Local Plan.</p> <p>Point 11: I would suggest the following wording:          '11. Water reuse and recycling and ,rainwater harvesting and surface water harvesting should also be incorporated wherever feasible to reduce demand on mains water supply.'</p>	
<b>Action Proposed</b>	
Adopt new wording. <input checked="" type="checkbox"/>	

### 19-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
<p>SW19 Requires all new development to have 50% green surfaced space with biodiversity improvements. Requires all development to incorporate sustainable urban drainage with biodiversity improvements. Greater flexibility is required where opportunity to achieve 50% Green surface may be more limited. For example, in Conservation Areas or sites which are within the setting of Listed Buildings where the opportunity to incorporate innovative design solutions may be more limited.</p>	
<b>Action Proposed</b>	
Redraft policy to allow for flexibility in Conservation Areas, and for flexibility where development is on a not-for-profit basis. <input checked="" type="checkbox"/>	

### 19-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>All watercourses, (eg the various slades) in the parish, should be seen as wildlife corridors, and have a protected, no development buffer zone on either side.</p> <p>Action should be taken to enhance wildlife habitat and food supplies in the historic" area of Audley Park, and and a similar size area to the East of the town should be acquired as as a protected area for wildlife, with public access. (* ie including English Heritage area, golf course, and area farmed by Audley End estates, up to and including Littlebury)</p> <p>Beechy Ride should be restored, re-establishing the avenue of mature beech trees, and managed as a protected wildlife corridor along its whole length, from Audley End village to Thieves Corner, and the watercourse and surrounding vegetation on both banks protected up to the Debden Road.</p> <p>A large community orchard should be established in the town (eg) on windmill hill adjacent to the allotments.</p> <p>Claypits Plantation should be managed as a natural habitat and some replanting of larch trees should take place. It should also be recognised as a site of potential archaeological significance as it was worked as claypits, (with brick kilns) from at least 1605.</p>	
<b>Action Proposed</b>	
Put these suggestions to SWTC but no action required for SWNP	

#### 19-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
Support this policy, and wildlife movement needs to considered really strongly. More and more people are turning their gardens into barren fenced boxes.	
<b>Action Proposed</b>	
Supportive of policy – no action required.	

#### 19-5

<b>Contact Details</b>	planning.ipswich@environment-agency.gov.uk
<b>Organisation</b>	Environment Agency
<b>Comment</b>	
<b>Water Quality</b>	
The plan should consider impacts upon water quality brought about by development: consideration should be given to preserving and enhancing the water quality in the local	

area. Connecting all properties to the mains sewerage system as the preferred option will enhance water quality as this follows the drainage hierarchy. This seeks to treat foul water at a water recycling centre and to steer developers away from less environmentally beneficial forms of disposal such as septic tanks and cess pits. Further benefits to the water environment can be achieved by; reducing misconnections to the surface water system; reducing contaminated surface water run-off and reducing spills of pollutants. All of these approaches could all help to enhance the natural environment.

<b>Action Proposed</b>	
1) Add a policy to ensure that all properties will be connected to the mains sewerage system as the preferred option (although it is unlikely that any developer in this area would be hoping to do otherwise)	
2) Control of contaminated surface water run-off and spills of pollutants would be a consideration addressed in any planning application for development which could pose these risks, and it is likely that the planning authority would, in consultation with the EA, impose appropriate conditions on any permission given. Drafting a specific policy on this should not be necessary for the NP.	<input checked="" type="checkbox"/>

19-6

<b>Contact Details</b>	planning.ipswich@environment-agency.gov.uk
<b>Organisation</b>	Environment Agency
<b>Comment</b>	
<b>Fisheries, Biodiversity and Geomorphology</b>	
We welcome the efforts to; improve the natural environment, connect areas of woodland, improve green corridors and promote planting within new developments which are described within the plan. The chapter on Ecology and the references to biodiversity are well considered and comprehensive. We would encourage that any planting should be made up of, UK grown, native species to avoid the risk of the spread of disease. In addition, simple things like the provision of ‘hedgehog holes’ in garden fences enable wildlife to increase their range and access to the garden green spaces within a town environment	
<b>Action Proposed</b>	
1) During the plan preparation the definition of “native species” was hotly and ultimately inconclusively debated by the steering group (and therefore dropped) , but for the reasons given above, specifying “UK grown” should be added.	
2) Add to SW19 (1) “the provision of hedgehog holes in fences”.	<input checked="" type="checkbox"/>

19-7

<b>Contact Details</b>	
<b>Organisation</b>	
<b>Comment</b>	

All looks encouraging but might I add all new builds have provision for wild life eg roosting boxes, nesting and bat box provision Every garden fence have an opening conducive for wildlife cut throughs eg hedgehogs

**Action Proposed**

Add supporting text + policy on similar strategies to that which Barratt Homes has agreed with RSPB.

**19-8**

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ██
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<b>Organisation</b>	Essex County Council
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**Comment**

SW19 – Ecological Requirements for New Domestic and Commercial Developments (page 73) – ECC recommends that the policy provisions be revised as set out below (underlined text) –

- Sustainable drainage systems will be planted with appropriate plants to encourage a biodiverse habitat, and designed for maximum amenity, using the guidelines and checklists of the CIRIA Suds Manual 2015 and ~~or its successors~~ Essex SuDS Design Guide 2020 (ECC will be publishing this soon and will provide a copy).
- The underground storage tanks are the least favourable option and should only be used as a last resort. Where the underground SuDS will be designed so ~~that~~ the ownership of the land above can be transferred to the public sector while the SuDS can remain in private ownership.

ECC also recommends that the Plan includes the following supporting text – “A sustainable drainage system (SuDS) is designed to promote a best practice approach to reduce the potential impacts of surface water flooding with respect to existing and new developments. It replaces the conventional and traditional ways of surface water management and provides a system which mimics the natural ways to manage surface water.

*SuDS schemes ensure to maximise the above ground features which broadly covers four major principles to manage surface water runoff; water quality, water quantity, amenity and biodiversity. Incorporating SuDS mitigates the risk of flash flooding, water pollution, water scarcity, improve landscape with use of multi-benefit space and enhance biodiversity. The use of rainwater harvesting or grey water recycling as part of new developments should mitigate the climate change consequences such as water scarcity and flooding” .*

Appendix 4 – Design of Sustainable Drainage Systems – ECC notes that the Environment Agency SUDS requirements are set out within appendix 4. It is recommended that the Local Lead Flood Authority and Environment Agency SuDS requirements be stated.

**Action Proposed**

Amend policy and text as suggested.

19-9

**Contact Details**

**Organisation**

**Comment**

Fully support this. Our wildlife is endangered and must be protected. I would like to see many more trees and hedgerows planted. I have recently noticed a lot of trees have been cut down, for example on the Hollyhock/Radwinter Road junction. What is this all about?

**Action Proposed**

No action required.

19-10

**Contact Details**

**Organisation**

Carter Jonas

**Comment**

**Representation 4 - Policy SW19 – Objection**

While the aspiration set out within policy SW19 is noted and understood the policy as drafted is overly restrictive and unjustified. As drafted, the policy requires 50% of all sites to be laid out as green surface space. Reference is made to the TCPA guidelines. These guidelines have been drafted to help guide the development of new Garden Cities. When planning a new Garden City which has a significant land area, the principle of delivering substantial areas of green space can be developed and worked through. Applying that same principle to development sites of all sizes is unrealistic and is not achievable. Such an approach would also not contribute to the achievement of sustainable development. By way of an illustration, if every residential site were to be required to provide half of the land as green surface space, development densities of 40 dwellings per hectare, as required by Policy SW6, will only be able to be achieved if high rise developments are brought forward. If high rise developments are not deemed to be appropriate (which is likely to be the case across much of the town), either more land will be needed to accommodate the development needs of the town or the development needs will simply be unable to be satisfied (the likely outcome given other restrictions set out within the SWNP). Efficient use of land will not be able to be made and development is more likely to sprawl out away from the services, facilities and transport hubs provided within existing settlements.

In the context of commercial development, particularly on a brownfield sites (such as at Ashdon Road) the principle of delivering 50% of the site as green surface space would simply be impossible and also undesirable.

The TCPA guidelines for Garden Cities are simply not transferable to all forms and scales of domestic and commercial development. Delivering wildlife and biodiversity enhancements, areas of landscape planting, open space and SuDs are all welcomed. As drafted, the policy is not however consistent with the strategic policies of the Development Plan and is not capable of contributing to the achievement of sustainable development.

**Action Proposed**

3) No change to green space – this can be green roofs or tree canopy for example so does not need to impact on the footprint of the site or possible densities.

**19-11**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<b>Chapter 8: Ecology (Page 72)</b> <i>Agree with content - no additional comment.</i>	
<b>Action Proposed</b>	
None required	

## SW20 Promoting walking and cycling

### 20-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	All roads in saffron walden, new or old should have a 20mph speed limit. Many roads are narrow and pedestrians should take priority. A 20mph speed limit will be safer for all, and reduce noise and exhaust pollution all over town. Everyday I see people driving well over 30mph around town, more enforcement is needed with traffic calming measures.
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 20-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	Support these policies. Sounds like the 20mph limit will be applied to new streets and developments. It would be great to see the 20mph rolled out across the town. Slowing traffic down increases safety for cyclists and pedestrians, meaning more people are likely to walk/cycle, reduces noise pollution again increasing the attractiveness of walking/cycling.
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 20-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	Definitely support these policies. Particularly pleased to see an environmental focus, including porosity of developments.
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 20-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	

I welcome this policy and fully support it. I did have to persuade Bloor Homes, opposite Ridgeons where I live, to cut a gap in the iron railings they used to fence off the field at the front, so that walkers could cut through rather than walk around the roads but they did comply and this has shortened the walk to the town by a quarter of a mile and made it more pleasant. However, this cut through cannot be used by Mums with buggies easily because of the steep bank. These sort of practicalities to promote walking and cycling should definitely form part of the planning conditions.

**Action Proposed**

Supportive of policy – no action required.

**20-5**

**Contact Details**

[REDACTED]

**Organisation**

Littlebury Parish Council

**Comment**

SW20 Promoting Walking and Cycling.  
Walking and cycling routes in new developments should link to existing routes but also be designed so they can be used as part of creating new routes in Saffron Walden and between the town and neighbouring villages.

**Action Proposed**

None possible – outside the remit of SWNP area

**20-6**

**Contact Details**

[REDACTED]

**Organisation**

[REDACTED]

**Comment**

It is possible to walk from one side of the town to the other if in reasonably good health. However, what needs to be factored into the town's development (& remedial action to established developments) is planning awareness for far greater pedestrian safety. Traffic density at peak times and the speed and nature of vehicles travelling are a hazard in themselves BUT so too is the lack of:  
Safe pedestrian crossings  
Traffic calming measures  
Safe paving - constructed to avoid vehicles being driven at speed up onto and, at times, along pavements. Pavements being built to create safer pedestrian access( example see Ashdon Rd past Homebase to De Vigier Avenue) Pavements maintained ( example plant overgrowth across Victoria Avenue from Thaxted junction; shrubs overhanging pathways necessitating a move closer to/ in roadways to pass along) Creating pedestrian cut throughs to facilitate greater pedestrian access across the town Get adult cyclists off pavements - new planning to incorporate cycle tracks would be a start

**Action Proposed**

[REDACTED]

No change – the plan goes as far as possible to encourage better accessibility for those on foot/bicycle. ECC is ultimately responsible for the implementation of these measures.

20-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	[REDACTED]
<b>Comment</b>	<p>2) The heat map of commuters shows a large amount of traffic moving to Cambridge. However, there is no dedicated cycle way into Cambridge. A cycleway connecting Saffron Walden to the Chestford Research park, the Hinxtton Campus and the Cambridge biomedical campus would surely help more people make their commute by bike. This would have to be developed separately (but possibly next to) existing infrastructure. Please consider this to increase cycling safety, improve environmental impact and increased population health.</p>
<b>Action Proposed</b>	
	<p>Much of the scheme proposed is outside the SWNP area, and so beyond the remit of this plan. It falls ECC and South Cambs for implementation. (However the scheme is implicitly supported)</p> <p>While the highway policy is the remit of ECC the SWNP should state, as a minimum, SW's aspirations for highway and vehicle management (including provision for pedestrians &amp; cycling) in SW and its hinterland. <input checked="" type="checkbox"/></p> <p>Make some reference to the lack of cycle schemes connecting SW with the wider area as well as within SW and that we would wish to see these. Looking again at existing para 10.2.9, add in a reference to the national Manual for Streets, stating what their requirements are and that where possible cycle paths should comply with its requirements? Similar to your wording on the SWTC website <input checked="" type="checkbox"/></p>

20-8

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	[REDACTED]
<b>Comment</b>	<p>I note that you plan to introduce parking restrictions on the Little Walden Road at the junction of Catons Lane. This will only push the congestion further towards Little Walden. I suggest that the restriction needs to be extended to the junction with Lamberts Cross on the West side and restricted to residents parking in limited areas on the East side.</p>

Otherwise you will only push the parking, the congestion and pollution a short distance and possibly make it worse. The green space between the Little Walden Road also needs to be protected from parking along the same length, i.e. to Lambert Cross. The parallel road, also called Little Walden Road, also needs to be restricted to residents only on the West side and designated 'no parking' on the East Side. Parking being restricted to residents only also needs to be considered on Highfields and De Bohun Court. All of these roads are regularly filled with workers' cars during the day and these people park without any care or concern for the residents. The fact this these areas are suffering from town workers parking is confirmed by the absence of virtually all cars in these locations after 6.00pm and before 7.30am. There is adequate parking in Swan Meadow and the council provides season tickets at very reasonable rates.

Obstructive parking on pavements, which actually prevents pedestrians, buggies, prams, wheelchairs, or mobility scooters, on on zebra crossings zigzag lines needs to be policed much more actively, as will the areas of parking restriction both present and proposed. Current Warden activity appears to be restricted to car parks and the town centre. The Wardens need to be instructed on this wider brief as, from enquiries and observation, I find the police in Saffron Walden have little interest in obstructive parking or traffic management.

One final observation and suggestion is that you consider making Ashdon Road, Radwinter Road and Elizabeth Way a one-way system as this would dramatically reduce pollution and congestion, particularly around the Thaxted lights.

<b>Action Proposed</b>	
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These measures are beyond the remit of the SWNP but should be considered by NEPP and ECC
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## 20-9

<b>Contact Details</b>	██████████ ████████████████████
<b>Organisation</b>	
<b>Comment</b>	
Re Appendix 3, wish list Item 1	
<p>This entry suggests that the stretch of the Battle Ditches from Abbey Lane to Saxon Way (that should be Beck Row anyway) should be widened and open to cyclists. I think this is a bad idea on two counts:</p> <ol style="list-style-type: none"> <li>1. I cannot see how this path could be widened without damaging the appearance of this medieval site.</li> <li>2. The present footpath is much used by dog walkers and the elderly. Both would be endangered if cyclists were encouraged to use this route, especially if it were to be used by young cyclists from the High School. The slope encouraging high speed would be irresistible!</li> </ol>	

I think there was similar proposal by ECC about twenty years ago, which also suggested that the narrow footpath from the Gibson Estate to Beck Row should be open to cyclists. It was rejected by the then Town Council as being far too dangerous. This latest proposal suggests someone drawing nice lines on a map, rather than looking at the implications of what is suggested.

**Action Proposed**

No change

**20-10**

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ██████████
<b>Organisation</b>	Essex County Council
<p><b>Comment</b></p> <p><u>Detailed Transport Action</u> – ECC notes that the Plan sets out some detailed transport actions within paragraph 10.1.12 (page 83 – 84) that are seeking to make aspirations a reality. Whilst ECC welcomes that the Plan is seeking to make changes it is important to note that the changes proposed need to be realistic, deliverable, evidence based and enforceable. ECC therefore welcomes further discussions on these. Outlined below sets out some of the matters that ECC would welcome amendments, changes or clarity. The headings reflect those outlined in paragraph 10.1.12.</p> <ul style="list-style-type: none"> <li>- <u>Improving Safety for Pedestrians and Cyclists</u> – The Plan states in bullet 3 – “to campaign for all streets to have 20mph speed limits”. ECC considers whilst this may be an aspiration it may not be appropriate for all roads. It is recommended that the Plan identifies where 20mph may be deliverable and realistic. ECC welcomes further discussions on this.</li> <li>- <u>Improving Provision of Public Transport</u> – ECC considers that this section of the Plan should be more specific and provide the key objectives for future public transport provision for the town. The objectives should be clearly articulated, informed by evidence and deliverable.</li> </ul> <p><u>Policy SW20 – Promoting Walking and Cycling</u> – ECC notes that policy SW20 refers to “existing footpaths and pedestrian cut-throughs”. Within Saffron Walden there are a number of footpaths that are maintained by UDC and this should be acknowledged.</p> <p>ECC may not always support new routes being adopted as Public Rights of Way (PROW) on the definitive map. ECC determines whether a route can be considered a PROW based on <a href="#">set criteria</a></p>	

including how it relates to the existing PROW network. It may be more appropriate for routes to be permissive footpaths or adopted as highway footway/cycleways within the development. The creation of cycle routes onto pedestrian only PROW will not be permitted and new footpaths that conform to Secured by Design are likely to be adopted routes, not PROW. The following wording changes are recommended for Policy SW20, paragraph 2 –

- Paragraph 2 Bullet 1 – *“Existing footpaths, footways, Uttlesford District Council footpaths and pedestrian cut-throughs through town are protected”.*
- Paragraph 2, Bullet 2 – *“New footpaths, footways and cycleways are designed and built to a standard that they can be adopted by Essex County Council Highway Authority”.*
- Paragraph 2 Bullet 4 – *“footways/cycleways on new developments conform to recommendations made by Secured by Design – New Homes 2014 and the [Essex Design Guide](#)”.*

The [Uttlesford District Cycling Action Plan \(March 2018\)](#) outlines opportunities to promote and provide infrastructure for cycling in Saffron Walden, these schemes are a priority for the highway authority. In order for ECC to consider schemes on the highway they must be subject to a process which includes feasibility, deliverability and safety audit. In addition, schemes designed to mitigate new development must meet the three tests in paragraph 56 of the National Planning Policy Framework (NPPF). ECC would welcome discussion on the walking and cycling schemes on the wish list in order to understand the intent, feasibility, deliverability and priority of the schemes. It is recommended that the wording in paragraph 3 and 4 be changed to reflect this.

Paragraph 3, Bullet point 2 – *“Until or unless an up to date highways study is carried out, when prioritising schemes for funding, consideration should be given to the Uttlesford Cycling Action Plan and the SWNP infrastructure schemes taking into account the deliverability and impact of the schemes”.*

Paragraph 4 – *All new streets within developments should be designed to keep vehicle speeds at or below 20mph where appropriate.*

<b>Action Proposed</b>	
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**SW20**

1) It is considered that 20mph speed limits are both deliverable and realistic; almost the entirety of London is now 20mph so there does not seem to be any good reason why this should not be replicated in Saffron Walden. No action required.

2) Improving provision of public transport – see response to response on Policy SW22.

3) Re suggestion on Paragraph 2 bullet point 1, amend to say **“Existing footpaths and pedestrian cut throughs through town are protected irrespective of ownership”**

4) Amend wording on Paragraph 2 Bullet point 2 to say “New footpaths, footways and cycleways are designed and built to a standard that they can be adopted by Essex County Council Highway Authority, or as an exceptional measure by Saffron Walden Town Council via a dedication under Section 30 of the Highways Act. In the event of the latter Saffron Walden Town Council will seek a reasonable funding contribution for future maintenance.”

5) Amend wording on Paragraph 2 Bullet point 4 as suggested.

6) Amend wording on Paragraph 3 Bullet point 3 as suggested, except change “UCAP and the SWNP” to “UCAP or the SWNP”. This is to avoid the potential for the UCAP to take precedence over the SWNP. This is because the UCAP schemes have so far been declared unfeasible and undeliverable, so it would be unwise for the SWNP to rely upon this list of schemes alone.



7) No change to wording on Paragraph 4.

**20-11**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
One of the effects of the new developments is to shift the geographic centre of the town east and south. A quick visual estimate would put it around R A Butler school. The actual town centre is well into the north-west quadrant so the library, banks, post office medical facilities, and most retail outlets, are clustered well away from the new housing. Although the town is modestly sized, the geology, coupled with poor pavement provision, means that going shopping and carrying purchases home (often uphill) is a major deterrent to walking. I strongly support Marion's comments above. Thaxted Road and Ashdon Road are particularly challenging for pedestrians and both of these are key routes from the new developments into town.	
<b>Action Proposed</b>	
None required	

**20-12**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
SW20 - Strongly support this policy.	
<b>Action Proposed</b>	
No action required.	

## SW21 Travel planning

### 21-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
SW21 Travel Planning. Supported.	
<b>Action Proposed</b>	

### 21-2

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>Policy SW21 - Travel Plans – ECC welcomes the recognition of the importance of travel plans. Currently <a href="#">ECC guidance</a> is that all residential developments over 250 dwellings and all commercial sites with over 50 employees require a travel plan. However, this guidance is currently being reviewed across the county. Within Saffron Walden smaller developments have been expected to implement travel plans due to the AQMA designation. ECC monitor travel plans but cannot insist that a specific body deliver it. ECC considers that this policy in the Plan could be strengthened and therefore recommends the following amendment to paragraph 2 – <i>“In all cases the Town Council should be approached and given the opportunity express an interest in co-ordinating the travel plan”</i>.</p> <p>It is also recommended that SWTC consider a threshold for travel plans and include it in this policy.</p>	
<b>Action Proposed</b>	
<p>1) Amend wording on part 2 of the policy as suggested.</p> <p>2) Consider a threshold for travel plans. <input checked="" type="checkbox"/></p>	

### 21-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
Re Travel Plans: are they ever followed up on? Are there any penalties for developers if they are not implemented?	

<b>Action Proposed</b>	
No action required.	

## SW22 Improving provision of public transport

### 22-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	The King Edward VI Almshouse Charity
<b>Comment</b>	
Agree in principle but all contributions should be viability tested	
<b>Action Proposed</b>	
No need to redraft policy to remove not-for-profit housing development – this would be filtered out in a viability assessment anyway	

### 22-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Littlebury Parish Council
<b>Comment</b>	
<p>SW22. Improving public transport          Reducing the volume of traffic taking children to school by providing adequate affordable public transport would make a major contribution to air quality and health and should be a priority.          A more frequent circular route shuttle bus, serving say Audley End station, Audley End house, Saffron Hall, town centre, Lord Butler, Tesco, Thaxted Rd, would provide better access to local facilities for residents and visitors.</p>	
<b>Action Proposed</b>	
None – suggestion supported by NP	

### 22-3

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>Public Transportation within Uttlesford and Saffron Walden</u> – ECC acknowledges that throughout the Plan it continually highlights the perceived inadequacy of the public transportation provision within Uttlesford District and specifically Saffron Walden. This is demonstrated by the following statements –</p> <ul style="list-style-type: none"> <li>- “Public transport options for workers commuting into town are limited” (page 13, bullet 32).</li> </ul>	

- “The town has poor public transport links which means that not only is it hard to commute out of the town without using a private car, it is also difficult to come in as a visitor” (page 13, bullet 33).
- “Limited public transport network” (paragraph 5.3.1).
- “Bus services in Saffron Walden are limited, with many services finishing mid-afternoon, so are not useful for commuters. They are even more limited on Saturdays and on Sundays there are no buses at all” (paragraph 5.3.3).
- “Public transport networks are relatively poor” (paragraph 10.1.4).
- “Car ownership across Uttlesford is higher than the national average reflecting its rural location and limited public transport network” (page 46 paragraph 5.3.1).

It is important to note that whilst the Uttlesford District is a rural locality, the public transport provision in some areas of the district is better than would be expected due to the operational needs and close proximity of London Stansted Airport. The airport facilitates public transportation services such as bus and coach operations. The airport is an interchange improving local connectivity allowing people that live, work and invest to utilise the airport as a transportation interchange.

The Plan states “Bus services in Saffron Walden are limited, with many services finishing mid-afternoon, so are not useful for commuters. They are even more limited on Saturdays and Sundays as there are no buses at all. Buses in Uttlesford are difficult to run as a commercial venture and therefore are largely subsidised. Services tend to run close to the point where the subsidy per passenger is at the limit of viability. ECC funds are under pressure and bus provision is not a statutory requirement, making it an obvious place for cost savings. Bus services are not forecast to increase in Saffron Walden and the use of private vehicles is not forecast to decline” (Page 47, Paragraph 5.3.3). ECC wishes to provide some clarification on the matters outlined within this paragraph.

It is common for there to be fewer services operating on a Saturday as compared to during the week, however with regard to Sunday services, whilst these are reduced, it is not factually accurate to say that there are “no buses at all”. It is also important to note that the local bus budget spend per head of population is greater in Uttlesford District compared to any of the other Essex authorities. ECC and Uttlesford District Council (UDC) are also working closely together to maximise the potential of developer funding for the provision of new or improved bus services.

Travel Needs Survey – ECC notes that there are a range of statements that suggest there is an appreciation of the travel behaviour of persons living, working and investing in Saffron Walden. This is concluded from the following statements –

- “... Almost half of all residents in Uttlesford travel to work outside the district...” (Page 8 paragraph 2.18).
- “The town has poor public transport links which means that not only is it hard to commute out of the town without using a private car, it is also difficult to come in as a visitor” (Page 13 bullet 33).

- "... local employers report that a significant number of the key services in Saffron Walden are supplied by people commuting into the town each day, for lack of housing affordability within the town" (Page 8 Para 2.18).
- "... The issue of high school run traffic volumes overlaps the areas of spatial planning, transport capacity..." (Page 9 paragraph 3.4).

It is recommended that Saffron Walden Town Council (SWTC) undertake a Travel Needs Survey to provide clarity and the evidence for the travel experience anticipated within Saffron Walden. This information would to assist in ongoing strategic transportation planning and assist in understanding travel behaviour patterns within Saffron Walden and Uttlesford District more widely. ECC welcomes discussing this further with SWTC and can assist in scoping this work.

**Action Proposed**

It is primarily the responsibility of ECC as provider of public transport to conduct a travel needs survey for Saffron Walden and then provide accordingly for the findings (including but not necessarily exclusively through developer contributions. This is not a responsibility which has been devolved down to SWTC.  
No change to SWNP but pass the suggestion on to SWTC for comment.

Tweak the wording to make clear the subsidy position and the fact that bus service provision for new developments and its effect on reducing car use should be treated with scepticism.

Note that at Local Plan hearings July 2018 MAG opposed expansion of regional bus services on their land, beyond what was required to service the airport.

**22-4**

<b>Contact Details</b>	██████████ Principal Planning Officer (Spatial Planning) ████████████████████
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>Policy SW22 – Improving Provision of Public Transport – ECC suggests that the Plan would benefit from some clear priorities for improving passenger transport routes and infrastructure. ECC would welcome discussion concerning the priorities for public transport improvements serving the town. ECC recommends the following change to the wording of policy SW22</p> <ol style="list-style-type: none"> <li>1. <i>“Developers will be expected enhance public transport services and public transport infrastructure to improve connections and accessibility to key destinations from the location of their site”.</i></li> </ol> <p>ECC recommends that consideration be given to ensure that the policy develops priorities for the public transport network and seek funding opportunities to develop and support the network.</p>	

<b>Action Proposed</b>	
Amend wording as suggested, and pas above comments to SWTC.	<input checked="" type="checkbox"/>

22-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	
<p><b>Representation 5 – Policy SW22 – Objection</b></p> <p>In order to accord with the Community Infrastructure Levy Regulations, all financial contributions required in relation to any planning permission granted need to be necessary, directly related to the development and fairly and reasonably related in scale and kind to the development.</p> <p>As drafted, Policy SW22 implies that all developments will be required to provide a “<i>meaningful contributions towards the provision of public transport</i>”. For the policy to be consistent with the CIL regulations and justified, the policy needs to make clear that developers will be required to provide a meaningful contribution towards the provision of public transport only where such a contribution would accord with the statutory tests set out within the CIL regulations.</p>	
<b>Action Proposed</b>	
Amend text to clarify	<input checked="" type="checkbox"/>

## SW23 Vehicular transport

### 23-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>10.4.5 I would wholeheartedly support a last mile delivery service to reduce HGVs in the town centre. Could areas in existing car parks be used to this end? Swan Meadow? Could those car parks attached to big stores also be used (Asda, Tesco, Lord Butler, Ridgeons) ? Or are those privately owned by the stores? Is there any disused land out of town where it might be possible to have an out of town parking area to do this and link it with a small version of park and ride for SW? Or could HGV access be limited to certain times of day / days of the week?</p>	
<b>Action Proposed</b>	
<p>If HGV access could be limited through ECC making new highways regulations, then a simultaneous project would need to look at sites for last mile delivery depots.</p> <p>Add in supporting text / policy on this point. <input checked="" type="checkbox"/></p>	

### 23-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>If there was a proper link from Shire Hill to Tesco then many of these lorries could be redirected.</p> <p>Support this policy in general</p>	
<b>Action Proposed</b>	
<p>The Shire Hill / Radwinter Road link is scheduled to open when Linen Homes site is completed. No action required.</p>	

### 23-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>Any move toward the creation of a by pass for traffic and thereby getting heavier traffic out of the town centre?</p> <p>Glaring oversight is a link road from Thaxted Rd behind/via Shire Hill our to the Tesco end I'd Radwinter Rd Believe the Shire Hill /Thaxted Rd needs to be a roundabout too</p>	

<b>Action Proposed</b>	
The Shire Hill / Radwinter Road link is scheduled to open when Linen Homes site is completed.	

#### 23-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	[REDACTED]
<b>Comment</b>	I am in total agreement with Marion Gillman. I live in the new development opposite Ridgeons and there is absolutely no incentive for people to walk to the town centre rather than drive. For example, because there is no footpath adjacent to Dame Bradbury School, people are obliged to cross the road at least once to walk on the other side, and there is no safe crossing for children. Cars are constantly mounting the pavement along Ashdon Road to get through, endangering the lives of pedestrians and the air is polluted with traffic fumes. Until something is done to address the problem of the abysmal infrastructure and improve public transport, no building should take place to the North or South sides of the town. Everyone should be mindful of global warming and the effects on the environment and encouraging sustainable development. Whereas I do not wish our beautiful countryside to be ruined by a ring road, this may be the only solution to the problem.
<b>Action Proposed</b>	
None required	

#### 23-5

<b>Contact Details</b>	[REDACTED] [REDACTED]
<b>Organisation</b>	Highways England
<b>Comment</b>	We have reviewed your proposed local plan and conclude that it is unlikely to result in an impact upon the strategic road network  The plan is a level down from the broader Uttlesford local plan as such impacts on the Strategic Road Network should be taken account in their evidence base. It is recognised that the Town is a rural one and therefore to some extent car dependant and that the plan makes some effort to address that.
<b>Action Proposed</b>	
None required	

#### 23-6

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
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<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>Policy SW23 – Vehicular Transport – The <a href="#">Uttlesford Local Plan Highway Assessment</a> was updated in March 2014, there are a suit of mitigation measures within that document to help mitigate the impact of growth on the network and help divert traffic away from the most polluted area. In addition, UDC and ECC commissioned further transport work to support the 2019 UDC draft Local Plan which is more up to date and available on UDC’s website. It is important to note that any condition put on a development must be enforceable.</p> <p>ECC recommends that policy SW 23 paragraph 1 bullet point 1 is reviewed and the wording amended to read – <i>“Further developments which are beyond the east of the town’s development limits and which generate additional traffic movements through the town will only be supported if capacity and sustainable transport measures are provided that will ensure that there is no severe impact on the town highway network”</i>.</p>	
<b>Action Proposed</b>	
<p>‘Severe’ is subjective and therefore cannot be accurately interpreted. The current policy text is clearer. No action proposed.</p>	

### 23-7

<b>Contact Details</b>	philip.marns@littlebury.org.uk
<b>Organisation</b>	
<b>Comment</b>	
<p>SW23. Vehicular Transport Supported, though as set out in the response to SW8 we believe this should include a large percentage of EV charging points. High availability will reduce range anxiety and make the town attractive to early adopters of EVs.</p>	
<b>Action Proposed</b>	
None required	

### 23-8

<b>Contact Details</b>	██████████ ████████████████████
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	
Representation 6 – Policy SW23 – <b>Objection</b>	

As drafted, Policy SW23 would prevent any development occurring beyond the east of the town's development limits which will generate additional traffic unless it can be demonstrated that the development will not increase congestion and if the AQMA has been lifted. Certain forms and scales of development that will result in an increase in traffic movements could occur to the east of the town and not have an adverse impact on the air quality within the AQMA, (the AQMA is centred on the town centre). It is therefore not justified to place an embargo on all development until the AQMA has been lifted. If a development could occur that would not cause an adverse impact on the AQMA it would not be justified to prevent that development until such a time that the AQMA had been lifted. Do so would not contribute to the achievement of sustainable development as it would unnecessarily restrict development that might otherwise be acceptable in a highly sustainable location.

In order to be justified, Policy SW23 needs to be amended. The second bullet point could, for example, read *"it can demonstrated that development will not result in an adverse impact on air quality within the AQMA"*

<b>Action Proposed</b>	
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Amend
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23-9

<b>Contact Details</b>	██████████ ████████████████████
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	<b>Chapter 10: Transport infrastructure (Page 76 to 90)</b> <i>Agree with content - no additional comment.</i>
<b>Action Proposed</b>	
None required	

## SW24 Allotments

### 24-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I support these policies	
<b>Action Proposed</b>	
Supportive of policy, no action required.	

### 24-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
Strongly support this	
<b>Action Proposed</b>	
Supportive of policy, no action required.	

### 24-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policies SW24, SW27 and SW29</b>	
There is not enough information in the table or otherwise to convince us that all the sites would meet the criteria set out in paragraph 100 of the NPPF. A better approach would be to provide a detailed assessment of each site outside the plan (provide this alongside the plan) and for the plan to focus on the designation and refer back to that evidence and state that all spaces meet that criteria. Each of the sites should be assessed against the criteria.	
<b>Action Proposed</b>	
Improve the description as recommended	<input checked="" type="checkbox"/>

### 24-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	
<b>Representation 7 – Policy Sw24 – Objection</b>	

In order to be effective, justified and flexible it is considered that draft Policy SW24 needs to acknowledge that the off-site provision of allotments can be secured by means of a financial contribution. Any such financial contribution would however need to accord with the CIL Regulations and would therefore only be required if there was an identified need for additional allotments. While a need for allotments may exist now, later in the plan period that position might change. The policy needs to be sufficiently flexible in this regard.

**Action Proposed**

Review policy to see if it can be improved



## SW25 Playing fields and sports halls

### 25-1

<b>Contact Details</b>	████████████████████
<b>Organisation – If commenting on behalf of</b>	
<b>Comment</b>	
<p>Has anyone actually worked out the area needed for 3 rugby pitches, 8 shared rugby and football fields, 6 further fields, a cricket pitch, a sports hall, clubhouse facilities and a demountable competition standard pool plus running and walking trails plus all the associated parking ..... it certainly will not fit onto the field owned by Kier off the Thaxted Rd. This site is a non-starter as it is on a steep hill with a major gas main running beneath, cutting pitches into the hill won't work. There hasn't been any consultation with more modern sports who don't use pitches and are more individual and free to use. What about a BMX track ? The consultation seems to have been only concerned with "old fashioned" sports.</p>	
<b>Action Proposed</b>	
<p>None - Satisfied that the spatial requirements have been adequately estimated. The "Kier" site referred to here is not linked to this policy. The skate park had a representative on the NP Steering Group for several years and the representative did not raise the need for BMX track. The previous BMX track in SW ceased to be used and the land has since been repurposed as a forest school.</p>	

### 25-2

<b>Contact Details</b>	████████████████████
<b>Organisation</b>	
<b>Comment</b>	
<p>Cricket, Rugby, Football, Athletics, Triathlon, Hockey and Swimming -all these sports and their well-run committees have contributed significantly to the vibrancy of the local community and each is supported by a platform of dedicated volunteers. At present, the rugby club is situated out at Henham and most of the clubs are reliant on out-of-hours use of spare school facilities and various playing fields that are within and around the edges of the town and its surrounding villages. Saffron Striders may be found, even on winter Tuesday nights, training on the dark urban roads and pavements of the town. In recent years there has been particularly strong growth in the junior ranks of the clubs:</p> <ul style="list-style-type: none"> <li>*Saffron Walden Community Football Club now runs 42 boys youth teams, plus soccer schools and 10 girls teams, of which only 4 can currently play at or around Catons Lane and urgently needs the promised 3G pitch at County High School</li> <li>*Every weekend, SW Rugby Club needs 14 pitches of various sizes for training age-groups from U6 to U12</li> <li>*In addition to its 4 senior teams, Saffron Walden Cricket Club currently runs a total of 15 teams for junior boys and girls, the majority of which are in its Academy framework</li> <li>*The Walden Juniors Triathlon Club has 160 active members between 7yrs and 17yrs and a waiting list of over 100. Further progress for the club has been severely impeded by the</li> </ul>	

loss of the school pool and playing fields which were regularly used for Walden JNR Tri swimming training and primary school cross-country championships.

\*SW Hockey Club, based at the Joyce Frankland Academy, Newport, fields 14 teams each Saturday and a similar number of teams across age-groups U10-U18. It currently has one 22yr old Astroturf pitch at Newport and depends on shared use of a second pitch at SW County High School.

- The District Council has been made aware on many occasions that the sports facility infrastructure in North Uttlesford is over stretched and under-funded. There is little or no spare capacity and we already have vigorous growth in our local population which will continue. There is a strong view among the major sports clubs that we are at a critical time for development of a multi-sports hub that can embrace both senior and junior sport and training whilst also creating opportunities for broader physical activity and health within the wider community. This Neighbourhood Plan provides a sound basis for influencing the third iteration of the District's Local Plan process and helping to achieve the above long-term objective.

- The District Council has been made aware on many occasions that the sports facility infrastructure in North Uttlesford is over stretched and under-funded. There is little or no spare capacity and we already have vigorous growth in our local population which will continue. There is a strong view among the major sports clubs that we are at a critical time for development of a multi-sports hub that can embrace both senior and junior sport and training whilst also creating opportunities for broader physical activity and health within the wider community. This Neighbourhood Plan provides a sound basis for influencing the third iteration of the District's Local Plan process and helping to achieve the above long-term objective.

<b>Action Proposed</b>	
Comment supportive of policy – no action proposed.	

### 25-3

<b>Contact Details</b>	████████████████████
<b>Organisation</b>	Chair – SW rugby Club
<b>Comment</b>	
There has been a huge increase in the participation of children and youths in mainstream recreational sport over the past 20 years. There has been little or no support for the respective clubs, particularly from the relevant authorities in supporting facility upgrades over this period. It is a great credit to our local clubs, and their committed volunteers that they continue to punch well above their weight competitively and offer an enjoyable experience for their many members. This policy seeks to address the very real shortfall in facilities for the children of Uttlesford and Saffron Walden in particular. The policy contains innovative and viable proposals to further sports participation in the Saffron Walden area. Given the very large number of participants of all ages and both sexes in mainstream sports, implementation of this policy should deliver a very significant and sustainable improvement in the health and wellbeing within our community	
<b>Action Proposed</b>	
Comment supportive of policy – no action proposed.	

#### 25-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	<p>I'm not from Saffron Walden but I can safely say that the development of sports facilities such as the cricket club and skate park in my village in NE Cambs has helped the young people of the area to feel more at home and accepted in an area that is predominantly focused on satisfying the needs of the older members of society. Young people in more rural communities outside of the city really struggle to participate in the community spirit when there is nothing for us there, and so putting more work into sports facilities in these areas can not only be extremely beneficial for the wellbeing of the young who spend less and less time in their local areas in favour of the cities where there is more of a community spirit that bridges generational divides, but it can also help the older generations feel more connected to the youth and get behind their passions in supporting their sporting endeavours and achievements. Development of sports facilities within a community really does tie the locals closer together in a time when it's really needed!</p>
<b>Action Proposed</b>	
Comment supportive of policy – no action proposed.	

#### 25-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	<p>I think it is integral for Saffron Walden to identify that there is a huge short fall in facilities for young people in the town. From growing up in the town and seeing youth involvement become increasingly important with mental health and social encouragement it is undeniable that some type of permanent infrastructure needs to be built in town. Personally I believe that the SW rugby club And cricket club play the largest role in sheer numbers of youth involvement in the town and it would be very encouraging to see the Rugby Club become a central, accessible point in Saffron Walden, rather than being hidden away in Henham.</p>
<b>Action Proposed</b>	
Comment supportive of policy – no action proposed.	

#### 25-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	<p>WaldenJNR is the junior section of WaldenTRI. It was formed 11 years ago and has grown to become the largest junior triathlon club in the country with in excess of 200 junior members. Up until the closure of the Friends School, the club had 3 hours of weekly access to the swimming pool, gym and playing fields.</p>

Since the closure of the Friends school, the club has been able to use Carver Barracks airfield for cycling and running but can only offer 1 hour of swim training to about 15 members at the Lord Butler pool and 2 hours of swim training in Bishops Stortford to 50 members. The later results in a one hour round trip for members and coaches. The club is unable to provide any swimming opportunity to over 130 members due to the lack of pool time. The club has no access to a gym again because of the lack of provision in the town.

The club and the community have an urgent need for better sport facilities, especially a need for a new swimming pool. A minimum 8 lane pool 25m pool. 8 lanes are so that club training session can run in parallel with public swimming, with each using 4 lanes. The current pool at 5 lane Lord Butler pool does not allow this and this has been the main stumbling block in gaining access to the pool.

<b>Action Proposed</b>	
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Comment supportive of policy – no action proposed.	
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25-7

<b>Contact Details</b>	████████████████████
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<b>Organisation</b>	
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<b>Comment</b>	
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I would like to add my support to the plan to improve sports facilities in Saffron Walden. The current situation re rugby is ridiculous and a huge disincentive for supporters And, therefore, players. Having played rugby for many years in Wales where most grounds are central to housing communities it would make a massive difference to attendance were a local site identified. In addition a location that included running/cycling/swimming facilities would be a major boost to the already popular junior and senior triathletes as well as the population in general.

With successful football and hockey teams crying out for improved training and playing venues a site incorporating all these disciplines would greatly increase involvement and performance.

<b>Action Proposed</b>	
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Comment supportive of policy – no action proposed.	
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25-8

<b>Contact Details</b>	████████████████████
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<b>Organisation</b>	
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<b>Comment</b>	
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I have lived in this wonderful town for 50 years and seen it grow in many positive ways. I remember school swimming lessons in the old pool, having to jump off the balcony into the pool for the gold standard life saving badge. Now we have a sports centre with a 25 meter length( and no balcony you have to jump from!)However we have now out grown this pool to. As a town we pride ourselves in healthy living yet sadly we have little to cater for those with disabilities, special needs or simply some were those with less confidence can enjoy the world of sport.

I have been a guide for a blind runner and I know how challenging this can be. We have an all ladies running club that brings together a wonderful group of people. Thanks to the cricket club we have an area to run we can use but again more facilities would make such a difference.

Teams are made on the games pitches, in spaces that feel safe. Mental health is so important and it has been proven time and time again how exercise can help.

What an opportunity we could have.

**Action Proposed**

Comment supportive of policy – no action proposed.

**25-9**

**Contact Details**

[REDACTED]

**Organisation**

Rugby club volunteer

**Comment**

The provision Rugby Facilities in the town would be of great benefit to a huge range of people from all walks of life. From a personal point of view my Son and Daughter both joined the Club 25 plus Years ago in the Mini Section progressing through the various age groups. My Son is still an Integral part of the Senior Playing Section. There are families from all age groups from 5 to 85 involved in the Club. It is now second and third generations that are making new friends and enjoying the community spirit a Club like ours provides.

I believe that having plans in place to bring the Club into Town will be great for the wider community providing lasting friendships whilst giving the hundreds of Children and Adults at the Club a local outlet keeping them physically fit but as importantly giving them pride in themselves and community they belong. As one of many volunteers I fully support the proposals.

**Action Proposed**

Comment supportive of policy – no action proposed.

**25-10**

**Contact Details**

[REDACTED]

**Organisation**

[REDACTED]

**Comment**

It is refreshing to see a formal plan and objectives relating to the development of young people through sport and physical activity generally. As a long standing volunteer in the world of Mini and Youth Rugby, I can attest to the principle that 'Sport is a metaphor for life'. I have been directly involved in coaching young people and now run the Mini and Youth section of Saffron Walden Rugby Football Club and I can provide first hand evidence of children and youth who, through sport, have found an immense improvement in their mental as well as physical condition . These same youngsters have, in many cases, become positive contributors to society where possibly their contributions might not have been so positive without their involvement in Sport.

**Action Proposed**

Comment supportive of policy – no action proposed.

25-11

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Chair of SW Swimming Club
<b>Comment</b>	
<p>I would like to comment with regards to sport and in particular swimming facilities.</p> <p>When a review of swimming facilities was undertaken a couple of years ago I believe it only achieved minimum requirements through the inclusion of Friends pool and maybe Felsted. These were/ are not publicly available and certainly Friends was not safe for any disability swimmers.</p> <p>The power of swimming in developing the fitness and cardio health of our youngsters is second to none, especially as they grow and develop their bones and muscles. Swimming then continues to deliver as adults providing a great family environment where all can have fun and keep healthy. Swimming is also a fabulous facility for older or less able people - helping maintain or strengthen key joints and muscles.</p> <p>I strongly believe that as the housing footprint is expanded to meet population and economic growth needs we must ensure we provide really good swimming facilities for the residents of Uttlesford and of course the Saffron Walden area.</p> <p>As such the Neighbourhood Plan really needs to be underpinned by a sports facility that will support these swimming benefits. The current facilities at Lord Butler are dated and just inadequate for the community needs.</p> <p>I am writing this email as Chair of Saffron Walden Swimming Club. Despite access to only 1 pool we produce record numbers of swimmers each year in achieving County and Regional qualifying times. We compete with clubs that almost without exception have access to at least 2 pools.</p> <p>We currently have over 125 swimmers and are coached by an ex-Olympian, David Lowe. With this foundation we have such an opportunity to provide competitive swimming to all age groups and abilities. We have a small Masters squad which includes a National level swimmer but with more pool access this could provide opportunity to many more hidden swimming talents in the area - of all ages.</p> <p>In summary, and while recognising the relative cost, there is no other sports facility that delivers all year round, for all residents - whatever age or physical disposition - as a swimming pool.</p> <p>Please ensure that this Plan adequately funds and provides space for additional swimming pool facilities in Walden and Uttlesford.</p> <p>I am happy to discuss further and to provide support where needed.</p>	

<b>Action Proposed</b>	
Comment supportive of policy – no action proposed.	

### 25-12

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>One Minet Park is a multi-generational skatepark not a children’s play area - indeed under 10 years are not allowed in the main park. Skateboarding is an Olympic sport as is BMX biking and this facility should be correctly named an outdoor wheeled sports area or skatepark. Unfortunately, the latest UDC Sports Strategy, which incorrectly puts the skatepark in the children’s play area because the UDC officer was unable to re-number the pages to put it in the right category, is now not policy in view of the Local Plan not being currently passed and the Inspector’s letter to UDC mentions extra documents (and names the Sports Strategy) as not having been consulted on in the proper manner. In addition, the UDC Sports Strategy has not been passed by UDC cabinet. Please correct your Neighbourhood Plan.</p>	
<b>Action Proposed</b>	
<p>Change appendix table to read "Skatepark" instead of "children's playground" <input checked="" type="checkbox"/></p>	

### 25-13

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>The skatepark is on a map in the appendices - it has never been called the Thaxted Rd skatepark, it is called the One Minet Skatepark, named after Andrew Minet who had started raising money to build the park and was tragically killed in a car accident. The sculpture in the park commemorates him. Calling it Thaxted Rd smacks of someone doing a desk job without proper consultation or knowledge. This is an insult to the people who raised the money and built the park in Andrew’s name.</p>	
<b>Action Proposed</b>	
<p>The map is from the UDC sports strategy - the SWNP is unable to rename the listing contained therein. However the SWNP Local Green Space listing accurately names the skatepark. No action required.</p>	

### 25-14

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Chair of Chairs – SW Sports Clubs
<b>Comment</b>	
<p>“It is encouraging to see the council’s more strategic commitment to remedy the Saffron Walden sports facilities situation, long neglected by previous authorities</p>	

For a community, which includes the surrounding villages, and has experienced years of rapid housing growth with more to come, there will continue to be immense pressure on the existing sports facilities, which it has already been noted are struggling to meet current demand

Sporting activity is vital to a vibrant community. We need an urgent solution over the short term to meet the growing demands of established clubs e.g. swimming, rugby, hockey, running, cricket, football, all of which have burgeoning junior academies and long waiting lists, plus an ability to cater for newer sports

We need modern facilities that are also flexible and offer a wide range of indoor sports, we need a properly designed central meeting point at the heart, facilities that encourage and welcome the less active and particularly those that encourage people with disabilities to train and participate

Always leaving the solution for the local grass roots sports clubs is a cheap way of kicking the can down the road, with empty promises and the consequent further delays. Given the need for healthy communities, this is no longer acceptable

The various sports clubs and organisations in the Saffron Walden area do an amazing job with their volunteers and limited finances, they deserve better support from their elected representatives

The SWNP to include a suitable local site for a multisport campus is an encouraging sign that this issue has been recognised and will be dealt with sensibly, with vision in an innovative way

We already have an outstanding national reputation for music (Saffron Hall) and cinema ( Saffron Screen) and the arts in general. All key strands for successful and thriving community life

It is long overdue that the level of our sports facilities should be on a par”

<b>Action Proposed</b>	
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Supportive of policy – no action required.
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**25-15**

<b>Contact Details</b>	████████████████████
<b>Organisation</b>	Chair of Chairs – SW Sports Clubs
<b>Comment</b>	I would prefer the opening line to para 11:3:16 to be reworded...in its current form it does leave an element of doubt and slight negativity in what is otherwise a positive and supportive section
<b>Action Proposed</b>	

Take out the first part and start the sentence with, " All development must contribute etc...."

Also insert *and* instead of *or* the improvement of existing etc



### 25-16

<b>Contact Details</b>	
<b>Organisation</b>	
<b>Comment</b>	
<p>Saffron Walden Hockey Club have 8 men's teams and 6 ladies teams. We have over 300 juniors that we accommodate, and we have waiting lists for all age groups. We have one pitch based at Joyce Frankland Academy and are in desperate need for a second pitch. Our demographic ranges from under 8's to adults in their 60's still playing. No where in the section I have read despite numerous consultations, phone calls and meetings does this document mention the need for a second pitch for Hockey. . As usual UDC have absolutely no clue, we were forced out of Walden at the same time as the Rugby Club due to the lack of foresight and planning within Uttlesford - a shambles is too polite a word.</p>	
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 25-17

<b>Contact Details</b>	
<b>Organisation</b>	
<b>Comment</b>	
<p>More multi sport facilities are required in Saffron Walden. The hugely popular triathlon and running clubs do not have any outdoor running training facilities nearby and very limited swimming pool time (1hr per week) at Lord Butler. Travelling to other facilities, the nearest which are over 30mins drive away, creates pollution and deters people from taking part in these healthy lifestyle activities. Many pavements in saffron walden are either badly lit at night or very narrow, and have parked cars on them, making them unsafe for winter night running.</p>	
<b>Action Proposed</b>	
Supportive of policy – no action required.	

### 25-18

<b>Contact Details</b>	
<b>Organisation</b>	
<b>Comment</b>	

The opening comment in this section is absolutely true...the sports facility provision in and around the Saffron Walden area has been very poor and without cohesive direction for many years. During this time the population of our villages and the town has grown substantially and existing facilities are short on capacity and suffering from prolonged wear and tear. Over decades, Saffron Walden sports clubs have punched above their weight, but this becomes more difficult as the clubs grow, they have burgeoning junior sections with long waiting lists, but are handicapped with restrictions on the capacity of available facilities. This community deserves a much better deal. A modern suite of facilities on a single site would present economies of scale and the possibility to produce a design that serves traditional, new and emerging sports activities. Importantly, it would provide a much needed centre for those involved in all types of sports and physical activity to meet and socialise. This is about visionary thinking and innovation. Subject to identifying and acquiring a suitable site, a multi sports campus, which is what other Local Authorities across the country are embracing, presents a wonderful opportunity to offer more capacity and a wider range of physical activities for the long term.

**Action Proposed**

Supportive of policy – no action required.

**25-19**

<b>Contact Details</b>	████████████████████
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<b>Organisation</b>	<b>Saffron Striders</b>
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**Comment**

Saffron Striders membership has increased rapidly over the last few years, from 113 in 2015 to 242 in 2019. This indicates that a growing number of people are taking on board the fact that sport and activity is beneficial to health; both physical and mental. However, whether the sport is more structured, requiring sports halls and playing fields, or less structured needing trails, paths and open areas, there is a quite a deficit in locally available facilities and space.

This is particularly the case in winter where short daylight hours and wet/muddy trails limit available activity space further. For example, Saffron Striders typically have 50 to 70 runners at the main weekly training session, often running as a group. This is impossible to completely accommodate on narrow pavements, many of which are blocked by parked cars.

For health, government guidance is 150 mins moderate activity (or 75 vigorous activity) a week. It would be great to have more lit, well-surfaced paths and tracks to encourage more year-round activity.

**Action Proposed**

Supportive of policy – no action required.

**25-20**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Sport England
<b>Comment</b>	
<b>Policy SW25 Playing Fields and Sports Halls</b>	
<p>The principle of progressing a new multi-sport site to address the deficiencies identified in Uttlesford District Council's playing pitch and indoor sports &amp; built facility strategies is welcomed in principle due to the scale and range of facility deficiencies that exist. If a suitable site can be identified, it is recommended that early engagement takes place with Sport England and the sports governing bodies as well as local sports clubs to discuss the scope and feasibility of the project.</p> <p>In relation to developer contributions, this aspect of the policy is welcomed but it is requested that part 2 of the policy is extended to include Sport England's Sports Facilities Calculator as well as the Playing Pitch Calculator. The Playing Pitch Calculator only covers outdoor pitch sports. The Sports Facilities Calculator was used as part of the needs assessment for the District Council's Indoor &amp; Built Sports Facilities Strategy and its use for estimating demand generate by new development for indoor facilities such as sports halls and swimming pools is advocated in the strategy (see Appendix 1).</p> <p>It is recommended that paragraph 11.3.16 of the reasoned justification to the policy is updated because since the amended CIL Regulations came into force in September 2019 the restriction on pooling developer contributions has been removed.</p>	
<b>Action Proposed</b>	
<p>1) Extend part 2 of the policy to include Sport England's Sports Facilities Calculator as well as the Playing Pitch Calculator.</p> <p>2) Amend paragraph 11.3.16 as suggest to take into account the amended CIL Regulations. <input checked="" type="checkbox"/></p>	

## 25-21

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>Objective 2 states :- Saffron Walden's residents will be able to live as healthily as possible. The population of SW, like most other areas, is aging. Sports such as rugby and football are terrific, but there are barriers for even middle-aged people, let alone oldies to take part, physical and mental.</p> <p>Activities such as jogging and running are much more accessible to all ages but are really good for maintaining health. In 2019 Saffron Striders introduced over 70 people, aged up to 68, to start running through a Beginners course, so it is clear there is a demand. That was done from a nothing 'base' which was the outside of Lord Butler. All of the</p>	

equipment used was stored at various homes. There is no facility to allow socialising (which is what newcomers to a sport often seek) such as having a coffee and cake together after a training session or run. In fact there is no facility. This is not an issue unique to running. A building that provides spaces for equipment storage, a communal area for simple food and drink after events, hot and cold water, showers and changing will be welcomed by many sports, whether or not it is associated with a team sports field. I say this as the notes provided do appear to focus on the large spaces required for rugby and football.

**Action Proposed**

The proposed multi sports site allows for running tracks and use of the facilities. No action required.

**25-22**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
SW25. Playing Fields and Sport Halls The plan does not address the acute lack of facilities for young people. Additional provision of meeting places for young people could be combined with sports facilities and youth services. Could use be made of the existing facilities on the Friends School site – still in walking distance of the town centre?	
<b>Action Proposed</b>	
Facilities for young people are supported in the Fairycroft, arts, sports, scouts hall policies. No further action required.	

**25-23**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Savills on behalf of Chase new Homes
<b>Comment</b>	
<p><b>Policy Critique</b></p> <p>5.5. The SWNP is explicitly seeking a multi-sport facility for the town. It is suggested that policy SW24 should be reworded to ensure that it is sufficiently flexible to support all developments that would bring new and improved facilities to the town. Whilst a single multi-sport site would be a major benefit to Saffron Walden, this may not be the only way to deliver recreational facilities. Therefore, a policy which proactively encourages these uses to come forward on other sites would be more likely to secure a range of provision within the town.</p>	
<b>Action Proposed</b>	
(Noting typing mistake – this is in the section on policy SW25 – not SW24 which is about allotments). This critique suggests that the SWNP should make a policy to secure sports use on other sites within the town. This is impracticable, as development sites come	

forward in small parcels, and the parcels are too small to put sports pitches on. It is hard enough to get a proper sized playground, never mind enough space for sports pitches. No action proposed as to amend the policy as suggested would dilute the chance of getting a single multi-use sports facility without correspondingly bringing a chance of getting sports facilities elsewhere.

**Comment**

- 5.1. The proposed development at The Friends School would deliver a number of the benefits identified within SW24, including the reinstatement of the swimming pool with new changing rooms, a new Artificial Grass Pitch (AGP) and associated pavilion. It is significant to note that there are no AGPs currently available across the whole district and there is a need for three of these facilities. The proposed AGP would allow use 7 days a week. The pavilion would also have meeting rooms which could facilitate the use of the forest school and be made available for local clubs and sports groups. A perimeter path could also be constructed around the site to allow for running and as a cycle route.

**Action proposed**

No action proposed Sport England is clear in that a reduction in physical space cannot be compensated for by intensification of use, and therefore the net loss of sports facilities remains unacceptable.

## SW26 Community halls and centres

### 26-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
What a shame that the opportunity for a Community Hub building next to the Leisure Centre was effectively ruled out by not being invited to any consultation by those who are determined to promote Fairycroft as the only game in town.	
<b>Action Proposed</b>	
The Town Council does not own any land adjacent to the Leisure Centre. Therefore, the TC would be unable to build a community hub there. No changes proposed.	

### 26-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
I looked for facilities planned for young people without success - they seem to have been left out.	
<b>Action Proposed</b>	
<p>This comment does not define "facilities for young people".</p> <p>The SWNP already supports:</p> <ul style="list-style-type: none"> <li>• The creation of a new community centre (which can host activities organised by youth groups);</li> <li>• A new multi-sports facility (which can allow the expansion of organised sports clubs to increase youth participation, and for example so that young people may join the running club).</li> <li>• Ongoing support to Fairycroft House which offers creative arts facilities, hosts youth mental health outreach services, and hosts a youth club.</li> <li>• A new cinema location not located in the high school (anecdotally some young people feel as though going to the cinema is like going to school and may be more likely to attend if the venue is different)</li> <li>• A new scout hall</li> </ul> <p>Any concrete suggestions for specifically defined "facilities for young people" beyond these listed here will be considered.</p>	

### 26-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	

**SW26. Community Halls and Centres**

Whilst generally supported again the plan does not directly address the acute lack of facilities for young people. For example, we believe this policy should include proposals for replacing the current scout hall. Future additional meeting places should include facilities for young people, perhaps combined with sports facilities and youth services.

**Action Proposed**

This comment does not define "facilities for young people".

The SWNP already supports:

- The creation of a new community centre (which can host activities organised by youth groups);
- A new multi-sports facility (which can allow the expansion of organised sports clubs to increase youth participation, and for example so that young people may join the running club).
- Ongoing support to Fairycroft House which offers creative arts facilities, hosts youth mental health outreach services, and hosts a youth club.
- A new cinema location not located in the high school (anecdotally some young people feel as though going to the cinema is like going to school and may be more likely to attend if the venue is different)
- A new scout hall

Any concrete suggestions for specifically defined "facilities for young people" beyond these listed here will be considered.

**26-4**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<b>Chapter 9: Infrastructure delivery (Page 72 to 75)</b> <i>Agree with content – plus: - Page 74 9.3 to 9.5 Scouting would seek to support and exploit the developer contribution scheme, Section 106 (S106) and Community Infrastructure Levy (CIL) to the benefit of the local community and Scouting. This is seen as essential in leveraging associated additional buildings for use due to the increase in demand driven by additional capacity.</i>	
<b>Action Proposed</b>	
No action required	

## SW27 Open space for informal recreation

### 27-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>I support this policy            I feel strongly that play areas should not just be designed for under 12s Could the random small grass areas left by developers be turned into 'tiny forests'? Earth watch charity has done one in Witney, Oxford</p>	
<b>Action Proposed</b>	
Supportive of policy – no action required. The LAPs at Tudor Park may be too small for forests but perhaps mini meadows? Pass idea to SWTC	

### 27-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<p><b>Policies SW24, SW27 and SW29</b>            There is not enough information in the table or otherwise to convince us that all the sites would meet the criteria set out in paragraph 100 of the NPPF.            A better approach would be to provide a detailed assessment of each site outside the plan (provide this alongside the plan) and for the plan to focus on the designation and refer back to that evidence and state that all spaces meet that criteria. Each of the sites should be assessed against the criteria.</p>	
<b>Action Proposed</b>	
This has been addressed earlier	

### 27-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Savills on behalf of Chase New Homes (owner of former Friends School site)
<b>Comment</b>	
<p><b>NPPF Criteria (para 100)</b> a) in reasonably close proximity to the community it serves;  <b>SWNP Comment</b> Yes, surrounded by houses The site is centrally located within Saffron Walden.  <b>Chase New Homes Response</b> It is within private ownership and where in the past access had been available, this was only to those people visiting the site to use the facilities on a paid for basis. The site is not in use and the facilities there are no longer open.</p>	
<b>Action Proposed</b>	

The fact that the facilities were used on a paid-for basis is irrelevant, as this is a standard business model for sporting facilities; to exclude all paid-for sporting facilities from consideration in planning matters would be to permanently exclude all sporting facilities from planning matters, which would be contrary to NPPF paragraphs 91 and 92 which explicitly require planning policies and decisions to plan positively for the creation of healthy communities and specifically reference sports facilities as a means of doing this. Sport England is clear in that facilities still count even if they are closed.  
Action – disregard this point.

#### 27-4

<b>Contact Details</b>	
<b>Organisation</b>	Savills on behalf of Chase New Homes (owner of former Friends School site)
<b>Comment</b>	
<p><b>NPPF Criteria (para 100)</b> a) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;</p> <p><b>SWNP Comment</b> Yes, was well used prior to the closure of the school.</p> <p><b>Chase New Homes Response</b></p> <p>1<sup>st</sup> para) The site did serve a recreational function for the community when it was in use as a private school, although we are advised that access was limited to sports groups, for occasional evenings and weekends.</p> <p>2<sup>nd</sup> para) Since the Walden School went into administration in 2017, the site has been closed for security reasons.</p> <p>3<sup>rd</sup> para) Therefore the site is not available to anyone at the present time.</p> <p>4<sup>th</sup> para) The site was marketed by the administrators to other educational operators but no suitable offers were forthcoming.</p> <p>5<sup>th</sup> para) The current planning application would reopen and improve the swimming pool and create additional new sports facilities including pitches and a new pavilion. Informal recreational open space is also proposed.</p> <p>6<sup>th</sup> para) Therefore, at present, the site is not able to play a role in the local community. The development on the site would facilitate the reopening and enhancement of facilities on the site to create a scheme that would benefit the whole community.</p> <p>7<sup>th</sup> para) The ongoing planning application on the site is supported by a wide range of technical reports which have considered matters such as ecology and confirmed that there are no constraints to development. In addition, the proposals would result in a range of positive environmental benefits, including new tree and hedgerow planting, large areas of open space and additional landscaping.</p> <p>8<sup>th</sup> para) The site is located within the Saffron Walden Conservation Area and the proposals aim to preserve and enhance this area. This would be achieved by retaining an area of open space in the northern part of the site and concentrating development on the southern part which is less sensitive to development.</p> <p>9<sup>th</sup> para) The scheme also has the potential to deliver ecological improvements with two large areas of open space and landscaping across the site together with a forest school in the south eastern part of the site.</p>	

10<sup>th</sup> para) Consequently there will be a net benefit in ecological terms as a result of the development.

11<sup>th</sup> para) It is therefore considered that the site has a greater potential to be special to the community in the future than at the present time, should development take place which facilitates this.

#### Action Proposed

1<sup>st</sup> para) As previously noted, Disregard this statement as misleading – sports groups had regular and frequent use of the site at evenings and weekend – not “occasional”.

2<sup>nd</sup> para) The closure of the school site is irrelevant to its status as a playing field, as noted in the Sport England response to planning application UTT/19/1744.

3<sup>rd</sup> para) As above.

4<sup>th</sup> para) This statement is disputed by other educational operators however SWNP considers it immaterial from a planning perspective. If not immaterial from a planning perspective, then details of opposing bids for the site – as material evidence to support this statement - must be brought into the public domain for fair consideration of the case.

5<sup>th</sup> para) The planning application is clear that access to the swimming pool would be almost unusable by the public given the hours and days of use proposed. The site would not create either “additional” or “new” facilities. Both the statements in para 5 should be disregarded as factually incorrect.

6<sup>th</sup> para) See above

7<sup>th</sup> para) The response from ECC Ecology to the planning application says “holding objection due to insufficient information”. Therefore, the statement in para 7 should be disregarded as factually incorrect.

8<sup>th</sup> para) The proposals have not been demonstrated to “enhance” the Conservation Area. The proposals seek to remove open green space therefore they cannot possibly be described as “preserving” the area.

9<sup>th</sup> para) See response to para 7.

10<sup>th</sup> para) See response to para 7.

11<sup>th</sup> para) For all the reasons listed above, and the objection from Sport England to the application, we do not agree with this concluding paragraph.

No further action proposed.

#### 27-5

<b>Contact Details</b>	
<b>Organisation</b>	Savills on behalf of Chase New Homes (owner of former Friends School site)
<b>Comment</b>	
<b>NPPF Criteria (para 100)</b> a) local in character and is not an extensive tract of land; <b>SWNP Comment</b> Yes, and is an appropriate size for sports. <b>Chase New Homes Response</b> The site is not considered to be local in character and does comprise an extensive tract of land. This matter is further explored below.	

- 4.7. The NPPF is explicit in stating that LGS must not relate to 'extensive tracts of land'. The PPG notes that when it comes to scale, there is "...no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed" before adding that paragraph 100 of the NPPF is clear that the Local Green Space designation should only be used where the green area concerned is *"local in character and is not an extensive tract of land"*. [Savills emphasis].
- 4.8. Of the 11 LGSs proposed by the draft SWNP, The Former Friends School, which is stated as 6.06 hectares, is the greatest in size by a considerable margin. The site clearly comprises a large tract of land. This is apparent not only by its scale but when viewed within the context of Saffron Walden as whole. More than half of the sites identified in the Neighbourhood Plan and listed on page 35 of the SWNP as LGS (6) are less than 1 hectares in size, with a further five less than 3 hectares, and one which is 3.2 hectares. Therefore, there is a considerable difference between The Former Friends School and the other sites proposed for inclusion as LGS; it is more than twice as large as the next nearest site within the list.
- 4.9. At 6.06 hectares in size, the site is plainly an extensive tract of land. This assessment is supported by examinations into Drafts of Development Plans.
- 4.10. There is no definition in planning law or guidance about what constitutes and 'extensive tract of land'. However, in recent years, Neighbourhood Plan examiners and Local Plan Inspectors have considered sites much smaller than 6 hectares to meet the definition.
- 4.11. Having regard to the above, and its scale in relation to Saffron Walden, it is considered that The Former Friends School comprises an extensive tract of land, and its designation is not therefore permissible within the context of national planning policy.
- 4.12. Through SW27 and its designation of LGS on this large area of land, the draft NP is seeking to apply a similar level of protection as would be afforded to Green Belt. This approach is not appropriate in relation to development within a sustainable central location and the scale of protection should be commensurate to the degree of importance. The blanket designation of the whole of the former Friends School playing fields site is significantly in conflict with national planning policy and has the potential to undermine and restrict the delivery of sustainable development, which is at the heart of the NPPF. This site is in a sustainable location and given the immediate need for sites should be looked at for development ahead of greenfield countryside locations. At the heart of the NPPF are the principles of sustainable development, which include the importance of making effective use of land. The designation of the site in its entirety as LGS misses the real opportunity that would arise from supporting housing on part of the site as a means of facilitating the enhancement of recreational facilities in this location. It would also provide a significant level of affordable housing within Saffron Walden.
- 4.13. In addition, this point would directly contradict the 'basic conditions' that NPs must adhere to in order to be found sound, including (d) which states *"the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development"*.

### Action Proposed

As noted by the respondent, there are no hard and fast rules about what constitutes an "extensive tract of land" although PPG guidance is as follows:

*"How big can a Local Green Space be?"*

*There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land.*

*Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name." Paragraph: 015 Reference ID: 37-015-20140306*

PPG is clearly demonstrating that an “extensive tract of land” would be something akin to a green belt in size and purpose.

How big are green belts? The latest statistics available are online here:

<https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2018-to-2019> and they list the 15 Green Belts in England, which vary in size between 730ha and 512,400ha. The average size of a green belt is a little over 108,112ha . In this context, it is clear that the site in question, at 6.06 ha, nowhere near the scale of a Green Belt and therefore should not be excluded from listing as a LGS as though it were.

Neither is it akin to a Green Belt in terms of purpose, which according to the weblink above:

*“Green Belt serves five purposes: ● to check the unrestricted sprawl of large built-up areas; ● to prevent neighbouring towns merging into one another; ● to assist in safeguarding the countryside from encroachment; ● to preserve the setting and special character of historic towns; and ● to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”* To list the site as a Local Green Space is not the same as seeking to achieve all of the objectives above, and therefore is not seeking to define it as a *“new area of Green Belt by any other name”*. The listing is simply designed to protect existing playing fields and a valuable green lung in the centre of a town which is expanding at the edges because it does not have a Green Belt.

For all of these reasons, the objection to listing of the site as Local Green Space on grounds that it is too large does not stand up. No further action proposed.

## 27-6

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Savills on behalf of Chase New Homes (owner of former Friends School site)
<b>Comment</b>	
<p><b>Notification of land owners</b></p> <p>4.14. The PPG states that, in respect of LGSs, the qualifying body, i.e. those responsible for the preparation of the Neighbourhood Plan, which in this instance is the Town Council, <i>“...should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan”</i>.</p> <p>4.15. Savills has been advised that Chase New Homes has not been notified, at any stage of the draft NP's preparation, of the proposed LGSs affecting land within their control. As a result, this is the first opportunity which Chase New Homes has been afforded to make representations to the proposed LGS. The Town Council have therefore failed to follow PPG advice and so the application of Policy SWNP27 of the draft NP further fails to meet 'basic condition (a)' for this reason. Prior to the submission of their planning application Chase New Homes presented their scheme to the Town Council and the issue of Local Green Space and the Neighbourhood Plan was not raised.</p>	
<b>Action Proposed</b>	

SWTC has made its position regarding the CNH site crystal clear and on public record on many occasions, not least when CNH attended the TC meeting and in the TC's response to the planning application, not to mention whenever asked about it in the press. It is disingenuous of CNH to suggest that it was not aware that Saffron Walden is seeking to protect these playing fields and essential green space for future generations. No action proposed

27-7

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p><b>Policy 28</b>  I fully support this policy.  As a matter of interest, when I first came to the town, Audley End Park (The section off Abbey Lane, owned by Audley End Estates and not English Heritage) was not farmed and so the whole area could be used to walk over so that people were not confined to the footpaths. This was wonderful for families to enjoy and for dog walkers who could exercise their dogs safely away from roads. It would be wonderful if Audley End Estates could be encouraged/incentivised to do this again for the benefit of the town and also the environment.</p>	
<b>Action Proposed</b>	
None required	

27-8

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>I moved onto the 'infamous' Tudor Park estate around 5 months ago. I worked in Saffron Walden some 20 years ago, moved away and have now returned. I am a single lady of 72 and have a lovely Labrador called Bonnie, who needs walking every day. I do not have a car. As I am epileptic I am not allowed to drive and use a mobility scooter for serious shopping.</p> <p>I live at 6 Howland Place. My side windows overlook the Ashdon Road. Houses facing the Ashdon Road own the land right down to the pavement. These are numbers 10,11,12, 13, 7 and 8. The strip of land between numbers 13 and 7 leading down to the road appears to be no mans land and was an overgrown eyesore when I moved in. I have had it trimmed, but to whom does it belong?</p> <p>Lots of people in the Close cut across this piece of land to go into town down the muddy bank. It would be great if steps could be made, to make the descent safer. The alternative</p>	

route is to go up the road to the flats, turn left along the path to the road and then back on one's tracks down the road.

Alternatively I have to turn right out of my house. Turn right along Gabriel Street and then up Clutton road - another detour.

I understand that finally the roads on the estate have been adopted. But what about the communal green spaces. The developer has a management committee, but due to an error only half the residents pay the management fee. Lucky me - I don't have to pay it! However I think the situation is very unfair and feel the the Council should adopt all the communal spaces on these new developments as is, I believe government policy. Residents on these estates contribute greatly to the revenues of local councils and to prosperity of the town.

The Clifton Road roundabout is a disaster.

The white line around the outer circle is worn and faded. Since the 30mph sign at the top of the hill is faded and close to illegible, vehicles race up and down the hill and so fail to slow at the roundabout. I would say the 90% clip the outer circle and in some cases ignore it totally. The outer circle needs building up.

Just after the roundabout, the pavement on the left into Walden runs out. I am told the developers sold the land to the purchasers of the houses. What was planning thinking! There needs to be pavement there. All the pedestrian residents of the estate have to cross the road, walk down and then cross again to the bus stop opposite Homebase. A dangerous manoeuvre as on their right is a blind corner.

The pavement along the Ashdon Road is a disgrace. Arriving at the Common having travelled on a mobility scooter, I feel like a scrambled egg.

I accept that more houses need to be provided around the town, but please ensure that adequate open spaces are provided including provision for older young people . The leisure centre and skate park are nearly 2 miles from the extreme east of the town. There is no pedestrian access to open countryside in my area, apart from a very muddy track at the end of Whitecroft Road. I am told that in the past the Council provided material to mitigate the mud. Perhaps it could be done again.

The road to Ashdon narrows at the site of the old railway bridge, making it too dangerous for pedestrians, but I see the route of the disused railway line as it runs past Ridgeons. Is there any possibility that the old railway line could be made into a green lane to allow access to the open country side on a firm surface that would allow all members of the community, pedestrians, cyclists, parents with pushchairs and the disabled to enjoy more than the sterile man made environments of the new estates in the area? Perhaps Ridgeons, having benefited greatly financially from the sale of land could be persuaded to help practically and financially in such a worthwhile project.

Playing areas for older young people do not exist here. Opposite me on the Mortimer Gate estate is a very sloping area shown on the plans from Bloor as a football pitch. What

a joke and what slip up by Planning! There is another area further along that is unfenced and again sloping making it unsuitable for ball games.

There is a field between the Manor Park estate and the fuel facility that would make a great football pitch, skateboard park and perhaps tennis/ basket ball area as well as a place for dog walking. How about it?

I think it is very important that additional facilities are provided in the new estates. There is a great need for a convenience store to the north east of the town. I hope I am right in thinking that the new planned estate by Ridgeons will have one.

We need more trees to encourage bird life. In 5 months, despite putting bird feeders all round my house I had one visit from a blackbird, one from a magpie and one from a wagtail. One day I was host the 5 pigeons- big excitement. As I have previously mention, these estates are a sterile environment and should be planted with many more trees.

I see that there is a requirement for new estates to provide 5% housing for the elderly. This provision should have a large landscaped area with seating for the elderly, with open access to all and perhaps a playground to help integrate young people and the elderly. Also ample parking.

Judging by the huge numbers of babies and toddlers around me I predict an urgent need for the provision of nursery, infant, junior and senior places. Has anyone done a survey of the numbers of young children on the estates?

Please for give my ramblings. Saffron Walden is a lovely rural town and a great place to live, but I hope that some of my suggestions are taken on board.

<b>Action Proposed</b>	
No action required for SWNP, suggestions to be passed to SWTC.	

27-9

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	<p><b>Representation 8 – Policy SW27 – Objection</b></p> <p>The requirement to deliver 7.61ha of informal open space per 1000 people is not justified or supported by sufficient and proportionate evidence. Fields in Trust recommend that 2.4ha of accessible green space be provided per 1000 people. While the comments provided with the SWNP regarding the under provision of open space on some recent</p>

developments is noted, the policy requirement to deliver 76m<sup>2</sup> of open space for every new resident is not justified or deliverable.

Such an approach would again not be consistent with other policies contained with the plan, namely Policy SW6 that requires efficient use of land to be made.

The requirement for every residential development to deliver a new play area is also not justified and it has not been explained how such an approach would contribute to the delivery of sustainable forms of development. There needs to be a trigger which requires infrastructure such as play areas to be provided only in relation to developments of a certain size (possible trigger of 50 dwellings) and where there is a clear deficit in the immediate local area.

While the aspirations of the policy are noted, it has to be realistic, justified and deliverable. As drafted, it is not. It is suggested that the amount of open space required to be delivered by new development be reduced. A requirement more in keeping with the Fields in Trust standard is regarded as being more appropriate and more likely to contribute towards the delivery of sustainable development. Triggers also need to be provided so that the need to deliver open space relates to a scale of the development that can deliver such infrastructure.

**Action Proposed**

Reword the policy to clarify on play areas, but do not dilute the delivery of adequate green space.

**27-10**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	<p><b>Chapter 11: Open space, sports and recreation (Page 91 to 109)</b></p> <p><i>Agree with content – plus: -</i></p> <p><i>Page 91</i></p> <p><i>11.1.3 Scouting is largely an outdoor pursuit, although it is not actually a “sport”, many of the activities undertaken are sport based or as equally as energetic as any sport requiring cost effective open space (including woodland) and / or recreational facilities. Scouting agrees with NPPF Para 100.</i></p> <p><i>We also note the comment in 11.1.8 which is very limited and should be expanded to include a wide range of other outdoor pursuits undertaken by “young people”.</i></p> <p><i>Page 96</i></p> <p><i>11.3.6 Please add to list of “shortfalls” = A shortfall of open space for the purpose of Scouting activities such as camping / backwoods cooking / pioneering etc.</i></p> <p><i>All these items need to be cost effective so that the organisation can afford to use them if there was to be any fee imposed.</i></p> <p><i>Page 98</i></p> <p><i>11.3.15 – 11.3.17 As part of any sport development Scouting would request the consideration of the construction of a climbing wall.</i></p>

*Scouting support Policy SW 25*

*Page 100*

*11.4 Community halls and centres. Scouting supports the comments "...they all operate over capacity" and that at current levels, Scouting carries a significant waiting list of eligible young people currently missing out on this essential "life skills" opportunity.*

*Scouting supports Policy SW 26*

*11.5.14 – 15 Scouting support the creation of properly "useful" spaces, not miscellaneous small parcels of land.*

*Scouting supports Policy SW 27*

**Action Proposed**

Add to list of shortfalls



## SW28 Public rights of way

### 28-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p><b>Policy 28</b> It is worth noting that the footpath which runs adjacent to Aldi leading from Tiptofts Lane and which will be adjoining the area earmarked for development has already been spoilt by litter from the commercial development. This is not only an eyesore and also harmful to wildlife and the environment.</p>	
<b>Action Proposed</b>	
None proposed	

### 28-2

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p><u>Policy SW28 – Public Rights of Way</u> – ECC recommends that further review and consideration regarding the precise wording and implications of the policy be undertaken. The policy states “<i>development proposals that would obstruct or would result in a detrimental impact upon the enjoyment of a public right of way will not normally be allowed</i>” (policy SW28, Page 108, Bullet 1). SWTC should note that the legislation (Town and Country Planning Act) allows for the stopping up or diversion of PROW to enable development. The test that is usually applied is to determine the value of the path against the benefit of the development. ECC considers that the current wording within the policy which would not allow any alterations to the PROW is against national policy and therefore unrealistic.</p> <p>ECC recommends that consideration be given to the impact of development on matters in relation to ‘noise’, ‘pollution’ and the impact on tranquillity, views and clean air. Development will inherently bring changes to a local area; it is for policy to be utilised to determine what type of change is material and warrants refusal. It is recommended that that further consideration is given to this policy, and it may be more effective that the policy includes reference to mitigation measures to limit the impact of development on PROW, or highlights what would be expected if changes to the PROW are permitted. ECC welcome further discussions on this matter.</p> <p>ECC notes that the policy seeks to advocate the incorporation of green landscaping to reduce visual impacts visible from the PROW. ECC recommends that in designing landscaping consideration is given to maintenance.</p>	

Appendix 3 – Transport Wish List – ECC notes that there are 14 walking schemes and 17 cycle schemes identified in appendix 3. Where appropriate PROW formal numbers should be provided on the table for clarity.

ECC supports sustainable transport within the town and has produced the [Uttlesford Cycling Action Plan](#), however it is important to understand the desirability, feasibility, deliverability, impact and costs of these proposals in order to be able to prioritise the schemes. Local consultation on the schemes would also be helpful in order to determine whether there is any conflict between users.

ECC notes that the SWTC are seeking changes and alterations to existing walking and cycling routes. A PROW cannot be changed to a cycling and walking track without conversion to a cycle track and any change to a PROW will have to go out to consultation. The proposals may include current PROW and given the works being suggested may impact the maintenance of the PROW and the ongoing management must be agreed.

ECC recommends discussion with our Essex Highways and PROW team to ensure that walking and cycling infrastructure improvements proposed within the Plan are realistic and deliverable.

Action Proposed	
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1) The “not normally be allowed” phrase in the policy conforms with national legislation, i.e allows for the interests of development to override the interests of the footpath users.	
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2) Nonetheless, this raises a question about the how much landscaping is required, and it is suggested add the following bold type text to the point 2: “and incorporate <b>substantial green landscaping</b> ”.	
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**What is substantial?**

The pleasantness of an off-road footpath is that the user can hear the birds and enjoy a tranquil rural setting, and in this particular region, wide and sweeping views and a sense of open space. Development adjacent to a footpath would remove the views and the sense of open space, therefore it is essential that the adjacent landscaping is sufficient to provide *at least* the same tranquillity. (“at least” because this would only slightly mitigate and not compensate for the loss of open space). It is suggested therefore that “substantial” is a wide avenue for walking, cycling, horseriding, sufficient for many simultaneous users, bordered on either side by wide swathes of natural planting, such as might be suggested by Essex Wildlife Trust, in order to screen off the development and provide the user with a sense that they are still in the natural countryside.

## SW29 Land of value to the natural environment

### 29-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Uttlesford District Council
<b>Comment</b>	
<b>Policies SW24, SW27 and SW29</b>	
<p>There is not enough information in the table or otherwise to convince us that all the sites would meet the criteria set out in paragraph 100 of the NPPF.</p> <p>A better approach would be to provide a detailed assessment of each site outside the plan (provide this alongside the plan) and for the plan to focus on the designation and refer back to that evidence and state that all spaces meet that criteria. Each of the sites should be assessed against the criteria.</p>	
<b>Action Proposed</b>	
See earlier response	

### 29-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Gladman
<b>Comment</b>	
<p>As submitted, this policy is more restrictive than national policy and guidance regarding biodiversity, as it does not allow for mitigation or compensatory measures to counteract impacts on the natural environment. Gladman suggest amendments are made to the wording of the policy to accord with Paragraph 175 of the Framework which seeks for impacts on biodiversity to be minimised.</p>	
<b>Action Proposed</b>	
This policy describes sites which are designated as Local Green Space, and is in accordance with Paragraphs 99-101 of the Framework. No action required	

### 29-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Carter Jonas
<b>Comment</b>	
<b>Representation 9 - Policy SW29 – Objection</b>	
<p>The policy states that sites that are of value to the natural environment, which are close to the town of Saffron Walden and which are of benefit to the community are listed in Appendix 8 and are designated as Local Green Space.</p>	

There is no list provided within Appendix 8. Appendix 8 does however include a map which identifies areas of open space. Land north of De Vigier Avenue, Saffron Walden, also known as site SAF5 in the EULP is identified on the plan.

Turnstone St Neots Limited objects to the identification of site SAF5 as a site of value to the natural environment which is also of benefit to the community. The land in question has been the subject of extensive ecological surveys. A Summary Ecology note has been prepared and submitted in support the current appeal that is being considered on the land. A copy of that summary is attached (**Attachment 1**). This summary concludes that the majority of the habitats which exist on the site are of little or local ecological value only. The one exception is an area of calcareous grassland which covers only a small part of the site. As explained with the attached note, that grassland is to be translocated to provide an enhanced area of grassland on the adjacent site. The land is not the subject of any other ecological designations.

The site is also a land locked parcel of land. It is not accessible and does not provide useable open space. This is confirmed in Appendix 5 of the SWNP. The land is therefore of very limited ecological value and is not accessible to the local community.

Paragraph 100 of the NPPF states that the Local Green Space designation should only be used where the green space is:

1. In reasonably close proximity to the community it serves;
2. Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
3. Local in character and is not an extensive tract of land.

While site SAF5 is local in character and close to the nearby community, the land does not serve that community. It is inaccessible. The site also does not pass the test of being special because it is not of particular local significance having regard to the criteria set out above. The identification of the land as designated Local Green Space is therefore not consistent with national policy and is not justified.

Site SAF5 is also identified as a draft allocation for housing in the EULP. While the status of the EULP is now unclear, the Council has not yet confirmed if it does intend to withdraw the plan. The Local Plan inspectors have raised no objection to draft allocation SAF5 within their January 2020 letter. The SWNP's intention to allocate this land as Local Green Space is in conflict with the draft allocation contained within the EULP. The land should not therefore be identified as Local Green Space and the SWNP should instead confirm the site as an allocation for housing in order to ensure it is consistent with the EULP.

Even if the EULP is ultimately withdrawn, it is clear from the Inspectors letter of January 2020 that additional sites will need to be identified in and around Saffron Walden. Both the EULP and SWNP therefore needs to be allocating more sites for housing rather than seeking to remove allocations that have been carefully tested within the Sustainability Appraisal.

In this regard I attach an extract from the Sustainability Appraisal December 2018 which supported the EULP. The table provided within the attached extract (**Attachment 2**) provides the assessment for site SAF5 (referred to in the table as site O3SAF15). As will be noted, site O3Saf15 is tested against 30 separate criteria. Only one negative "red" score is given which relates to the agricultural land classification of the site (which is irrelevant as

the site is not agricultural land and could not be farmed given its size, shape, form and topography).

The table considers the proposal against several ecological matters but confirms that the site has a positive “green” impact against all assessed criteria. It is also confirmed that the site is not protected open space.

The identification of the land as Local Green Space is therefore not justified, is inconsistent with the strategic policies of the EULP and is in conflict with the NPPF. Policy SW29 and Appendix 5 and 8 should therefore be updated accordingly.

<b>Action Proposed</b>	
No change proposed	

## SW30 Arts and cultural facilities

### 30-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Theatres Trust
<b>Comment</b>	
<p>The Trust is supportive of the plan's approach to improving and developing cultural provision in Saffron Walden. We also welcome part 2 of the policy which would support a community cinema and/or an arts centre. We would advocate an arts centre as a first priority as this would afford greater flexibility and versatility in terms of programming and broaden the range of arts immediately accessible to local people and groups. Should a proposal for such a facility come forward we would encourage engagement with the Trust from an early stage.</p> <p>The plan might consider bringing forward an additional policy which supports change of use within the town centre for cultural use and supports the temporary use of vacant units. There are now a number of examples across the UK where theatres and cinemas have been set up within small shop units.</p>	
<b>Action Proposed</b>	
<p>Add an additional policy as proposed. While Policy SW11 Town centre uses would support the change of use from a vacant shop to an arts centre, there is no harm in adding an additional policy for certainty. The supporting text is supportive of any measures which serve to increase the interest of the town centre, and an arts centre would do this. <input checked="" type="checkbox"/></p>	

### 30-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Screen
<b>Comment</b>	
<p>With regards to section 12.11 due to an update to current thinking on the space required and the number of screens, I would prefer the following text:</p> <p>Saffron Screen is a 200-seat single screen community cinema based at County High School. The service it provides is constrained by the fact that it shares a hall with the High School; for example, it cannot get new films because they must be shown for 7 consecutive days and the hall does not have the bookings capacity to offer this. Ideally, in order to achieve economies of scale for management, and provide the fullest programme, it seeks a site whereby it can have 3 screens of approximately 160, 120 and 80 seats. A further flexible area could be used for other events such as exhibitions, courses, and meetings. A café/bar area would be essential for revenue and to enhance the visitor experience. The current location at the High School is on the edge of the town, so visitors</p>	

tend to drive to it and then return straight home after the screening. A new site within the town would encourage people to walk or use the town centre public car parks and this would boost the evening economy in the town centre.

**Action Proposed**

Adopt the change as requested.

### 30-3

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	<b>Chapter 12: Arts and cultural facilities (Page 110 to 112)</b> <i>Agree with content - no additional comment.</i>
<b>Action Proposed</b>	
None required	

## SW31 Education

### 31-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
<p>School transport NEEDS to be looked at very carefully. In the days when children went to their catchment schools, transport was provided by ECC up to the end of Primary School. Now children are expected to go to their nearest school, and the allocation of school transport has dropped to those under 8yrs old , there are several problems for families in villages outside Saffron Walden, older siblings do not get free transport, so parents need to take them in by car. None of the 'nearest schools to our village – Wendens Ambo are safe to walk to or from. The bus from Audley End station to SWCHS costs parents £10.00 a day! It is cheaper to travel around Cambridge for a day for that! I really feel that Uttlesford need to help parents in villages to provide help with getting their children to school. Rail companies offer half price tickets up to the age of 16, then 16-24 passes that allow cheaper tickets, why not the buses?</p>	
<b>Action Proposed</b>	
<p>Pass comment to ECC public transport department and County Councillor <input checked="" type="checkbox"/></p>	

### 31-2

<b>Contact Details</b>	[REDACTED] Principal Planning Officer (Spatial Planning) [REDACTED]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>The Plan states “the town has not had the proportionate addition of essential infrastructure such as schools” (Paragraph 2.13, page 7). ECC wishes to provide clarification on this statement as it is important to note that sufficient school places have been provided for each age cohort. In recent years, lower demand from existing population has balanced the demand generated from new homes. Regarding primary provision, the current Reception cohort is 173 pupils (October census) against a capacity (published admissions number) of 210 places. Saffron Walden County High attracts pupils from other areas and has sufficient capacity to meet local demand.</p>	
<b>Action Proposed</b>	
<p>Change para 13.1 to say “ECC has responsibility for assessing the need for new school places and for commissioning the necessary capacity, and has responsibility for setting the developer contribution rates for education provision.”. Note ECC include SWCHS and Newport together, so SWCHS may not have capacity; add in an additional sentence in 13.6 to say that “The Essex County Council Ten Year Plan groups Saffron Walden County High School and Joyce Frankland Academy in Newport together for the purpose of forecasting</p>	

the local need for secondary school places. The Town Council is opposed to this classification as it makes it impossible to understand the capacity requirements of each school separately, and it is unsustainable for children resident in Saffron Walden to be reliant on secondary school provision in Newport.”

Change the first sentence to read “Essex County Council guidelines require secondary schools to accommodate a minimum of 600 pupils (equivalent to the estimated need from 3,000 new or existing homes), and in practice will look to establish a new secondary school only with a minimum capacity of 6 forms of entry (or 900 pupils in total, equivalent to the need of 4,500 existing or new homes) An additional secondary school is unlikely therefore to be forthcoming given the level of development required.”



31-3

<b>Contact Details</b>	[Redacted] Principal Planning Officer (Spatial Planning) [Redacted]
<b>Organisation</b>	Essex County Council
<b>Comment</b>	
<p>Education Roles and Responsibilities – It is recommended that SWTC reviews the ECC <a href="#">Local and Neighbourhood Planners’ Guide to School Organisation</a> as this sets out the responsibilities that ECC has as Education Authority. ECC considers the statement in the Plan “ECC has full responsibility for the provision of education” (paragraph 13.1, page 113) is over simplified. This text should be amended to read as follows:</p> <p><i>“Under section 14 of the 1996 Education Act, local authorities must secure sufficient school places to serve their area. The available schools must be sufficient in number, character and equipment to provide all pupils with the opportunity of an appropriate education. Section 2 of the 2006 Education and Inspections Act further places Essex County Council, as the appropriate local authority, under a duty to secure diversity in the provision of schools and increase opportunities for parental choice. Subsequent legislation has also encouraged the development of a more diverse range of education providers, in particular Academy Trusts and Free Schools. To meet these duties, Essex County Council acts as a commissioner rather than a provider of new schools and, in order that potential providers may express their interest in running a</i></p>	

*school, will set out the requirements for the provision needed to serve a new community.*

*Regardless of whether local schools have Academy status, are Free Schools, or are Maintained Schools, Essex County Council is the appropriate authority to assess the requirement for additional school places to serve any new housing developments proposed by a Local Plan or supported by a Neighbourhood Plan. Where a Section 106 agreement (developer contribution) delivers the land and funding for a new school, Essex County Council will usually procure the buildings and then transfer it to the successful school provider”.*

It is noted that the Plan refers to the report Commissioning School Places in Essex 2016 – 2021. It is important to note that this is no longer the up to date document that sets out forecasts. This should instead be taken from the [Essex School Organisation Services’ Ten Year Plan](#).

ECC notes that the Plan highlights concerns regarding the increasing birth-rate and the delivery of new homes within Saffron Walden. ECC wishes to highlight that the 10 Year Plan reflects the fall in birth-rate and the level of housing set out within the UDC Local Plan (Regulation 19) and this Plan.

ECC notes paragraph 13.5 refers to the provision of a 2-form entry primary school. It is also important to note that this is also supported by the advice set out in the ECC Local and Neighbourhood Planners’ Guide to School Organisation (weblink provided above). This guide states “It should be noted that the Education and Skills Funding Agency currently looks to establish two form entry primary schools (420 places), to ensure financial viability. Essex County Council supports this approach and, thereby, when considering new primary school sites an area of 2.1 hectares will usually be sought as a minimum. This is in line with Department for Education guidance set out in Building Bulletin 103 and also provides space for commensurate Early Years and Childcare provision” (Section 2.2, page 4).

ECC notes that Plan sets out the requirements for providing a new Secondary School. It is recommended that the provisions set out in the emerging Plan reflect those of the Education Authority. These are clearly articulated within the Local and ECC Neighbourhood Planners’ Guide to School Organisation, which states:

*“Generally, secondary schools accommodate at least 600 pupils or four forms of entry (one form of entry = five age groups x thirty per class). However, larger schools are:*

- able to offer a wider curriculum to their community;*
- cheaper to build on a per place basis;*
- more resilient to fluctuations in demand that could challenge financial viability.*

*For these reasons Essex County Council will look to establish a new school only where demand for six forms of entry has been established (from approximately 4,500 new or existing houses)”.*

<b>Action Proposed</b>	
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1) To include the full text suggested would over-complicate the section on Education – the purpose of this phrase was simply to make it clear to resident readers that it is beyond the remit of a neighbourhood plan to forecast future requirements or provide education. No action.	
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2) Update the supporting text to include reference to the ten-year plan.

31-4

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<p><b>Chapter 13: Education (Page 113 to 114)</b>  <i>Agree with content – plus: -</i>  <i>Page 113</i>  <i>13.1 Additional schools / building if made cost effective to hire would be useful to Scouting providing access and security is ensured.</i></p>	
<b>Action Proposed</b>	
None required	

31-5

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Iceni Projects on behalf of Dianthus Land Ltd.
<b>Comment</b>	
<p>Policy SW31 Education          Planning for education to align with new housing development is supported. Policy SW31 Education states:  <i>“The land allocated in planning applications UTT/13/3467/OP and UTT/17/2832/OP for a primary school must be reserved for educational use, or for community use unless or until required for educational use.”</i></p> <p>The draft Section 106 Agreement relating to UTT/17/2832/OP which is currently being finalised, includes provision for the land to be reserved for educational use for a fixed period of time. In the event the land is not required by Essex County Council for educational purposes, the land will be offered to Saffron Walden Town Council for community use or open space. If this offer is not accepted, a management company will be set up to maintain the land. Therefore, whilst it is envisaged the land will be retained in educational or community use in perpetuity, there could be a scenario where it is used as open space.</p>	

It is requested that the policy wording is updated to reflect the Section 106 Agreement to add reference to open space as an alternative use, so that it can be considered to be deliverable.

<b>Action Proposed</b>	
Amend as suggested.	

## SW32 Healthcare

### 32-1

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	NHS
<b>Comment</b>	
<p>In principle NHSPS, who will henceforth be referred to as 'we' within this response, support the document put forward by Saffron Waldon Neighbourhood Town council in the 'Saffron Waldon Neighbourhood Plan', however suggest the following amendment (as set out below).</p> <p><b>Health Facilities</b></p> <p>We acknowledge the comments put forward in supporting paragraph 14.1 of the document which states:</p> <p><i>'Alongside the medical practices, the NHS has responsibility for provision of healthcare and sets the rates that developers pay to mitigate additional demand created by development.'</i></p> <p>We believe that it would be beneficial to include the following comments to supporting paragraph 14.1 to make the statement more robust.</p> <p><i>'We will work with the clinical commissioning group and NHS bodies to understand the relationship growth has with their services and what this means for preparing a development strategy.'</i></p>	
<b>Action Proposed</b>	
Add this in to the supporting paragraph.	<input checked="" type="checkbox"/>

### 32-2

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	NHS
<b>Comment</b>	
<p>14.2. The community hospital only has one geriatric ward called Avocet. The other unit is Kingfisher which is non-inpatient – but for rehabilitation sessions. Maternity services are also provided at the hospital by Princess Alexandra Hospital midwives at outpatient clinics.</p> <p>14.3 Both GP practices are split between the sites in Saffron Walden and Great Chesterford.</p> <p>14.5</p>	

West Essex Clinical Commissioning Group is pursuing the use of the under-utilised community hospital for delivery of general medical services via a GP practice.

**Action Proposed**

Amend paragraphs in supporting text as per suggestions

**32-3**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
At what point in the plan would Uttlesford qualify for a Minor Injuries Unit? This would take pressure off A&E services and reduce travel to Cambridge/Harlow.	
<b>Action Proposed</b>	
This is within the remit of the NHS but is supported by the SWNP. No action required.	

**32-4**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	
<b>Comment</b>	
SW32. Healthcare Supported in principle. However we do not believe the development of a community health centre on the Radwinter Rd site would meet stated criteria for access on foot, cycle or public transport. Additional requirements for access to a future health centre should include: Obviously safe walking and cycling access, and via routes with good air quality. In addition, parking on the site is inadequate. A walk in clinic and minor injuries unit should be provided as travel to Cambridge and Bishop's Stortford is limited and time consuming without a car.	
<b>Action Proposed</b>	
No change possible. ECC considers Radwinter Road to offer safe walking and cycling access.	

**32-5**

<b>Contact Details</b>	[REDACTED]
<b>Organisation</b>	Saffron Walden Scout District
<b>Comment</b>	
<b>Chapter 14: Health care (Page 115 to end)</b> <i>Agree with content - no additional comment.</i>	

<b>Action Proposed</b>	
None required	